

**INITIAL STUDY AND
MITIGATED NEGATIVE DECLARATION**

**WOODSPRING SUITES PROJECT
NEC OF COTTONWOOD AVE. & PAHUTE AVE.
APN 3093-141-05
VICTORVILLE, CALIFORNIA**



LEAD AGENCY:

**CITY OF VICTORVILLE
DEVELOPMENT DEPARTMENT, PLANNING DIVISION
14343 CIVIC DRIVE
VICTORVILLE, CALIFORNIA 92393**

REPORT PREPARED BY:

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FEBRUARY 7 2024

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MITIGATED NEGATIVE DECLARATION

PROJECT NAME: WoodSpring Suites Project

PROJECT APPLICANT: The Applicant for the proposed project is the TGC Group, 322 S. Mosely Street, Wichita, Kansas, 67202.

PROJECT LOCATION: The 3.18-acre project site is located in the south-eastern portion of the City of Victorville. Victorville is located in the southwestern portion of San Bernardino County in the southwestern Mojave Desert physiographic subregion. Regional access to the City of Victorville is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation through the center of the City; U.S. Highway 395, traversing the western portion of the City in a northwest to southeast orientation; and Palmdale Road (SR-18) (State Route 18), which traverses the southern portion of the City in an east to west orientation. The proposed project site is located to the west of the Mojave Freeway (I-15) on the northeast corner of Cottonwood Avenue and Pahute Avenue. The site is bounded by Cottonwood Avenue on the west and Pahute Avenue on the south side. Access to the I-15 Freeway is provided by Cottonwood Avenue. The Freeway is located approximately 200 feet north of the site's northwest corner. The project site's legal address is 14952 Pahute Avenue. The corresponding Assessor Parcel Number (APN) is 3093-141-05. The project site's latitude and longitude is 34°28'41.88" N; -117°20'15.0" W.

CITY AND COUNTY: City of Victorville, San Bernardino County.

PROJECT: The City of Victorville is reviewing an application to construct and operate a new 4 story extended stay hotel. The 4-story, wood framed building would consist of 113 guestrooms. The total floor area of the proposed new hotel would be 46,406 square feet. The proposed hotel would be an "extended stay" hotel. An extended stay hotel offers long term accommodations for guests. With amenities such as self-serve laundry and in-suite kitchens, the extended stay hotels are a cost-effective and convenient alternative to renting a traditional apartment. The proposed project would not include any restaurant facilities, meeting rooms, or other ancillary uses other than those uses related to the hotel's daily operation. The total number of proposed parking spaces would be 118 parking spaces including 113 standard parking spaces and 5 ADA compliant parking spaces. A total of 24 parking spaces would be EV capable, 2 spaces would be EV accessible, and a total of 6 charging stations would be provided. The parking areas would be located around the proposed hotel building and along the north, south, and west sides. Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue. Landscaping would total 63,099 square feet and would be provided around the site's perimeter, along the site frontages, and around the hotel building.

EVALUATION FORMAT: The attached initial study is prepared in accordance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of the attached Initial Study was guided by Section 15063 of the State CEQA Guidelines. The project was evaluated based on its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist includes a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact
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Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

No Impact: No impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact: No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less than Significant Impact with Mitigation: Possible significant adverse impacts have been identified or anticipated and mitigation measures are required as a condition of the project's approval to reduce these impacts to a level below significance.

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WOODSPRING SUITES PROJECT • APN 3093-141-05 • NEC OF COTTONWOOD AVE. & PAHUTE AVE.**

Potentially Significant Impact: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in the attached Initial Study.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology & Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation & Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities & Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation, the following finding is made:

<input type="checkbox"/>	The proposed project <i>COULD NOT</i> have a significant effect on the environment, and a <i>NEGATIVE DECLARATION</i> shall be prepared.
<input checked="" type="checkbox"/>	Although the proposed project could have a significant effect on the environment, there shall 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 <i>MITIGATED NEGATIVE DECLARATION</i> shall be prepared.
<input type="checkbox"/>	The proposed project <i>MAY</i> have a significant effect on the environment, and an <i>ENVIRONMENTAL IMPACT REPORT</i> is required.
<input type="checkbox"/>	The proposed project <i>MAY</i> 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 <i>ENVIRONMENTAL IMPACT REPORT</i> is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an <i>earlier EIR or NEGATIVE DECLARATION</i> pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that <i>earlier EIR or NEGATIVE DECLARATION</i> , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____

Date _____



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APPENDICES (UNDER A SEPARATE COVER)

APPENDIX A – AIR QUALITY REPORT

APPENDIX B – BIOLOGICAL REPORTS

APPENDIX C – CULTURAL REPORT & AB-52 INFORMATION

APPENDIX D – PRELIMINARY WQMP

SECTION 1. INTRODUCTION

1.1 OVERVIEW OF THE PROPOSED PROJECT

The City of Victorville is reviewing an application to construct and operate a new 4 story extended stay hotel within a 3.18-acre site. The 4-story wood framed building would consist of 113 guestrooms. The proposed hotel would be an “extended stay” hotel.¹ The total floor area of the proposed new hotel would be 46,406 square feet. The proposed project would not include any restaurant facilities, meeting rooms, or other ancillary uses other than those uses that would be directly related to the hotel’s operation. The total number of proposed parking spaces would be 118 parking spaces including 113 standard parking spaces and 5 ADA compliant parking spaces. A total of 24 parking spaces would be EV capable, 2 spaces would be EV accessible, and a total of 6 charging stations would be provided. The parking areas would be located around the proposed hotel building and along the north, south, and west sides. Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue. Landscaping would total 63,099 square feet and would be provided around the site’s perimeter, along the site frontages, and around the hotel building.²

1.2 PURPOSE OF THIS INITIAL STUDY

The City of Victorville is the designated *Lead Agency*, and as such, the City will be responsible for the project’s environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.³ As part of the proposed project’s environmental review, the City of Victorville has authorized the preparation of this Initial Study.⁴ The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project would have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Victorville with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project’s environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated with the proposed project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Victorville in its capacity as the Lead Agency. The City determined, as part of this Initial Study’s preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project’s CEQA review. Certain projects

¹ An extended stay hotel offers long term accommodation for guests. With amenities such as self-serve laundry and in-suite kitchens, the extended stay hotels are a cost-effective and convenient alternative to renting a traditional apartment.

² BRR Architects. *Design Presentation Package. WoodSpring Suites Development Package*. November 16, 2023.

³ California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions*. as Amended 2001. §21067.

⁴ Ibid. (CEQA Guidelines) §15050.

or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.⁵ This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.⁶ Questions and/or comments should be submitted to the following contact person:

City of Victorville Development Department, Planning Division
14343 Civic Drive
Victorville, California 92323

1.3 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.



⁵ California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067, and Section 21069.* 2000.

⁶ California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b).* 2000.

SECTION 2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed project site is located in the south-eastern portion of the City of Victorville. The City of Victorville is located in the southwestern portion of San Bernardino County in the southwestern Mojave Desert physiographic subregion. This physiographic subregion is more commonly referred to as either the "Victor Valley" or the "High Desert" due to its approximate elevation of 2,900 feet above sea level. The Victor Valley is separated from the more populated areas of coastal Southern California by the San Bernardino and San Gabriel mountains. The City of Victorville is bounded on the north by unincorporated San Bernardino County (Oro Grande); on the east by Apple Valley and unincorporated San Bernardino County (Bell Mountain); on the south by the City of Hesperia and unincorporated San Bernardino County (Oak Hills); and on the west by the City of Adelanto and unincorporated San Bernardino County (Baldy Mesa).⁷ Regional access to the City of Victorville is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation through the center of the City; U.S. Highway 395, traversing the western portion of the City in a northwest to southeast orientation; and Palmdale Road (SR-18) (State Route 18), which traverses the southern portion of the City in an east to west orientation.⁸ The location of Victorville, in a regional context, is shown in Exhibit 1. A citywide map is provided in Exhibit 2.

The proposed project site is located to the west of the Mojave Freeway (I-15) on the northeast corner of Cottonwood Avenue and Pahute Avenue. The site is bounded by Cottonwood Avenue on the west and Pahute Avenue on the south side. Access to the I-15 Freeway is provided by Cottonwood Avenue. The Freeway is located approximately 200 feet north of the site's northwest corner. The project site's legal address is 14952 Pahute Avenue. The corresponding Assessor Parcel Number (APN) is 3093-141-05. The project site's latitude and longitude is 34°28'41.88" N; -117°20'15.0" W. A local vicinity map is provided in Exhibit 3. An aerial photograph of the site and the surrounding area is provided in Exhibit 4.

2.2 ENVIRONMENTAL SETTING

The site is currently vacant and undeveloped. An aerial photograph of the site and the surrounding area is provided in Exhibit 3. The vegetation community present on site supports a moderately disturbed Mojave Desert Scrub habitat encompassing mainly native plants, including Joshua trees, and some non-native grasses. The project site's General Plan designation is *Commercial* and it is zoned as *General Commercial (C-2)*. Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* An existing Hilton Garden Inn and the High Desert Wellness: Integrative Psychotherapy and Holistic Health facility are located to the north of the project side. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.⁹

⁷ Blodgett Baylosis Environmental Planning. 2024.

⁸ Google Earth and City of Victorville Zoning Map. <https://www.arcgis.com/apps/>. Website accessed February 1, 2024.

⁹ Ibid.

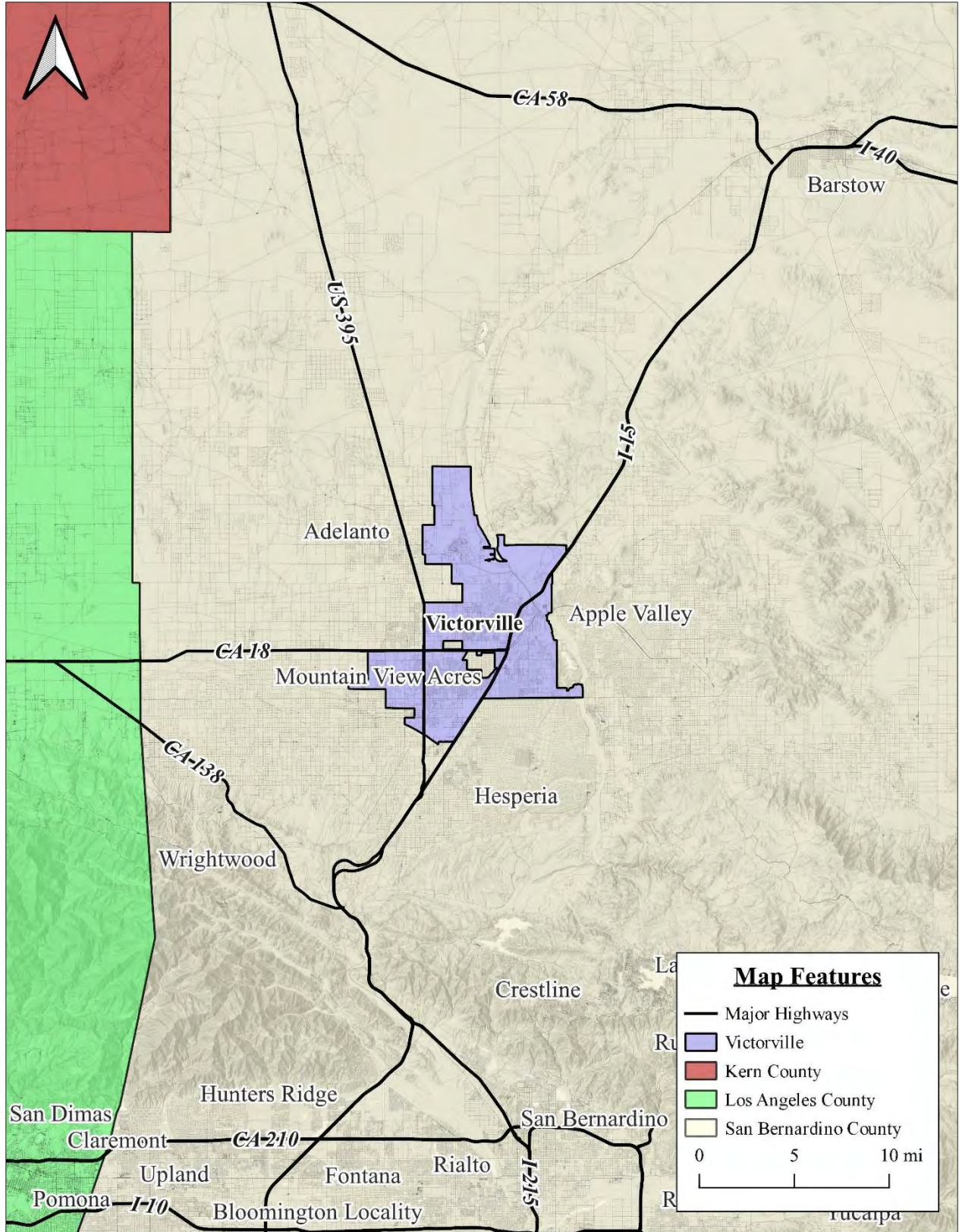


EXHIBIT 1 REGIONAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

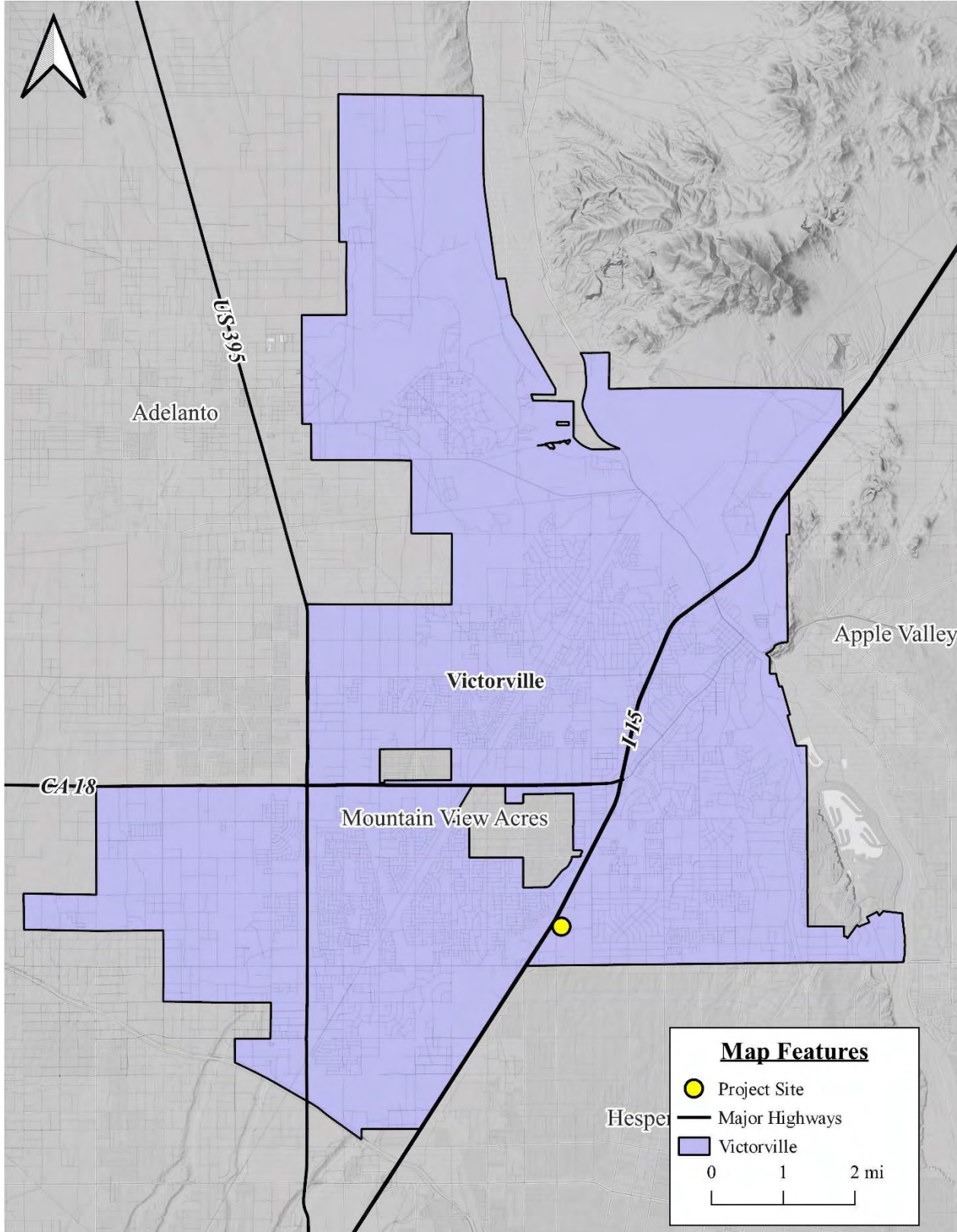


EXHIBIT 2 CITYWIDE MAP
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

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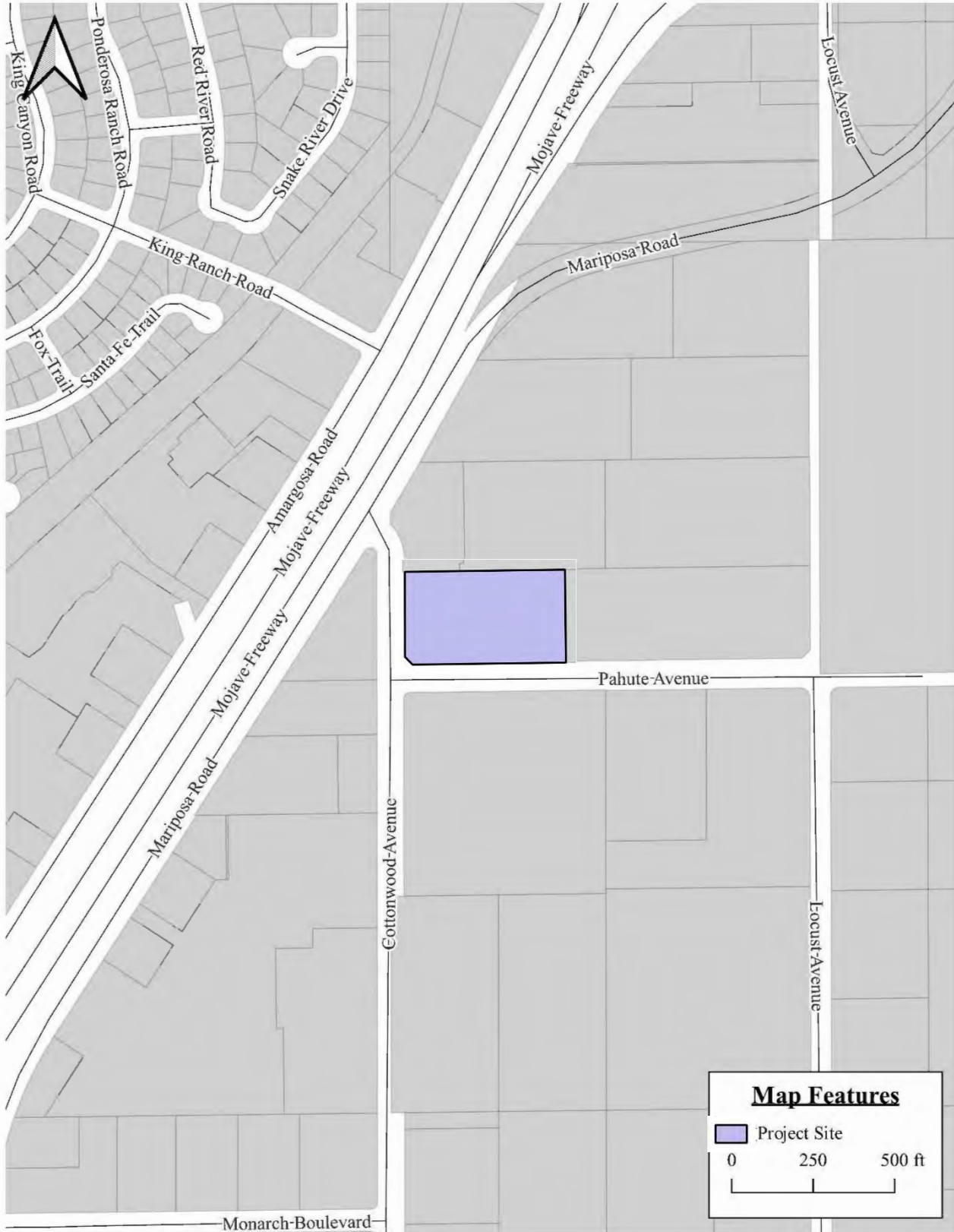


EXHIBIT 3 LOCAL MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING



EXHIBIT 4 AERIAL IMAGE OF PROJECT SITE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

- *South of the project site:* Pahute Avenue extends along the project site’s south side. A vacant lot and the Azusa Pacific High Desert campus is located to the south of the project site, south of Pahute Avenue. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.¹⁰
- *West of the project site:* Cottonwood Avenue extends along the project site’s west side. Various commercial businesses are located to the west of the project site, on the west side of Cottonwood Avenue. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.¹¹

The land uses for the site and the surrounding area are summarized in Table 1.

Table 1 Existing Land Use and Land Use Zoning Districts

Location	Existing Land Use	General Plan	Zoning
Project Site	Vacant land	Commercial	General Commercial (C-2)
North	Hotel	Commercial	General Commercial (C-2)
South	Pahute Ave. & Commercial	Commercial	General Commercial (C-2)
East	Vacant land	Commercial	General Commercial (C-2)
West	Cottonwood Ave. & Commercial	Commercial	General Commercial (C-2)

2.3 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project would consist of the following elements:

- *Site Plan.* The project would involve the construction and operation of a new 4-story hotel that would consist of 113 guest rooms within the 3.18-acre site. The new building would be centrally located within the project site and would be surrounded by parking areas and landscaping. The floor area ratio (FAR) for the proposed hotel development would be 0.34 and would have a corresponding lot coverage of 11,818 square feet (8%). The site would be fully improved following development with hardscape surfaces consisting of 75,226 square feet (46%) and landscaping totaling 63,099 square feet (46%).¹²
- *New Hotel Building.* The new hotel building would consist of four floors and would contain 113 guest rooms. The maximum height of the proposed 4-story hotel building would be 45-feet. The total floor area of the proposed new hotel would be 46,406 square feet. The main public entrance to the new hotel would be on the ground floor on the south-facing elevation. The construction type of the new hotel building would be Type V-A (Protected Wood-frame). The entire building would be fully sprinkled. Amenities would include an outdoor pool and lounge area located near the east side of the hotel’s ground level.¹³
- *First Floor.* This floor would have a total floor area of 11,818 square feet and would contain 23 guest rooms. This floor would also include the registration area, a lobby, an employee training area, a pool equipment storage area, a fitness room, and elevators and stairways.

¹⁰ Google Earth and City of Victorville Zoning Map. <https://www.arcgis.com/apps/>. Website accessed February 1, 2024.

¹¹ Ibid.

¹² BRR Architects. *Design Presentation Package. WoodSpring Suites Development Package.* November 16, 2023.

¹³ Ibid.

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- *Second Floor.* This floor would have a total floor area of 11,526 square feet and would contain 30 guest rooms. This floor would also include a utility room and elevator/stairwells.
- *Third Floor.* This floor would have a total floor area of 11,526 square feet and would contain 30 guest rooms. This floor would also include a utility room and elevator/stairwells.
- *Fourth Floor.* This floor would have a total floor area of 11,526 square feet and would contain 30 guest rooms. This floor would also include a utility room and elevator/stairwells.
- *Access.* Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue.¹⁴
- *Parking.* The total number of proposed parking spaces would be 118 parking spaces including 113 standard parking spaces and 5 ADA compliant parking spaces. A total of 24 parking spaces would be EV capable, 2 spaces would be EV accessible, and a total of 6 charging stations would be provided. The parking areas would be located around the proposed hotel building and along the north, south, and west sides of the project site.¹⁵
- *Landscaping, Signage, and Fencing.* Landscaping would total 63,099 square feet and would be provided around the site's perimeter, along the site frontages, and around the hotel building. All of the landscape materials would consist of drought tolerant species and drip-irrigation would be used where required. Company logo signage would be installed on the building elevations. Additional monument signage would be provided along the Cottonwood Avenue frontage. An ornamental fence would surround the outdoor lounge and pool area.¹⁶
- *Retention Basins.* The easternmost portion of the project site would include four stormwater retention basins (referred to as Basin A1 through A4. Basin A1 would have a retention volume of 3,115 cubic feet, Basin A2 would have a retention volume of 564 cubic feet, Basin A3 would have a retention volume of 1,536 cubic feet, and Basin A4 would have a retention volume of 2,510 cubic feet. The site would be designed so that stormwater runoff would be retained onsite.¹⁷
- *Lighting.* Exterior lighting would consist of decorative wall packs located on the building elevations and exterior LED lighting in the parking areas and along the walkways. The parking area lighting would include 10 light poles with an approximately height of 25-feet.
- *Utilities.* The proposed hotel development would connect to an existing 12-inch sanitary sewer line in Pahute Avenue and Cottonwood Avenue. The project would connect to an existing 12-inch water line in Cottonwood Avenue.¹⁸

The proposed project's site plan is illustrated in Exhibit 5. Building elevations are shown in Exhibit 6. The proposed project is summarized in Table 2.

¹⁴ BRR Architects. *Design Presentation Package. WoodSpring Suites Development Package.* November 16, 2023.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

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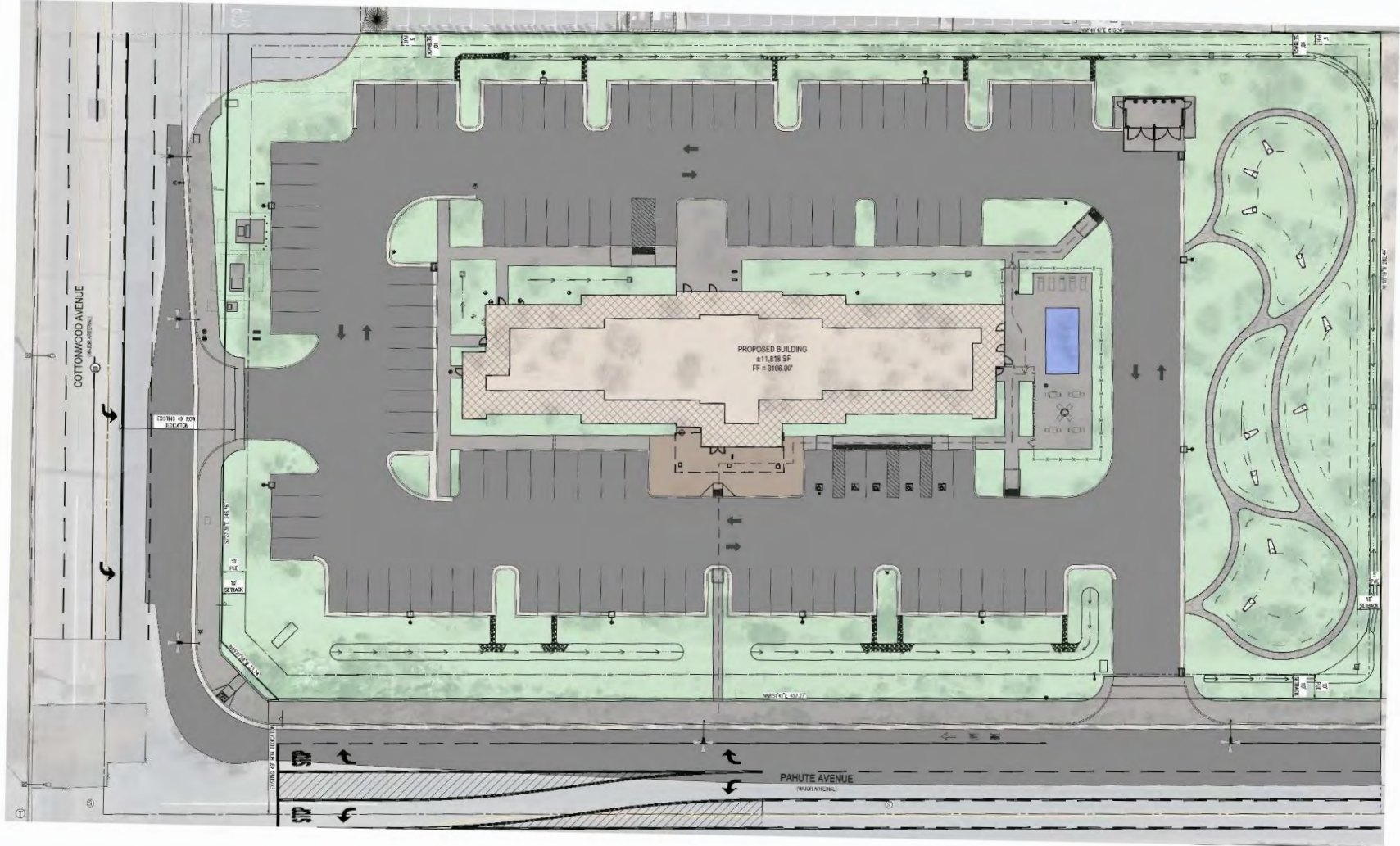


EXHIBIT 5 SITE PLAN
SOURCE: BRR ARCHITECTS

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2 REAR ELEVATION RENDERED
1/4" = 1'-0"



1 FRONT ELEVATION RENDERED
1/4" = 1'-0"

EXHIBIT 6 BUILDING ELEVATIONS

SOURCE: BRR ARCHITECTS

Table 2 Project Summary

Project Element	Description
Total Site Area	3.18-acres (138,325 sq. ft.)
4 story hotel	47,274 sq. ft. (113 guest rooms)
First Floor	11,818 sq. ft. (23 guest rooms)
Second Floor	11,526 sq. ft. (30 guest rooms)
Third Floor	11,526 sq. ft. (30 guest rooms)
Fourth Floor	11,526 sq. ft. (30 guest rooms)
Parking	118 parking stalls (113 standard & 5 ADA)
Landscaping	63,099 sq. ft

Source: BRR Architects. *Design Presentation Package. WoodSpring Suites Development Package.* November 16, 2023.

2.4 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed hotel’s anticipated hours of operation would be seven days a week, 24 hours a day. The proposed WoodSpring Suites hotel would be an “extended stay” hotel. The proposed project would not include any restaurant facilities, meeting rooms, or other ancillary uses other than those uses related to the hotel’s operation. For purposes of analysis, we are assuming that approximately 3 to 5 persons would be employed at the hotel for each shift.

2.5 CONSTRUCTION CHARACTERISTICS

The construction for the current proposed project is assumed to commence in January 2025 and would take approximately twelve months to complete. The key construction phases are outlined in the paragraphs that follow.

- *Grading and Site Preparation Phases.* The project site would be graded and ready for construction. During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. These phases would require one month to complete.
- *Building Phase.* The new hotel building would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This phase will take approximately ten months to complete.
- *Paving, Landscaping, and Finishing Phases.* The typical heavy equipment used during these phases would include trucks, backhoes, rollers, pavers, and trenching equipment. The site will be paved, landscaped, and undergo finishing during this phase. This phase will take approximately one month to complete.

2.6 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Victorville) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- Site Plan review;
- The approval of a Conditional Use Permit (CUP); and,
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).



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SECTION 3. ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);
Agricultural & Forestry Resources (Section 3.2);
Air Quality (Section 3.3);
Biological Resources (Section 3.4);
Cultural Resources (Section 3.5);
Energy (Section 3.6);
Geology & Soils (Section 3.7);
Greenhouse Gas Emissions; (Section 3.8);
Hazards & Hazardous Materials (Section 3.9);
Hydrology & Water Quality (Section 2.39);
Land Use & Planning (Section 3.11);

Mineral Resources (Section 3.12);
Noise (Section 3.13);
Population & Housing (Section 3.14).
Public Services (Section 3.15);
Recreation (Section 3.16);
Transportation (Section 3.17);
Tribal Cultural Resources (Section 3.18);
Utilities (Section 3.19);
Wildfire (Section 3.20); and,
Mandatory Findings of Significance (Section 3.21).

3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect on a scenic vista?			✘	
B. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.				✘
C. Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✘
D. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		✘		

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- California Department of Transportation. *Official Designated Scenic Highways*. www.dot.ca.gov
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on aesthetics if it results in any of the following:

- The proposed project would have an adverse effect on a scenic vista, except as provided in PRC Sec. 21099.
- The proposed project would have an adverse effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- The proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality. or,
- The proposed project would, except as provided in Public Resources Code Section 21099, create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The evaluation of aesthetics and aesthetic impacts is generally subjective, and it typically requires the identification of key visual features in the area and their importance. The characterization of aesthetic

impacts involves establishing the existing visual characteristics including visual resources and scenic vistas that are unique to the area. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), and existing light and glare characteristics (e.g., nighttime illumination).

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect on a scenic vista? • Less than Significant Impact.*

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south, southwest, and southeast of the site. In addition, local views are already dominated by commercial development located along the I-15 corridor. Views from the mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. *As a result, the impacts would be less than significant.*

B. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway • No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site. There are no officially designated highways located near the City. The nearest highways that are eligible for designation as a scenic highways include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The viewsheds pertaining to Victorville are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains. The site would not qualify as undeveloped desert land since the site is surrounded by development and it is currently zoned as General Commercial (C-2). The site is also located adjacent to developed properties. The proposed site does not contain any sensitive habitats or rock outcroppings. Lastly, the project site does not contain any buildings listed in the State or National Register. *As a result, no impacts would occur.*

C. *Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact*

There are no protected views in the vicinity of the project site. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other than the development standards to which the new hotel development would be required to conform with. *As a result, no impacts would occur.*

D. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • Less than Significant Impact with Mitigation*

The proposed project would not expose any light sensitive receptors to any light and glare impacts. The nearest receptors are residential uses located approximately 1,800 feet to the east (east of Balsom Road). Project-related sources of nighttime light would include parking area lighting, building area exterior lights,

signage, security lighting, and vehicular headlights. The City of Victorville Municipal Code contains design guidelines that indirectly regulate the aesthetic quality of new development with respect to structures, signs, walls, landscaping, street widths, and street lighting. The project must be in conformance with the City of Victorville’s Municipal Code Section 16-3.11.060. Nevertheless, the following mitigation measure would be required to address potential light and glare impacts.

- All light fixtures (including portable fixtures) shall be oriented downward and away from adjacent properties in conformance with municipal code Section 16-3.11.060. Lighting shall consist of the minimal wattage necessary to provide safety at the construction site. A construction lighting plan shall be submitted to the City of Victorville Development Department for review concurrent with Grading Permit application.

As a result, the impact would be less than significant with mitigation.

MITIGATION MEASURES

Nevertheless, the following mitigation measure would be required to address potential light and glare impacts:

AES MITIGATION 1. All light fixtures (including portable fixtures) shall be oriented downward and away from adjacent properties in conformance with municipal code Section 16-3.11.060. Lighting shall consist of the minimal wattage necessary to provide safety at the construction site. A construction lighting plan shall be submitted to the City of Victorville Development Department for review concurrent with Grading Permit application.

3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✘
B. Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✘
C. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✘
D. Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✘
E. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*.
- California Department of Conservation. *State of California Williamson Act Contract Land*. ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on agriculture and forestry resources if it results in any of the following:

- The proposed project would 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.
- The proposed project would conflict with existing zoning for agricultural use, or a Williamson Act contract.
- The proposed project would 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)).
- The proposed project would result in the loss of forest land or conversion of forest land to non-forest use.
- The proposed project would 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.

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of Important Farmland. It divides the state's land into eight categories of land use designation based on soil quality and existing agriculture uses to produce maps and statistical data. These maps and data are used to help preserve productive farmland and to analyze impacts on farmland. Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance are all Important Farmland and are collectively referred to as Important Farmland in this analysis. The highest rated Important Farmland is Prime Farmland. The California Land Conservation Act of 1965, or the Williamson Act, allows a city or county government to preserve agricultural land or open space through contracts with landowners. The County has areas that are currently agriculture preserves under contract with San Bernardino County through the Williamson Act of 1965. Contracts last 10 years and are automatically renewed unless a notice of nonrenewal is issued.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? • No Impact.*

According to the California Department of Conservation, the project site does not contain any areas of Farmland of Statewide Importance, and no agricultural uses are located onsite or adjacent to the property. The implementation of the proposed project would not involve the conversion of any prime farmland, unique farmland, or farmland of statewide importance to urban uses. *As a result, no impacts would occur.*

B. *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? • No Impact.*

The property is currently vacant though it has been disturbed. There are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract. *As a result, no impacts would occur.*

C. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? • No Impact.*

As previously mentioned, the existing project site is vacant. There are no forest lands or timberlands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timberland uses. *As a result, no impacts would occur.*

D. *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? • No Impact.*

No forest lands are located within the project site. No loss or conversion of forest lands to urban uses would result from the proposed project's implementation. *As a result, no impacts would occur.*

E. *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? • No Impact.*

The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use. No farmland conversion impacts would occur with the implementation of the proposed project. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✘
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?		✘		
C. Would the project expose sensitive receptors to substantial pollutant concentrations?			✘	
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✘	

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.
- Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast*. April 2016.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on air quality if it results in any of the following:

- The proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- The proposed project would 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.
- The proposed project would expose sensitive receptors to substantial pollutant concentrations.
- The proposed project would result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-

related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone (O₃)* is a nearly colorless gas that irritates the lungs, and damages materials and vegetation. Ozone is formed by a photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide (CO)* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide (CO).
- *Nitrogen Oxide (NO_x)* is a yellowish-brown gas, which at high levels can cause breathing difficulties. NO_x is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide (NO_x).
- *Sulfur Dioxide (SO₂)* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides (SO_x).
- *PM₁₀ and PM_{2.5}* refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of PM₁₀ and 65 pounds per day of PM_{2.5}.
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project conflict with or obstruct implementation of the applicable air quality plan? • No Impact.*

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City of Victorville is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2045 RTP/SCS, the City of Victorville employment will increase from 41,200 in 2016 to 61,200 in 2045, an increase of 20,000 new employees through the year 2045. The proposed project’s employment will be significantly less than this figure. The proposed hotel is anticipated to employ approximately 3 to 5 persons. Therefore, the proposed project is not in conflict with the growth

projections established for the City by SCAG. The project’s construction emissions would be below the thresholds of significance established by the MDAQMD (the project’s daily construction emissions are summarized in Table 1). In addition, the proposed project’s long- term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 4). *As a result, no impacts would occur.*

B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? • Less than Significant Impact with Mitigation.

According to the MDAQMD, any project is significant if it triggers or exceeds the daily emissions threshold identified previously (and noted at the bottom of Tables 3 and 4). In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the MDAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3 and 4);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City’s Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The proposed project’s construction and operation will not lead to a violation of the above-mentioned criteria. As shown in Table 1, daily construction emissions will not exceed the MDAQMD significance thresholds.

Table 3 Estimated Daily Construction Emissions

Construction Phase	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	43.2	31.7	31.2	0.05	9.26	5.25
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod V.2022.1.1.21

Long-term emissions refer to those air quality impacts that would occur once the proposed project has been constructed and is operational. These impacts would continue over the operational life of the project. The two main sources of operational emissions include mobile emissions and area emissions related to off-site electrical generation. The analysis of long-term operational impacts summarized in Table 4 also used the CalEEMod V.2022.1.1.21 computer model. The analysis summarized in Table 4 indicates that the operational (long-term) emissions will be below the MDAQMD daily emissions thresholds.

Table 4 Estimated Operational Emissions in lbs./day

Emission Source	ROG	NOx	CO	SO2	PM10	PM2.5
Total (lbs./day)	9.29	4.63	35.9	0.07	5.12	1.41
Daily Thresholds	137	137	548	137	82	65
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod V.2022.1.1.21

The analysis presented in Tables 3 and 4 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3 and 4, the impacts are considered to be less than significant. The MDAQMD has developed standard mitigation measures that must be applied to all construction projects as a means to control fugitive dust and diesel emissions. As a result, the following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

- The Applicant shall prepare and submit to the MDAQMD, prior to commencing earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the project;
- The Applicant shall ensure that signage, compliant with Rule 403 Attachment, is erected at each project site entrance not later than the commencement of construction.
- The Applicant shall ensure the use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.
- All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown dropout. This wind fencing requirement may be superseded by local ordinance, rule or project-specific biological mitigation prohibiting wind fencing.
- All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related track out onto paved surfaces and clean any project-related track out within 24 hours.

The aforementioned mitigation measures would reduce the potential air quality impacts to levels that are less than significant.

C. Would the project expose sensitive receptors to substantial pollutant concentrations? • Less than Significant Impact.

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major

transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. Due to the nature of the proposed use and its proximity to the nearest sensitive receptor (residential housing), approximately 1,800 feet to the east (east of Balsam Road). The proposed hotel would not result in any operational emissions that would exceed thresholds (refer to Table 4). *As a result, the impacts would be less than significant.*

D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? • Less than Significant Impact.

The MDAQMD has also adopted and is implementing *Rule 402, Nuisance*. This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. The future uses within the proposed project site would be required to adhere to the rules governing nuisance odors. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The following mitigation measures have been incorporated herein to further reduce the potential air quality impacts to levels that are less than significant.

AIR MITIGATION 1. The Applicant shall prepare and submit to the MDAQMD, prior to commencing earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the project;

AIR MITIGATION 2. The Applicant shall ensure that signage, compliant with Rule 403 Attachment, is erected at each project site entrance not later than the commencement of construction.

AIR MITIGATION 3. The Applicant shall ensure the use of a water truck to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions. For projects with exposed sand or fines deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.

AIR MITIGATION 4. All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown dropout. This wind fencing requirement may be superseded by local ordinance, rule or project-specific biological mitigation prohibiting wind fencing.

AIR MITIGATION 5. All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Take actions to prevent project-related track out onto paved surfaces and clean any project-related track out within 24 hours.

3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✘		
B. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			✘	
C. Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			✘	
D. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✘
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✘		
F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- RCA Associates, Inc. *General Biological Resources Assessments Victorville San Bernardino County. APN 3093-141-02.* Report dated December 20, 2021. The biological resources study is included in Appendix B.
- RCA Associates, Inc. *Western Joshua Tree Census Victorville San Bernardino County. APN 3093-141-05.* Report dated January 20, 2025. The biological resources study is included in Appendix B.
- Victorville, City of. *General Plan Update.* <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on biological resources if it results in any of the following:

- The proposed project would 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.

- The proposed project would 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 US Fish and Wildlife Service.
- The proposed project would 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.
- The proposed project would 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.
- The proposed project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Sensitive biological resources include a variety of plant and animal species that are specialized and endemic to a particular habitat type. Due to loss of habitat, some of these species have been designated by either, or both, the federal and state government resource agencies as threatened or endangered. Species listed as threatened include those whose numbers have dropped to such low levels and/or whose populations are so isolated that the continuation of the species could be jeopardized. Endangered species are those with such limited numbers or subject to such extreme circumstances that they are considered in imminent danger of extinction. Other government agencies and resource organizations also identify sensitive species, those that are naturally rare and that have been locally depleted and put at risk by human activities. While not in imminent danger of jeopardy or extinction, sensitive species are considered vulnerable and can become candidates for future listing as threatened or endangered.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • Less than Significant Impact with Mitigation.*

The relatively flat site is approximately 925 meters above sea level and contains no slope. The property consists of Bryman Loamy fine sand which has a 2 to 5 percent slope and Cajon Sand with a 0 to 2 percent slope. There is no frequency of flooding, excessively well-draining, and has a high available water capacity. The vegetation community present on site supports a moderately disturbed desert scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), rubber rabbitbrush (*Ericameria nauseosa*), Joshua trees (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), Asian mustard (*Brassica tournefortii*), and cheatgrass (*Bromus tectorum*). The site supports a variety of wildlife, with many of them being birds. Two mammals were observed on site, black-tailed jackrabbit (*Lepus californicus*) and desert cottontail (*Sylvilagus audubonii*). Although not seen, coyote signs were also observed on site including canid digs and scat throughout the property. Species

that were not observed but are expected to occur on site given their abundance in the surrounding areas include California ground squirrel (*Otospermophilus beecheyi*) and antelope ground squirrel (*Ammospermophilus leucurus*).

Birds observed included common ravens (*Corvus corax*), house finch (*Carpodacus mexicanus*), Verdin (*Auriparus flaviceps*), Anna's hummingbird (*Calypte anna*), and rock pigeon (*Columba livia*). No reptiles were observed during the field investigation due to the temperature and time of year. Species that are expected to occur on site include the common side-blotched lizard (*Uta stansburiana*) and western whiptail lizard (*Cnemidophorus tigris*). During the field surveys one drainage channel was observed along the southern boundary of the site that runs west to east before it dead ends into Balsam Road. It is the opinion of RCA Associates, Inc. that no additional surveys will be necessary given the lack of a nexus to a more significant body of water up or downstream. In addition, no sensitive habitats (e.g., sensitive species, critical habitats, etc.) have been documented in the immediate area according to the CNDDDB (2021) and none were observed during the field investigations. The following are the listed and special status species that have the ability to occur on the project site.

- *Mohave Tui Chub*: The Mohave Tui Chub is a federally and state endangered species that is fully protected. The site is located within the documented Hesperia quad habitat according to CNDDDB (2021). There are only three populations of Mohave tui chub, with a fourth population having been recently introduced to the Mojave river. The site, however, does not contain or is connected to the Mojave River, and no Mohave tui chub will occur on site.
- *Mohave Ground Squirrel*: The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. Occupiable burrows were found on the site, but no Mohave ground squirrels were detected. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following criteria, that there have been two recent sightings, within 20 years, of the species in the Hesperia quadrangle.
- *Booth's Evening-Primrose*: The Booth's evening primrose is a California threatened annual plant species that thrives in arid areas, and has hairy reddish-green stems, mottled foliage, with smaller flowers which have either white, red, or yellowish petals. The flower's optimal preferred habitat includes Joshua tree and pinyon/juniper woodland that have sandy flats and steep loose slopes. Although the site contains California juniper, Joshua trees, and little areas of sandy areas, it is the opinion of RCA Associates, Inc. that the habitat is no prime habitat for the Booth's evening primrose given the lack of recent sightings, and the little sandy areas occurring on the site.
- *Western Joshua Tree*: The Western Joshua Tree (*Yucca brevifolia*) occurs throughout the Mojave Desert in Southern California and are typically found at an elevation of 400 to 1,800 meters (–1,200 to –5,400 feet). Joshua trees within the western portion of the Mojave Desert typically receive more annual precipitation during "normal" years; consequently, cloning occurs more often, resulting in numerous trunks sprouting from the same root system (Rowland, 1978). Joshua tree habitats provide habitat for a variety of wildlife species including desert woodrats (*Neotoma* sp.) and night lizards (*Xantusia* sp.) both of which utilize the base of the trees. A variety of birds also utilize Joshua trees for nesting such as hawks, common ravens, and cactus wrens. CDFW considers Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act,

Food and Agricultural Code (80001 — 80006).

- *Sensitive Plants:* There are two plant species that have been documented in the Hesperia quad, the short-joint beavertail cactus and white-pygmy-poppy. In recent years, only the short-joint beavertail has been seen within 20 years in the Hesperia quad, while the white pygmy-poppy has not been observed for over 20 years. The site currently does not support suitable habitat for the two species and none were observed on site during the December 16, 2021 field investigations. These species are not expected to occur on the site in the foreseeable future based on the length of time they have been observed in the area and lack of suitable habitat, and therefore the project is not expected to impact any sensitive species
- *Sensitive Wildlife:* Within the Hesperia Quad, seven species are listed as Species of Special Concern. These are the yellow warbler, burrowing owl, pallid bat, long-eared owl, coast horned lizard, Le Conte's thrasher, and gray vireo. The property does not contain suitable habitat for the yellow warbler, Le Conte's thrasher, long-eared owls, gray vireo, or pallid bat. The area has suitable habitat for coast horned lizards and burrowing owls, but given the disturbance of the site and its location within the developed city of Victorville, these two species are not expected to inhabit the property. The site also does not contain any suitable burrows for burrowing owls, and no signs of owls (e.i. scat, feathers) were found on the property and are unlikely to inhabit the site in the future given the lack of occupiable burrows.

Future development activities include the grading and removal of all vegetation from the 3.18-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any active burrows. Two Joshua trees (a state candidate species) were observed in the field investigations during the site survey and will require a Western Joshua Tree Conservation Act permit if removed from the property. *This project falls within the standard fee area not the reduced fee area. Both of the trees that are on site are not 5 meters or over so they would not be \$2,544.75 each, they would be \$509.00 each.* In conformance with the standard fee schedule prescribed for the project area, mitigation. will consist of payment of \$2,544.75 for each western Joshua tree five meters or greater in height, \$509.00 for each western Joshua tree 1 meter or greater but less than 5 meters and \$346.00 for western Joshua trees less than 1 meter in height. The following mitigation measures would be required.

- Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of Project-related ground disturbance. a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged. b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.
- A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction. a. As required by the

San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible.

- Prior to grading, mitigation for direct impacts to the western Joshua trees within the project site will be fulfilled through the attainment of a Western Joshua Tree Conservation Act (WJTCA) Incidental Take Permit and a payment of the elected fees as described in Section 1927.3 of the WJTCA. In conformance with the reduced fee schedule prescribed for the project area, mitigation will consist of payment of \$2,544.75 for each western Joshua tree five meters or greater in height. *California Department of Fish and Wildlife determines the final fee.*

California Department of Fish and Wildlife determines the final fee. Alternatively, mitigation will occur as required by a Section 2081 Incidental Take Permit through off-site conservation, provided that a California Department of Fish and Wildlife-approved mitigation bank exists at the time the Section 2081 Incidental Take Permit application is filed.

The above mitigation measures would reduce the impacts to levels that are less than significant.

B. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.*

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site. A drainage channel was observed along the southern boundary of the site that runs west to east before its dead end at Balsam Road. It is the opinion of RCA Associates, Inc. that no additional surveys will be necessary given the lack of a nexus to a more significant body of water up or downstream. *As a result, the impacts would be less than significant.*

C. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site. A drainage channel was observed along the southern boundary of the site that runs west to east before its dead end at Balsam Road. It is the opinion of RCA Associates, Inc. that no additional surveys will be necessary given the lack of a nexus to a more significant body of water up or downstream. *As a result, the impacts would be less than significant.*

D. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? • No Impact.*

The site's utility as a habitat and a migration corridor is constrained due to the presence of the existing roadways and surrounding development that is present in the neighboring areas. *As a result, no impacts would occur.*

E. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation.*

The City of Victorville enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the city to assure the Joshua tree is not a “specimen” class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006). The City of Victorville’s Municipal Code (13.33) instructs to follow the County of San Bernardino’s ordinance (88.01.060). As a result, mitigation measures would be required. *With the implementation of the **Bio-3** mitigation measure, the impacts would be less than significant.*

F. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
• *No Impact.*

The proposed project’s implementation would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. *As a result, no impacts would occur.*

MITIGATION MEASURES

Future development activities include grading the property and removing vegetation from the 3.18-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) on site are expected to be negligible. This assumption is based on the suitable habitat located in the surrounding areas of the region. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any active burrows. Some mitigation measures that may be considered are:

BIO Mitigation #1 Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of Project-related ground disturbance. a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged. b. Pre-construction surveys shall encompass all areas within the potential footprint of disturbance for the project, as well as a reasonable buffer around these areas.

BIO-Mitigation #2 A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction. a. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible.

BIO-Mitigation #3 Prior to grading, mitigation for direct impacts to the western Joshua trees within the project site will be fulfilled through the attainment of a Western Joshua Tree Conservation Act (WJTCA) Incidental Take Permit and a payment of the elected fees as described in Section 1927.3 of the WJTCA. In conformance with the reduced fee schedule prescribed for the project area, mitigation

will consist of payment of \$2,544.75 for each western Joshua tree five meters or greater in height. California Department of Fish and Wildlife determines the final fee.

3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause substantial adverse change in the significance of a historical resource pursuant to §15064.5?				✘
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		✘		
C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?			✘	

SOURCES:

- BCR Consulting LLC. Cultural Resources Assessment. *Cottonwood and Pahute Project, Victorville, San Bernardino County, California*. December 21, 2021.
- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- U. S. Department of the Interior, National Park Service. National Register of Historic Places. <http://nrhp.focus.nps.gov>. 2010.
- U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed November 20, 2023.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.
- Victorville, City of. AB 52 Consultation Memorandums.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
- The proposed project would cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- The proposed project would disturb any human remains, including those interred outside of formal cemeteries.

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if

the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? • No Impact.*

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a

property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific, or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A cultural report conducted by BCR Consulting LLC, attached as an Appendix, found that artifacts with significant value were not found on the project site and its vicinity. A search was also done of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Victorville. The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the

National or State Register. The project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO). The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO). The project site is undisturbed and the existing developments in surrounding areas do not have any historical or cultural significance. The project's implementation will not impact any Federal, State, or locally designated historic resources. *As a result, no impacts would occur.*

B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? • Less than Significant Impact with Mitigation.*

The prehistoric cultural setting of the Mojave Desert has been organized into many chronological frameworks although there is no definitive sequence for the region. The difficulties in establishing cultural chronologies for the Mojave are a function of its enormous size and number of archaeological excavations conducted there. Moreover, throughout prehistory many groups have occupied the Mojave and their territories often overlap spatially and chronologically resulting in mixed artifact deposits. Due to dry climate and capricious geological processes, these artifacts rarely become integrated in-situ. Lacking a milieu hospitable to the preservation of cultural midden, Mojave chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as groundstone.

The SCCIC reported that no cultural resources have been previously identified within the project site. Additional resources reviewed included the National Register of Historic Places (National Register), the California Register, the Built Environmental Resource Directory (BERD), and documents and inventories published by the California Office of Historic Preservation. These include the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures. Findings were positive during the Sacred Lands File search with the NAHC. The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. The current study attempted to determine whether significant archaeological deposits were present on the proposed project site. Although none were yielded during the records search and field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface.

To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. On September 18, 2024, the City initiated consultation in compliance with AB 52, providing tribes with a copy of the Cultural Resources Assessment for the project. The City contacted the Morongo Band of Mission Indians, the Yuhaaviatam of San Manuel Nation, the Cabazon Band of Mission Indians, and the Twenty-Nine Palms Band of Mission Indians. The following tribes provided comments to the City: the Morongo Band of Mission Indians and the Yuhaaviatam of San Manuel Nation. The Morongo Band requested additional information regarding

grading which was provided. The Yuhaaviatam of San Manuel Nation requested the following mitigation measures be included in the IS/MND:

- In the event that cultural/paleontological 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 Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact 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.
- If significant pre-contact 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 YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
- If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

The Chemehuevi Indian Tribe did request consultation with the City which was implemented. *The aforementioned mitigation would reduce the impact to levels that are less than significant.*

C. Would the project disturb any human remains, including those interred outside of dedicated cemeteries? • Less than Significant Impact.

There are no dedicated cemeteries located in the vicinity of the project site. The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity. Notwithstanding, the following standard condition is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4): “A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.” Additionally, Section 5097.98 of the Public Resources Code states:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning the investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the

remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

As a result, the impact would be less than significant with the aforementioned standard condition.

MITIGATION MEASURES

The Yuhaaviatam of San Manuel Nation requested the following mitigation measures be included in the IS/MND:

CUL Mitigation #1. In the event that cultural/paleontological 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 Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact 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 Mitigation #2. If significant pre-contact 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 YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

CUL Mitigation #3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✘	
B. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✘	

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on energy resources if it results in any of the following:

- The proposed project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during the proposed project’s construction or operation.
- The proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? • Less than Significant Impact.*

The Southern California Edison (SCE) provides electricity to the City of Victorville. In 2020, As of 2019, approximately 35 percent of SCE’s power mix was sourced from renewable resources, including solar, wind, eligible hydroelectric, and geothermal. Approximately 32 percent of SCE’s power mix was purchased through open market transactions, and the remainder was sourced from natural gas, large hydroelectric, and nuclear resources. The increased demand is expected to be sufficiently served by the existing SCE electrical facilities. As shown in Table 5 the proposed project is anticipated to consume 1,779 kWh daily and 6,230 cubic feet of natural gas on a daily basis. as shown in Table 5.

Table 5 Proposed Project’s Electrical Consumption

Project Element	Consumption Rate	Daily Energy Consumption
Natural Gas (46,406 sq. ft.)	14 kWh/sq. ft./year	1,779 kWh/day
Electrical (46,406 sq. ft.)	49 cu. ft./sq. ft./year	6,230 cu. ft./day

Source: Bizenergy resources.com.

The proposed project would represent an insignificant percentage of the overall demand in the region. The proposed project would also be constructed pursuant to the 2022 energy conservation standards of Title 24; therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated and no mitigation measures are recommended. The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. *As a result, the impacts would be less than significant.*

B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? • Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings

reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project will be required to conform to all pertinent energy conservation requirements. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis determined that no mitigation measures will be required.

3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death?			✘	
i). Would the project, directly or indirectly, cause 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). Would the project, directly or indirectly cause strong seismic ground shaking?			✘	
iii). Would the project, directly or indirectly cause seismic-related ground failure, including liquefaction.				✘
iv). Would the project, directly or indirectly cause landslides?				✘
B. Would the project result in substantial soil erosion or the loss of topsoil?			✘	
C. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✘	
D. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✘	
E. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✘
F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✘		

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.*
- Google Earth. Site accessed February 12, 2024.
- San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan - July 13, 2017.*
- UC Davis. *SoilWeb.* Website accessed February 12, 2024.

- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on geology and soils if it results in any of the following:

- The proposed project would, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure, including liquefaction; and, landslides.
- The proposed project would result in substantial soil erosion or the loss of topsoil.
- The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- The proposed project would 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.
- The proposed project would 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.
- The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project's potential seismic and soils risk was evaluated in terms of the site's proximity to earthquake faults and unstable soils.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death?*

This Initial Study analyzes the environmental impacts associated with the construction and subsequent operation of a new 4 story extended stay hotel within a 3.18-acre site. The 4-story wood framed building would consist of 113 guestrooms. The proposed project would not include any restaurant facilities, meeting rooms, or other ancillary uses other than those uses that would be directly related to the hotel's operation. The project site is currently vacant.

i). *Would the project, directly or indirectly, cause rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; Refer to Division of Mines and Geology Special Publication 42. • No Impact*

The City of Victorville is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The City of Victorville is not on the list. The nearest fault to the project site is the Helendale Fault, which is located approximately 18 miles northeast of the City. *Therefore, no impacts would occur.*

ii). *Would the project, directly or indirectly, cause strong seismic ground shaking? • Less than Significant Impact.*

The effects of ground motion on structures are difficult to predict and depend on a variety of factors including the intensity of the quake, the distance from the epicenter to the site, the composition of soils and bedrock, building design, and other building characteristics. Based on these factors, ground shaking can result in minimal to significant damage. In general, peak ground accelerations and seismic intensity values decrease with increasing distance from the earthquake. Local conditions, such as soft soils, shallow ground water, and the presence of ridge tops, could amplify the effects of seismic waves and result in higher localized accelerations. The Uniform Building Code, California Building Code, and Unreinforced Masonry Law are the primary tools used by agencies to ensure seismic safety in structures. The City requires all new buildings to utilize reinforced masonry, as well as comply with the Uniform Building Code (UBC), which is expected to enable the proposed structures to resist major earthquakes without collapsing, although some structural damage could occur. The proposed new hotel would consist of four levels and conform to current seismic building codes. The new development would also be required to conform to the most current Building Code requirements. *As a result, the impacts would be less than significant.*

iii). *Would the project, directly or indirectly, cause seismic-related ground failure, including liquefaction? • No Impact.*

According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The potential for liquefaction generally occurs during strong ground shaking within granular loose sediments where the groundwater is usually less than 50 feet below the ground surface. As groundwater is anticipated to lie greater than 50 feet beneath the site and the site is underlain by relatively dense alluvial materials. Therefore, the risk for liquefaction is no greater on-site than it is for the region. The project site is not located within a liquefaction zone. *As a result, no impacts would occur.*

iv). *Would the project, directly or indirectly cause landslides? • No Impact.*

According to the United States Geological Survey, a landslide is defined as the movement of a mass of rock, debris, or earth down a slope. The project site is generally level though in areas it slopes gently to the south towards Pahute Avenue. *As a result, no impacts would occur.*

B. *Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is

underlain by soils belonging to the Cajon sand (slopes 0% to 2%) association. The proposed development will be located in the central portion of the City of Victorville. The project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped. The project's construction will not result in soil erosion with adherence to those development requirements that restrict stormwater runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under an NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. *As a result, the impacts would be less than significant.*

C. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? • Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction. The soils that underlie the project site provide a dense, high-strength soil layer to distribute the foundation loads over the underlying soils. Soils that exhibit certain shrink-swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. The likelihood of lateral spreading will be further reduced since the project's implementation will not require grading and excavation that would extend to depths required to encounter groundwater. Moreover, the project will not result in the direct extraction of groundwater. *As a result, the potential impacts would be less than significant.*

D. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? • Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils belonging to the Cajon sand (slopes 0% to 2%) association. According to the U.S. Department of Agriculture, these soils are acceptable for the development of commercial buildings. *As a result, the potential impacts would be less than significant.*

E. *Would the project 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 waste water? • No Impact.*

The proposed project would utilize existing sewer connections located on Cottonwood Avenue. No septic tanks will be used as part of the proposed project's implementation. *As a result, no impacts would occur.*

F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? • Less Than Significant Impact with Mitigation

According to Appendix C – Cultural Report, the geologic units underlying this project are mapped entirely as alluvial deposits dating from the Pleistocene epoch (Dibblee & Minch, 2008). Pleistocene alluvial units are considered to be of high paleontological sensitivity and are well known throughout southern California to contain abundant fossil resources. The Western Science Center does not have localities within the project area or within a 1-mile radius, but does have numerous localities throughout the region in similarly mapped alluvial units associated with mastodon (*Mammuthus columbi*), mammoth (*Mammuthus columbi*), ancient horse (*Equus* sp.), camel (*Camelops hesternus*) and many more. Any fossil specimens recovered from the Cottonwood and Pahute Project would be scientifically significant. Excavation activity associated with the development of the project area would impact the paleontologically sensitive Pleistocene sandstone units, and it is the recommendation of the Western Science Center that a paleontological resource mitigation program be put in place to monitor. Mitigation measures included in Section 3.5, would also address the potential for the discovery of paleontological resources. *As a result, the impacts would be less than significant with mitigation.*

MITIGATION MEASURES

A mitigation measure (*CUL Mitigation #1*) included in Section 3.5, would also address the potential for the discovery of paleontological resources that may be encountered during ground disturbance. This measure is listed below:

GEO Mitigation #1. In the event that cultural/paleontological 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 Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact 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.

3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✘	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✘	

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.

San Bernardino County Transportation Authority (SBCTA) Greenhouse Gas Reduction Plan

- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on greenhouse gas emissions if it results in any of the following:

- The proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- The proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion have elevated the concentrations of GHG in the atmosphere to above natural levels. These man-made GHG will have the effect of warming atmospheric temperatures with the attendant impacts of changes in the global climate, increased sea levels, and changes to the worldwide biome. The major GHG that influence global warming are described below.

- *Water Vapor*. Water vapor is the most abundant GHG present in the atmosphere. While water vapor is not considered a pollutant, while it remains in the atmosphere it maintains a climate necessary for life. Changes in the atmospheric concentration of water vapor is directly related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to “hold” more water when it is warmer), leading to more water vapor in the atmosphere.
- *Carbon Dioxide (CO₂)*. The natural production and absorption of CO₂ is achieved through the terrestrial biosphere and the ocean. Manmade sources of CO₂ include the burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700's, these activities have increased the atmospheric concentrations of CO₂. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm).
- *Methane (CH₄)*. CH₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO₂. Methane's lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO₂, N₂O, and Chlorofluorocarbons (CFCs)). CH₄ has both natural and anthropogenic sources.
- *Nitrous Oxide (N₂O)*. Concentrations of N₂O also began to increase at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen.
- *Chlorofluorocarbons (CFC)*. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the

Earth’s surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents.

- *Hydrofluorocarbons (HFC)*. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂).
- *Perfluorocarbons (PFC)*. PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth’s surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years.
- *Sulfur Hexafluoride (SF₆)*. SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF₆ has the highest global warming potential of any gas evaluated; 23,900 times that of CO₂. Concentrations in the 1990s were about 4 ppt.

The MDAQMD mass emissions corresponds to the SCAQMD’s adopted interim GHG thresholds for development projects within the South Coast Air Basin. According to the SCAQMD, the interim thresholds for industrial projects are 10,000 MTCO₂E per year.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.

In Table 6, the operational CO₂E is 1,887 MTCO₂E per year, which is well below the threshold. This figure does not take into account the implementation of *low impact development* (LID) requirements (drought tolerant landscaping, water efficient appliances, and energy efficient appliances) and compliance to Transportation Demand Management (TDM) requirements. *As a result, the potential impacts would be less than significant.*

Table 6 Greenhouse Gas Emissions

Source	GHG Emissions (MT/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ E
Long-Term (Operational) Emissions	1,809	0.75	0.05	1,887
Short-Term (Construction) Emissions	484	0.02	0.02	489
Significance Threshold Per Year				10,000

Source: CalEEMod V.2022.1.1.21

B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.

The City of Victorville GHG Climate Action Plan (CAP) Checklist provides guidance in selecting and accounting for the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. 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 maximum flexibility and options for how development projects can implement the GHG reduction measures. Table 7 presents a list of the GHG reduction measure options and the associated point values in the GHG Checklist.

Table 7 GHG Climate Action Plan Checklist (Relevant Commercial/Industrial)

Feature	Description	Point Value
Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	11
Windows	Enhanced Window Insulation (0.28 U-factor, 0.22 SHGC)	4
Cool Roofs	Enhanced Cool Roof (CRRC Rated 0.2 aged solar reflectance, 0.75 thermal emittance)	7
Air Infiltration	Blower Door HERS Verified Envelope Leakage or equivalent	6
Thermal Storage	Enhanced Thermal Mass (20% of floor or 20% of walls 12" or more thick exposed concrete or masonry with no permanent installed floor covering such as carpet, linoleum, wood or other insulating materials)	14
Heating/Cooling Distribution System	Enhanced Duct Insulation (R-8)	5
Space Heating/Cooling Equipment	Improved Efficiency HVAC (EER 14/78% AFUE or 8 HSPF)	4
Water Heaters	Improved Efficiency Water Heater (0.675 Energy Factor)	8
Daylighting	All rooms within the customer areas have daylight (through use of windows, solar tubes, skylights, etc.) such that each room has at least 800 lumens of light during a sunny day	1
Artificial Lighting	Efficient Lights (25% of in-unit fixtures considered high efficacy. High efficacy is defined as 40 lumens/watt for 15 watt or less fixtures; 50 lumens/watt for 15-40 watt fixtures, 60 lumens/watt for fixtures >40watt)	5
Appliances	Energy Star Appliances	2
Building Placement	North/South alignment of building or other building placement such that the orientation of the buildings optimizes natural heating, cooling, and lighting.	4
Shading	At least 90% of south-facing glazing will be shaded by vegetation or overhangs at noon on Jun 21st	6
Water Efficient Landscaping	Only California Native landscape that requires no or only supplemental irrigation	5
Water Efficient Irrigation Systems	Weather based irrigation control systems combined with drip irrigation (demonstrate 20 reduced water use)	3
Toilets	Water Efficient Toilets/Urinals (1.5gpm) & Waterless Urinals (note that commercial buildings having both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	6
Faucets	Water Efficient faucets (1.28gpm)	2
Cars	Level 3 480 volt AC Fast Chargers	8
Trucks	Level 3 DC Chargers for EV Class 8 (Heavy Duty) Truck	16
Total		117

Source: City of Victorville

The CAP Checklist that was completed for the proposed project (refer to Table 7) indicated the project would yield 117 points. Projects that yield 100 points pursuant to the City’s GHG Screening Tables methodology are considered to be consistent with the CAP. The proposed project would, therefore, be consistent with the CAP. Because the proposed project is consistent with the CAP, the impacts would be less than significant.

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was completed and finalized in March of 2014. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining

employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. According to the Citywide inventory completed for this planning effort, the primary sources of GHG emissions in Victorville are on-road transportation (52%), building energy (40%), and waste (6%). Emissions are projected to increase by 20% from 2016 to 2030 and by 42% from 2016 to 2045 due to economic and population growth. In 2016, Victorville had per capita emissions of 7.2 MTCO_{2e}, which is lower than the region's average per capita emissions of 7.5 MTCO_{2e}. The City Collaborates with the SBCTA Greenhouse Gas Reduction Plan that was recently updated in 2021.

The City Collaborates with the SBCTA Greenhouse Gas Reduction Plan that was recently updated in 2021. A GHG Screening Table was used to evaluate this project and is recommended by the GHG Reduction Plan to identify relevant mitigation. This section summarizes key general plan policies that support the City of Victorville's GHG reduction measures or would contribute to GHG reductions and sustainable practices in the City. All policies listed below are from the Victorville 2008 General Plan.

- *(Energy Efficiency) Implementation Measure 7.2.1.2:* Minimize energy use of new residential, commercial, and industrial projects by requiring high efficiency heating, lighting, and other appliances, such as cooking equipment, refrigerators, furnaces, overhead and area lighting, and low NO_x water heaters. This implementation measure is consistent with the proposed project.
- *(Energy Efficiency) Implementation Measure 7.2.1.1:* Incorporate green building principles and practices, to the extent practicable and financially feasible, into the design, development, and operation of all City owned facilities. This implementation measure is consistent with the proposed project though the new development is privately owned.
- *(Lighting Efficiency) Implementation Measure 7.2.1.10:* Incandescent lighting is discouraged for all new construction; all City facilities should replace incandescent lighting with CF or LED lighting unless light fixture does not exist for particular use. This implementation measure is consistent with the proposed project though the new development is privately owned.
- *(Renewable Energy) Implementation Measure 7.1.1.3:* Establish a photovoltaic target and require new construction to contribute to that target. This implementation measure is consistent with the proposed project. The use of solar panels is encouraged.
- *(Solar Energy) Implementation Measure 7.1.1.4:* Require all new commercial or industrial development to generate electricity on site to maximum extent feasible. This implementation measure is consistent with the proposed project.
- *(Water Efficient Landscaping) Policy 1.1.1:* Require water conservation measures in the design of new development and major redevelopment, for both public and private projects, such as low water consuming indoor plumbing devices and use of xerophytic landscape materials that require minimal irrigation. This implementation measure is consistent with the proposed project.

The project would not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. This project would not adversely affect the implementation of those policies. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation in that no GHG thresholds would be exceeded. As a result, no mitigation measures would be required.

3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✘	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✘	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✘	
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✘
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. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✘
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- CalEPA. *DTSC’s Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*. http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm.
- CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*. http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/
- Google Earth. Site accessed February 12, 2024.
- San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.
- Victorville, City of. Municipal Code. Municode. Victorville, CA. Chapter 10.30.200- Construction Projects. Website Accessed February 12, 2024.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hazards and hazardous materials if it results in any of the following:

- The proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- The proposed project would 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.
- The proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- The proposed project would 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.
- The proposed project would result in a safety hazard or excessive noise for people residing or working in the project area 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.
- The proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- The proposed project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in a wide variety of products (household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials can occur from a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.*

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols pertaining to Victorville Municipal code 10.30.200. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. *The impacts would be less than significant.*

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- B.** *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? • Less than Significant Impact.*
-

The project's construction would require the use of diesel fuel to power the construction equipment. The gasoline and diesel fuels would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols pertaining to the city's code of ordinance as mentioned in subsection A. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the City prior to the issuance of the Occupancy Permit. As a result, the likelihood of encountering contamination or other environmental concerns is remote. *The impacts would be less than significant.*

-
- C.** *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • Less than Significant Impact.*
-

The nearest school to the project site is Eucalyptus Elementary School, located approximately 1.8 miles to the southeast of the site. The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. As indicated in Subsection D, the project site is not listed in either the CalEPA's Cortese List or the Envirostor database. The chemicals used during construction would be transported and stored on-site during construction would be regulated by the EPA and the CalEPA. As a result, *the impacts would be less than significant.*

-
- D.** *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? • No Impact.*
-

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of DTSC Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site. *As a result, no impacts would occur.*

-
- E.** *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? • No Impact.*
-

The project site is not located within an airport land use plan. The nearest airport to the project site is the Southern California Logistics Airport is located approximately 7.2 miles northwest of the project site. The project will not introduce a structure that will interfere with the approach and take off airplanes utilizing any regional airports. *As a result, no impacts would occur.*

F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? • No Impact.

At no time will any adjacent street be completely closed to traffic during the proposed project’s construction. In addition, all construction staging must occur on-site. *As a result, no impacts would occur.*

G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? • No Impact.

The project site is located in a developing area and the adjacent properties directly north and west of the project site are developed. The project site is not located within a “moderate fire hazard severity zone” and Local Responsibility Area (LRA). *As a result, no impacts would result.*

MITIGATION MEASURES

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation measures would be required.

3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✘	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✘	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner or,			✘	
i). Would the project result in substantial erosion or siltation on- or off-site;			✘	
ii). Would the project substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site.			✘	
iii). Would the project 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). Would the project impede or redirect flood flows?			✘	
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✘
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.

- Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2022
- Google Earth. Site accessed February 12, 2024.
- San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on hydrology and water quality if it results in any of the following:

- The proposed project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- The proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- The proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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, impede or redirect flood flows.
- The proposed project would risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.
- The proposed project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? • Less than Significant Impact.*

The easternmost portion of the project site would include four stormwater retention basins (referred to as Basin A1 through A4). Basin A1 would have a retention volume of 3,115 cubic feet, Basin A2 would have a retention volume of 564 cubic feet, Basin A3 would have a retention volume of 1,536 cubic feet, and Basin A4 would have a retention volume of 2,510 cubic feet. The site would be designed so that stormwater runoff would be retained onsite. The project Applicant will be required to adhere to Chapter 10.30.210 - Erosion and Sediment Control, of the municipal code that regulates erosion and sediment control. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. *As a result, the impacts would be less than significant.*

B. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.*

No new direct construction-related impacts to groundwater supplies, or groundwater recharge activities would occur as part of the proposed project's implementation. Water used to control fugitive dust will be transported to the site via truck. No direct groundwater extraction would occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. As a result, there would be no direct groundwater withdrawals associated with the proposed project's implementation. *As a result, the impacts would be less than significant.*

C. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces? • Less than Significant Impact.*

As mentioned in subsection B, the proposed project's location will be restricted to the proposed project site and will not alter the course of any stream or river that would lead to on- or off-site siltation or erosion. The site would be designed so the proposed hardscape surfaces (the building and paved areas) would consist of about 90% of the project site. *As a result, the impacts would be less than significant.*

i). *Would the project result in a substantial erosion or siltation on- or off-site; • Less than Significant Impact.*

The project applicant will be required to abide by Victorville's City Ordinance Chapter 10.30.210 that requires all applicants for projects involving construction activities, regardless of size, to submit an erosion and sediment control plan ("ESCP") to the City for review and approval as mentioned in subsection A. *As a result, the impacts would be less than significant.*

ii). *Would the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite • Less than Significant Impact.*

The project's construction and operation will be restricted to the designated project site and the project will not increase the amount of any stream or river that would lead to on- or off-site siltation or erosion. Once implemented, the proposed project will change the site's drainage characteristics. The easternmost portion of the project site would include four stormwater retention basins (referred to as Basin A1 through A4. Basin A1 would have a retention volume of 3,115 cubic feet, Basin A2 would have a retention volume of 564 cubic feet, Basin A3 would have a retention volume of 1,536 cubic feet, and Basin A4 would have a retention volume of 2,510 cubic feet. The site would be designed so that stormwater runoff would be retained onsite. The project applicant will be required to abide by Victorville's City Ordinance Chapter 10.30.210 that requires all applicants for projects involving construction activities, regardless of size, to submit an erosion and sediment control plan ("ESCP") to the city for review and approval as mentioned in subsection A. *As a result, the impacts would be less than significant.*

iii). *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; • Less than Significant Impact.*

The project’s construction would be restricted to the site and would not alter the course of any stream or channel or river that would lead to on- or off-site siltation or erosion. The proposed improvements would be in compliance with City standards. *As a result, the impacts would be less than significant.*

iv). *Would the project impede or redirect flood flows? • Less than Significant Impact.*

The proposed project is situated in a Zone X flood zone, an area of minimal flood hazard. The nearest flood zone, the Mojave river, is situated approximately 4.5 miles to the east and the project’s construction and operation will be restricted to the project site. *As a result, the impacts would be less than significant.*

D. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? • No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Victorville, the proposed project site is not located within a Flood Hazard zone. The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. In addition, the project site is located inland approximately 65 miles from the Pacific Ocean and the project site would not be exposed to the effects of a tsunami. *As a result, no impacts would occur.*

E. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? • No Impact.*

The proposed project is required to be in compliance with Chapter 10.30.210 of the City of Victorville Municipal Code. This section requires new developments to comply with all pertinent storm water runoff requirements. In addition, the project’s operation would not interfere with any groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. *As a result, no impacts would occur.*

MITIGATION MEASURES

As indicated previously, hydrological characteristics will not substantially change as a result of the proposed project. As a result, no mitigation is required.

3.11 LAND USE PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				×
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			×	

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.

- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would 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.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project physically divide an established community?* • *No Impact.*

The site is currently vacant and undeveloped. An aerial photograph of the site and the surrounding area is provided in Exhibit 3. The vegetation community present on site supports a moderately disturbed Mojave Desert Scrub habitat encompassing mainly native plants, including Joshua trees, and some non-native grasses. The project site's General Plan designation is *Commercial* and it is zoned as *General Commercial (C-2)*. Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* An existing Hilton Garden Inn and the High Desert Wellness: Integrative Psychotherapy and Holistic Health facility are located to the north of the project site. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.
- *East of the project site:* A vacant lot is located to the east of the project site. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.
- *South of the project site:* Pahute Avenue extends along the project site's south side. A vacant lot and the Azusa Pacific High Desert campus is located to the south of the project site, south of Pahute Avenue. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.
- *West of the project site:* Cottonwood Avenue extends along the project site's west side. Various commercial businesses are located to the west of the project site, on the west side of Cottonwood Avenue. This area is designated as *Commercial* in the City of Victorville General Plan and is zoned as *General Commercial (C-2)* in the City of Victorville zoning map.

The land uses for the site and the surrounding area are summarized in Table 8.

Table 8 Existing Land Use and Land Use Zoning Districts

Location	Existing Land Use	General Plan	Zoning
Project Site	Vacant land	Commercial	General Commercial (C-2)
North	Hotel	Commercial	General Commercial (C-2)
South	Pahute Ave. & Commercial	Commercial	General Commercial (C-2)
East	Vacant land	Commercial	General Commercial (C-2)
West	Cottonwood Ave. & Commercial	Commercial	General Commercial (C-2)

The granting of the requested entitlements and subsequent construction of the proposed project would not result in any expansion of the use beyond the current boundaries. As a result, the project would not lead to any division of an existing established neighborhood. *As a result, no impacts would occur.*

B. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? • Less than Significant Impact.*

The project site’s General Plan designation is *Commercial* and it is zoned as *General Commercial (C-2)*.The [proposed project’s conformity with the applicable land use designation is summarized below in Table 9.

Table 9 Project’s Conformity with C-2 Zone District

Zoning Standard	Requirement	Project, Conformity?
Maximum Lot Coverage	60%	8% (Yes)
Minimum Lot Size	10,000 sq. ft.	138,325 sq. ft. (Yes)
Minimum Lot Width	75 ft.	300 ft. +/- Yes
Minimum Lot Depth	Not Applicable	600 ft. +/- Yes
Minimum Front Yard Setback	10 ft.	101.23 ft +/- (Yes)
Street Side Yard Setback	10 ft.	85.1 ft. (Yes)
Interior & Rear Yard Setback	None	163 ft. + (Yes)
Maximum Building Height	45 ft.	45 feet (Yes)

Source: City of Victorville Zoning Ordinance.

Pursuant to Section 16-3.07.010 (Permitted and Conditional Land Uses-all zoning districts), hotel uses are conditionally permitted in the C-2 zone district and prohibited in the C-2 zone district. The following discretionary approvals are required: the approval of a Conditional Use Permit for the operation of the hotel and a site plan review. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.

3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✘
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, acting as Lead Agency, a project may be deemed to have a significant adverse impact on mineral resources if it results in any of the following:

- The proposed project would physically divide an established community.
- The proposed project would 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.

According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1)*: This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2)*: This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3)*: This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgrade it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4)*: This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? • No Impact.

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells on-site or located in the vicinity of the project site. The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site. As indicated previously, the site is undeveloped and there are no active mineral extraction activities occurring on-site or in the adjacent properties. *As a result, no impacts will occur.*

B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? • No Impact.

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. *As a result, no impacts will occur.*

MITIGATION MEASURES

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✘		
B. Would the project result in 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?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.

- Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2022
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on noise if it results in any of the following:

- The proposed project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- The proposed project would result in the generation of excessive ground borne vibration or ground borne noise levels.
- For a proposed 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?

Noise levels may be described using a number of methods designed to evaluate the “loudness” of a particular noise. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the threshold for human sensitivity. Noise level increases of 3.0 dB or less are not generally perceptible to persons with average hearing abilities. The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* • *Less than Significant Impact with Mitigation.*

The primary sources of noise in the Victorville planning area are freeways and roadways, railroad traffic, SCLA aircraft operations, and stationary sources. The predominant source of noise in the vicinity of the project site is traffic noise emanating from the I-15 Freeway. Future sources of noise generated on-site will include noise from vehicles traveling to and from the hotel and noise emanating from building equipment noise (air conditioning units, and other equipment), and other noises typically associated with commercial development. The most commonly used unit for measuring the level of sound is the decibel (dB). The City of Victorville Noise Control Ordinance includes the following requirements with respect to noise exposure and control:

- *13.01.050 - Noise levels prohibited.* Noise levels shall not exceed the ambient noise levels in Section 13.01.040 by the following dB(A) levels for the cumulative period of time specified: Less than 5dB(A) for a cumulative period of more than thirty minutes in any hour; Less than 10 dB(A) for a

cumulative period of more than fifteen minutes in any hour; Less than 15 dB(A) for a cumulative period of more than five minutes in any hour; Less than 20 dB(A) for a cumulative period of more than one minute in any hour; 20 dB(A) or more for any period of time.

- *13.01.060 - Noise source exemptions.* The following activities shall be exempted from the provisions of this chapter: All mechanical devices, apparatus or equipment used, related to, or connected with emergency machinery, vehicle, or work. The provisions of this regulation shall not preclude the construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation projects, public works projects or essential public works services and facilities, including those utilities subject to the regulatory jurisdiction of the California Public Utilities Commission. Activities conducted on the grounds of any elementary, intermediate, or secondary school or college. Outdoor gatherings, public dances and shows, provided said events are conducted pursuant to a permit as required by this code. Activities conducted in public parks and public playgrounds, provided said events are conducted pursuant to a permit as required by this code. Any activity to the extent regulation thereof has been preempted by state or federal law. Trac on any roadway or railroad right-of-way. The operation of the Southern California Logistics Airport. Construction activity on private properties that are determined by the director of building and safety to be essential to the completion of a project.
- *13.01.070 - Notice and penalties.* Any person violating any of the provisions or failing to comply with the requirements of this chapter, is guilty of a civil penalty, punishable in accordance with Chapter 1.05. In addition, in the discretion of the city attorney and based upon the specific facts and circumstances presented to him or her, any such violation may be charged as an infraction subject to the penalties contained in Section 1.04.010. The only short-term construction noise will be limited to the grading during the site preparation phases and the erection of the new buildings.

The following mitigation will be required in order to further reduce construction and operational noise:

- The Applicant must ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.
- Construction vehicles will be prohibited from traveling on local streets in the residential areas.
- Loitering in the hotel's parking areas with attendant loud noise (radios, car noise, etc.) will not be permitted.

Adherence to the aforementioned mitigation measures will reduce the potential noise impacts to levels that are less than significant.

B. Would the project result in generation of excessive groundborne vibration or groundborne noise levels? • Less than Significant Impact with Mitigation.

The construction of the proposed project will result in the generation of vibration and noise, though the vibrations and noise generated during the project's construction will not adversely impact the nearby residential sensitive receptors. The background vibration velocity level in residential areas is usually around 50 vibration velocity level (VdB). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximately dividing line between barely perceptible and distinctly perceptible levels for many people. Ground vibrations associated with construction activities using modern construction methods and equipment rarely reach the levels that result in damage to nearby buildings though vibration related to construction activities may be discernible in areas located near the construction site. A possible exception is in older buildings where special care must be

taken to avoid damage. Table 10 summarizes the levels of vibration and the usual effect on people and buildings.

Table 10 Common Effects of Construction Vibration

Peak Particle Velocity (in/sec)	Effects on Humans	Effects on Buildings
<0.005	Imperceptible	No effect on buildings
0.005 to 0.015	Barely perceptible	No effect on buildings
0.02 to 0.05	Level at which continuous vibrations begin to annoy occupants of nearby buildings	No effect on buildings
0.1 to 0.5	Vibrations are considered unacceptable for persons exposed to continuous or long-term vibration.	Minimal potential for damage to weak or sensitive structures
0.5 to 1.0	Vibrations considered bothersome by most people, tolerable if short-term in length	Threshold at which there is a risk of architectural damage to buildings with plastered ceilings and walls. Some risk to ancient monuments and ruins.
>3.0	Vibration is unpleasant	Potential for architectural damage and possible minor structural damage

Source: U.S. Department of Transportation

Typical levels from vibration generally do not have the potential for any structural damage. Some construction activities, such as pile driving and blasting, can produce vibration levels that may have the potential to damage some vibration sensitive structures if performed within 50 to 100 feet of the structure. The reason that normal construction vibration does not result in structural damage has to do with several issues, including the frequency vibration and magnitude of construction related vibration. Unlike earthquakes, which produce vibration at very low frequencies and have a high potential for structural damage, most construction vibration is in the mid- to upper- frequency range, and therefore, have a lower potential for structural damage. The data in Table 4 does provide a reasonable estimate for a wide range of soil conditions. Based on Transit Noise and Vibration Impact Assessment, a vibration level of 102 VdB (vibration decibels, or 0.5 inches per second [in/sec]) is considered safe and would not result in any construction vibration damage. Strict adherence to the mitigation provided below will reduce the number of units and residents potentially affected by ground-borne vibration generated by empty haul trucks:

Adherence to the aforementioned mentioned mitigation will reduce potential vibration impacts to levels that are less than significant. Once operational, the proposed project will not generate excessive ground-borne noise. The project will be required to adhere to all pertinent City noise control regulations. In addition, the cumulative traffic associated with the proposed project will not be great enough to result in a measurable or perceptible increase in traffic noise (it typically requires a doubling of traffic volumes to increase the ambient noise levels to 3.0 dBA or greater). Once in operation, the proposed project would not significantly raise ground borne noise levels. *The above required mitigation measures will reduce the impacts to levels that would be less than significant.*

C. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? • No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or private airport. The project site is located approximately 6.3 miles southeast of the Southern

California Logistics Airport. The proposed use is not considered to be a sensitive receptor. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport use. *As a result, no impacts would occur.*

MITIGATION MEASURES

The following mitigation will be required in order to further reduce construction noise:

NOI Mitigation #1. The Applicant must ensure that the contractors use construction equipment that includes working mufflers and other sound suppression equipment as a means to reduce machinery noise.

To ensure the project’s potential noise impacts are mitigated, the following mitigation measures must be implemented:

NOI Mitigation #2. Loitering in the parking areas with attendant loud noise (radios, car noise, etc.) will not be permitted.

Strict adherence to the mitigation provided below will reduce the number of units and residents potentially affected by ground-borne vibration generated by construction vehicles:

NOI Mitigation #3. Construction vehicles will be prohibited from travelling on local streets in the residential areas. All construction vehicles must travel on Cottonwood Avenue Drive to access the site.

3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✘
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on population and housing if it results in any of the following:

- The proposed project would induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

- The proposed project would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? • No Impact.*

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently vacant.
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only.
- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only. At present, existing water sewer connections will need to be extended to serve the project site. The project's potential utility impacts are analyzed in Section 3.19.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.
- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in an increase in employment which can be accommodated by the local labor market but will not result in a change in population growth.
- *Short-term growth-inducing impacts related to the project's construction.* The project would result in temporary employment during the construction phase.

The proposed project will utilize existing roadways and infrastructure. The newly established roads and existing utility lines will serve the project site only and will not extend into undeveloped areas. The proposed project would not result in any unplanned growth. *As a result, no impacts would result.*

B. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? • No Impact.*

The project site and the adjacent parcels has a zoning designations of *General Commercial (C-2)*. No housing units would be permitted, and none will be displaced as a result of the proposed project's

implementation. As a result, no impacts would result.

MITIGATION MEASURES

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation measures are required.

3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i). Would the project result in substantial adverse physical impacts associated with Fire protection?			✘	
ii). Would the project result in substantial adverse physical impacts associated with Police protection?		✘		
iii). Would the project result in substantial adverse physical impacts associated with Schools?			✘	
iv). Would the project result in substantial adverse physical impacts associated with Parks?			✘	
v). Would the project result in substantial adverse physical impacts associated with Other public facilities?			✘	

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on public services if it results in any of the following:

- The proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts,

in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks or other public facilities.

ANALYSIS OF ENVIRONMENTAL IMPACTS

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

The City of Victorville is reviewing an application to construct and operate a new 4 story extended stay hotel within a 3.18-acre site. The 4-story wood framed building would consist of 113 guestrooms. The proposed hotel would be an “extended stay” hotel. The proposed project would not include any restaurant facilities, meeting rooms, or other ancillary uses other than those uses that would be directly related to the hotel’s operation. The total number of proposed parking spaces on the project site would be 118 parking spaces including 113 standard spaces and 5 ADA compliant parking spaces. The parking areas would be located around the proposed hotel building and along the north, south, and west sides. Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue. Landscaping would total 63,099 square feet and would be provided around the site’s perimeter, along the site frontages, and around the hotel building.

i). *Would the project have fire protection? Less than Significant Impact.*

The City of Victorville is served by the Victorville Fire Department that operates out of five stations. The Department operates a fleet of four Medic Engines, one medic truck, and one Medic squad. The staff consists of 51 firefighting personnel. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City Fire officials to ensure adequate fire service and safety as a result of project implementation. *As a result, the impacts would be less than significant.*

ii). *Would the project have police protection? Less than Significant Impact with Mitigation.*

Law enforcement services within the City are provided by the San Bernardino County Sheriff’s Department (Victorville Police Department) which serves the community from one station located at 14200 Armargosa Road. The staff of the Victorville Police Department operates a Gang detail, Traffic detail, Multiple Enforcement Team, School Resource Officers, CPS/APS officers, and a Reserve Deputy unit. The Victorville Police Department is responsible for providing public safety services to a geographical area of over 74 square miles and to a population of approximately 135,000 residents. The proposed project will

also be required to comply with the City's security requirements. The development could place additional demands on law enforcement services due to the nature of the project. The proposed project's use may result in an increased demand on law enforcement and mitigation would be required. The aforementioned mitigation will reduce the potential impacts. *As a result, the impacts would be less than significant.*

iii). *Would the project be near schools? Less than Significant Impact.*

The nearest school to the project site is Mojave Vista Elementary School located approximately 1.45 miles to the northeast. Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. The proposed hotel development will be required to pay school impact fees (\$0.78 per square foot for commercial development). *As a result, the impacts would be less than significant.*

iv). *Would the project be near parks? Less than Significant Impact.*

The nearest park to the project site is Mojave Vista Park located approximately 1.58 miles to the east of the project site. The proposed project will not result in any local increase in residential development (directly or indirectly) that could potentially impact the local recreational facilities. *As a result, the impacts would be less than significant.*

v). *Would the project have other public facilities? Less than Significant Impact.*

The proposed project would not create direct local population growth that could potentially create demand for other governmental service. No housing units will be displaced or constructed as part of the proposed project's implementation. *As a result, the impacts would be less than significant.*

MITIGATION MEASURES

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, for the majority of the public service issues. The following mitigation was recommended to address security:

PUB Mitigation #1. A security plan must be submitted to the City and/or Sheriff's Department prior to issuance of any occupancy permits.

PUB Mitigation #2. Exterior lighting (i.e., for internal drive aisles, parking areas, and the drive-thru) shall be illuminated in a manner meeting the approval of the Sheriff's Department.

PUB Mitigation #3. Landscape plants shall be designed to permit unobstructed visual access to the project site.

3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				×
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				×

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on recreation if it results in any of the following:

- The proposed project would 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.
- The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* • No Impact.

The nearest park to the project site is Mojave Vista Park located approximately 1.58 miles to the east of the project site. Due to the commercial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts would occur.

B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?* • No Impact.

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation measures are required.

3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a program, plan, or ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✘	
B. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?			✘	
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✘	
D. Would the project result in inadequate emergency access?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on transportation and circulation if it results in any of the following:

- The proposed project would conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- The proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- The proposed project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- The proposed project would result in inadequate emergency access.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. Would the project conflict with a program, plan, or ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? • Less than Significant Impact.

Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site to the north side of Pahute Avenue. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue. The total number of proposed parking spaces on the project site would total 118 parking spaces including 113 standard parking spaces and 5 ADA compliant parking spaces. The parking areas would be located around the proposed hotel building and along the north, south, and west sides. The City’s parking requirements call for 1 space per guest room plus 5 additional spaces, a total of 118 spaces. The proposed project will adhere to this requirement.

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes expected to be generated by the proposed project were estimated for the weekday commuter AM and PM peak hours, as well as over a 24-hour daily period, using trip generation rates provided by the Institute of Transportation Engineers’ (ITE) Trip Generation Manual, 11th Edition. The ITE document contains trip rates for a variety of land uses which have been derived based on traffic counts conducted at existing sites throughout California and the United States. The projected trip generation for the proposed project are summarized in Table 11.

Table 11 Project Trip Generation

Use	Size/Quantity	Daily	AM Peak Hour	PM Peak Hour
Hotel Land Use Category (ITE 310)				
Rates (per Rooms)	113 rooms	7.99	0.46	0.59
Total Project Trips		903	52	67

As indicated in Table 11, the proposed project would result in 903 daily trips with 52 trips occurring during the morning (AM) peak hour and 67 trips occurring during the evening (PM) peak hour. Compared to other types of commercial land uses, the traffic generation rates are much lower. *Therefore, the potential impacts are anticipated to be less than significant. Therefore, the potential impacts would be less than significant.*

B. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? • Less than Significant Impact.

The City of Victorville adopted Resolution No. 20-031 which adopted local VMT threshold guidelines for analyzing development projects pursuant to CEQA. Projects that will not require a VMT analysis can be screened using either the daily vehicle trips generated by project or the project’s land use type. For this project, land use was used for the screening. According to the City’s thresholds a VMT analysis would not be required if it resulted in a net increase of 1,285 daily trips. The proposed project does not meet this threshold. The project would result in 903 daily trips. The project is, therefore, in compliance with Section

15064.3. *As a result, the impacts would be less than significant.*

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

Vehicular access to the site would be provided by two driveway connections. One 30-foot driveway would be located in the southeast of the site connecting to the north side of Pahute Avenue. The second 30-foot driveway would be located in the western portion of the site connecting to the east side of Cottonwood Avenue. The proposed project would not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. *As a result, the potential impacts would be less than significant.*

D. Would the project result in inadequate emergency access? • No Impact.

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction would adjacent streets (Cottonwood Avenue or Pahute Avenue) be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts would occur.*

MITIGATION MEASURES

The traffic analysis determined that no mitigation measures would be required.

3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Would the project have listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				×
ii). Would the project have resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American.		×		

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.

- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.
- Victorville, City of. AB 52 Consultation Memorandums.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on tribal cultural resources if it results in any of the following:

- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
- The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:* • *Less than Significant Impact with Mitigation.*

A *Tribal Resource* is defined in Public Resources Code section 21074 and includes the following:

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

- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

i). *Would the 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), • No Impact.*

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. The project site is not listed in the Register. *As a result, no impacts would occur.*

ii). *Would the project have a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? • Less than Significant Impact with Mitigation.*

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. On September 18, 2024, the City initiated consultation in compliance with AB 52, providing tribes with a copy of the Cultural Resources Assessment for the project. The City contacted the Morongo Band of Mission Indians, the Yuhaaviatam of San Manuel Nation, the Cabazon Band of Mission Indians, and the Twenty-Nine Palms Band of Mission Indians. The following tribes provided comments to the City: the Morongo Band of Mission Indians and the Yuhaaviatam of San Manuel Nation. The Morongo Band requested additional information regarding grading which was provided. The Yuhaaviatam of San Manuel Nation requested the following mitigation measures be included in the IS/MND:

- The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact 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 shall 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.

- 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.

The aforementioned mitigation would reduce the impact to levels that are less than significant.

MITIGATION MEASURES

The following mitigation measures are required as a means to reduce potential tribal cultural resources impacts to levels that are less than significant:

TCR Mitigation #1. The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact 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 shall 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 Mitigation #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.

3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✘	
B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✘	
C. Would the project result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✘	
D. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✘	
E. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

THRESHOLDS OF SIGNIFICANCE AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, a project may be deemed to have a significant adverse impact on utilities if it results in any of the following:

- The proposed project would require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- The proposed project would 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.
- The proposed project would negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals.
- The proposed project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project 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? • Less than Significant Impact.*

There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped and has existing electrical, sewer and water connections adjacent to the project site. The proposed project's connection can be adequately handled by the existing infrastructure. *As a result, the impacts would be less than significant.*

B. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? • Less than Significant Impact.

The project site and the surrounding area is under the jurisdiction of the Mojave Water Agency (MWA). The proposed hotel development would connect to an existing 12-inch sanitary sewer line in Pahute Avenue and Cottonwood Avenue. The project would connect to an existing 12-inch water line in Cottonwood Avenue. The anticipated water demand (21,470 gallons/day) for the proposed project is summarized in Table 12. The applicant has obtained a “will-serve” letter from the Victorville Water Department (VWD) in order to ensure water can be served to the site. The proposed project will be required to implement all pertinent water conservation measures. *As a result, the impacts would be less than significant.*

Table 12 Projected Water Consumption

Project Element	Consumption Rate	Project Consumption
Hotel (113 rooms)	190 gals/day/room	21,470 gals/day
Total		21,470 gals. /day

Source: <https://sustainablehospitalityalliance.org/>

C. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? • Less than Significant Impact.

Table 13 indicates the proposed projects anticipated effluent generation rate would be 17,176 gallons per day. With the implementation of the City's Capital Improvement Program & Sewer Master Plan System, as well as recent and planned expansions of the Southern California Logistics Airport (SCLA) Industrial Wastewater Treatment Plant, it is anticipated that the impacts of this project will be minimal. Additionally, if applicable, the proposed development will pay associated development impact fees to the City and/or the SCLA fund the ongoing maintenance and expansion/construction of treatment facilities. Therefore, the SCLA should have adequate capacity to serve the projects projected demand in addition to the provider's existing commitments in conjunction with associated fees and existing plans, as applicable and as needed. The proposed hotel development would connect to an existing 12-inch sanitary sewer line in Pahute Avenue and Cottonwood Avenue. The project would connect to an existing 12-inch water line in Cottonwood Avenue. *As a result, the impacts would be less than significant.*

Table 13 Projected Effluent Generation

Project Element	Generation Rate	Project Generation
Hotel (80% of total water consumption)	80% of water consumption	17,176 gals. /day
Total		17,176 gals. /day

Source: <https://sustainablehospitalityalliance.org/>

D. Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? • Less than Significant Impact.

Table 14 indicates the proposed projects anticipated to generate 452 pounds of solid waste on a daily basis. The City of Victorville utilizes the Victorville Landfill for solid waste disposal. This landfill is operated by the Solid Waste Management Division of the San Bernardino County Public Works Department in accordance with a Waste Disposal Agreement between the City and the County. The Victorville landfill currently operates on 67-acres of a total 491-acre property with a capacity of 1,180 tons per day. With a planned expansion, as summarized in a Joint Technical Document prepared by the Solid Waste Management Division, the overall capacity will rise to 3,000 tons per day by expanding from a 67-acre operation to an approximately 341-acre operation. The planned expansion and additional daily acceptance capabilities, as well as the required construction waste management plan enforced during construction will accommodate the proposed solid waste generation. *As a result, the impacts would be less than significant.*

Table 14 Projected Solid Waste Generation

Project Element	Generation Rate	Project Generation
Hotel (113 rooms)	4.0 lbs./day/room	452 lbs./day
Total		452 lbs./day

Source: Blodgett Baylosis Environmental Planning

The proposed project, like all other development in Victorville and San Bernardino County, would be required to adhere to City and County ordinances with respect to waste reduction and recycling. *As a result, no impacts would occur.*

MITIGATION MEASURES

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation is required.

3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				✘
B. Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✘
C. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✘
D. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✘

SOURCES:

- Blodgett Baylosis Environmental Planning. Site survey. Survey conducted on January 30, 2024.
- Google Earth. Site accessed February 12, 2024.
- Victorville, City of. *General Plan Update*. <https://www.victorvilleca.gov/government/city-departments/development/planning/city-of-victorville-general-plan>.

ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? • No Impact.*

Surface streets that would be improved as part of the proposed project's construction would serve the project site and the adjacent area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets (Cottonwood Avenue and Pahute Avenue) be completely closed to traffic. All construction staging must occur on-site. *As a result, no impacts would occur.*

B. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • No Impact.*

The project site is located in the midst of a developing area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles northeast and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. *As a result, no impacts would occur.*

C. *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

The project site is not located in an area that is classified as a moderate fire risk severity within a Local Responsibility Area (LRA), and therefore will not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. *As a result, no impacts would occur.*

D. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

There is limited risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the site is not located within a moderate fire risk and local responsibility area. The proposed project site is located within an area classified as built-up with development directly north of the site. Therefore, the project will not expose future

employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes. As a result, no impacts would occur.

MITIGATION MEASURES

The analysis of wildfire impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- A.** The proposed project *will not* 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. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.
- B.** The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.
- C.** The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.



SECTION 4. CONCLUSIONS

4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* 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 an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

4.2 MITIGATION MONITORING

In addition, pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincidental to the approval of a Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180 and in compliance with the requirements of the Public Resources Code. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the City of Victorville can make the following finding that a mitigation monitoring and reporting program will be required.



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SECTION 5. REFERENCES

5.1 PREPARERS

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5.2 REFERENCES

The references that were consulted have been identified using footnotes.



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