

**INITIAL STUDY  
ENVIRONMENTAL CHECKLIST FORM**

1. **Project title:** Capital Improvement Project No. BM19-125 - New 1 MG Reservoir
2. **Lead agency name and address:** City of Victorville Engineering Department, PO Box 5001, Victorville, California 92393-5001.
3. **Contact person and phone number:** Victor J. Fajardo, P.E. Senior Civil Engineer, (760) 243-6311
4. **Project location:** 18003 Westwind Rd, Victorville, CA 92394
5. **Project sponsor's name and address:** Victorville Water District 14343 Civic Dr, Victorville, CA 92392
6. **Specific plan designation:** Public/Open Space (P/OS)
7. **Zoning:** Public/Open Space (P/OS)
8. **Description of project:** The Proposed Project is a reclaimed water storage tank located at the Southern California Logistics Airport (SCLA) (see Figure 1 Regional Location) and identified in the Victorville Water District's Capital Improvement Project as No. BM19-125. Specifically, the Project Site is located east of Westwind Road and south of Montana Street within an abandoned Base Housing development associated with George Air Force Base (see Figure 2 Site Vicinity). The Proposed Project is within the City of Victorville (City) and will be funded solely by the Water District acting as the CEQA Lead Agency for the Proposed Project. The District is governed by a five-member Board of Directors, which are also members of the City of Victorville City Council. The District is considered a subsidiary district of the City.

The Proposed Project will consist of replacing the in-ground lined pond with a new 1 million-gallon (MG) prestressed circular reservoir and re-locating the underground piping and the pumps as necessary. The existing pond is designed to hold approximately 600,000 gallons of water and, upon completion of the tank, the pond would be backfilled and abandoned (see Figure 3 Project Design Plans).

End users would continue to be industrial tenants of the SCLA. The water is treated to meet California Code of Regulations Title 22 of California's Water Recycling Criteria that includes State guidelines for how treated and recycled water is discharged and used. Title 22 includes specific uses allowed with disinfected tertiary recycled water (such as irrigating parks), uses allowed with disinfected secondary recycled water (such as irrigating animal feed and other unprocessed crops), and uses allowed with undisinfected secondary recycled water (such industrial uses). The tertiary recycled wastewater to be stored in the new tank would be from the Victor Valley Wastewater Agency's tertiary plant on Shay Road in Victorville and on occasion SCLA Industrial Wastewater Treatment Plant water may also be stored in the new tank and would be used for irrigation and other non-domestic industrial uses.

The Proposed Project includes connection to existing 16" water main and a proposed new 12" water main to serve as back up to supply recycled water to the tank. The new pipeline would be constructed within the Base Housing street system and within the north side of Air Expressway to the south of the tank location (see Figure 3 Site Plan). Any old galvanized steel piping not re-used for the Proposed Project would be abandoned in-place; no asbestos pipe would be left in place or





## REGIONAL LOCATION

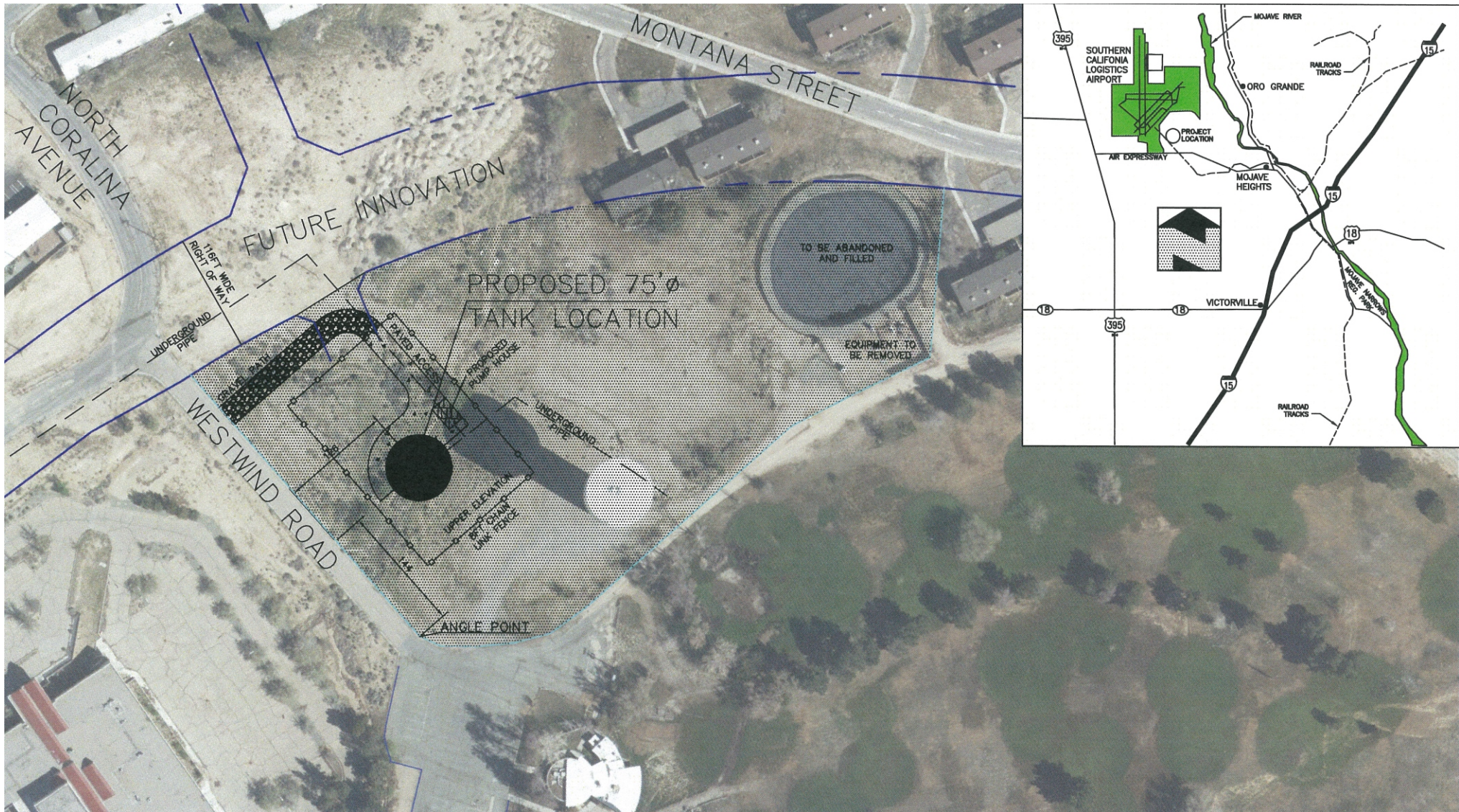
Capital Improvement Project No. BM19-125 - New 1 MG Reservoir  
Victorville, California

FIGURE 1











removed. Existing equipment, including pumps at the storage pond would be relocated to a pad constructed for the water tank and within a fenced area for security.

The estimated diameter of the tank is 75 feet; the area of disturbance including trenching, footings and construction area would be an approximate total diameter of 85 feet. The tank will be approximately 34 feet in height and approximately 24 feet will be buried below existing grade (top of tank at elevation 2,883 mean sea level [MSL]). A retaining wall may be constructed for slope stability and would be between the estimated height of 6 feet to 8 feet dependent upon the final engineered location of the tank. The overflows for both reservoirs that are currently on-site drain to the sanitary sewer on-site. There will be no additional flow to the sewer line, only the re-routing of one overflow from the pond to the new tank.

9. **Surrounding land uses and setting:** The Project Site is located within the City of Victorville and within the Southern California Logistics Airport Master Plan Area. The Southern California Logistics Airport (SCLA) encompasses approximately 2,200 acres of the former George Air Force Base (GAFB) and occurs in northwest corner of the City of Victorville. The Project Site is located east of Westwind Road and south of Montana Street within an abandoned Base Housing development associated with George Air Force Base. There are currently two water reservoirs for the storage of recycled water located on the Project Site; an elevated storage tank, and an in-ground lined storage pond. Access to the tank will be from the existing road to the east of the tank and from the parking lot to the south of project area. Approximately six acres of Assessor's Parcel Number 0459-211-14 would be impacted by the Project.
10. **Other public agency whose approval is required:** Recordation of a final map, issuance of a building permits and completion of structures to current building code is required by the City prior to establishment of any development on-site. In addition, approval by the Mojave Water Agency, Lahontan Regional Water Quality Control Board, Caltrans, California Department of Fish and Wildlife, Victor Valley Wastewater Reclamation Authority, Mojave Desert Air Quality Management District, Victor Elementary School District, Victor Valley Union High School District, as well as Southern California Edison, Southwest Gas, and Frontier Communications would also be required.

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

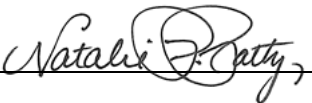
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

**DETERMINATION:**

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and revisions in the project have been made by or agreed to by the project proponent. A NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a significant effect(s) 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, if the effect is a "potentially significant impact" or "potentially significant unless mitigated". An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that the proposed project WILL NOT have a significant effect on the environment, because no new potentially significant effects have been identified beyond those previously analyzed adequately in an earlier EIR, pursuant to applicable standards, and no additional mitigation measures beyond those imposed as part of that previous EIR are necessary to be imposed upon the proposed project to reduce mitigable impacts to a insignificant level. Therefore, no additional environmental documentation is necessary.

Signature:  Date: March 26, 2020  
Natalie P. Patty For: Victor Fajardo

## **EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is provided for all answers except "No Impact" answers that are adequately supported by the information sources the lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer is explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) "Potentially Significant Impact" is noted if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact". The lead agency describes the mitigation measures, and briefly explains how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses", may be cross-referenced).
- 5) Earlier analyses may be referenced where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) The lead agency incorporates into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## ENVIRONMENTAL IMPACTS:

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
I. <b>AESTHETICS.</b> <i>Would the proposal:</i>				
a) Have a substantial adverse effect on a scenic vista? (3; 33)				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (3; 24)				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (1, Table LU-2; 33)				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (1, Table LU-2; 33)			X	

## AESTHETICS

### Explanations:

- No Impact** – The Resource Element of the City of Victorville’s General Plan identifies the importance of conservation of local scenic resources such as natural and cultural resources and how they are necessary assets for the community. However, the General Plan does not identify any scenic vistas in the vicinity of the Project Site which is at the SCLA and is surrounded by development. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- No Impact** – According the Victorville’s 2030 General Plan Environmental Impact report, there are no existing or proposed State scenic highways in the Planning Area. Additionally, the Project Site has been disturbed, and does not contain any significant features such as rock outcroppings, trees, and/or historic buildings that could potentially be damaged by development of the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- No Impact** – The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The in-ground lined storage pond will be filled upon completion of the new tank. The tank will be approximately 34 feet in height and approximately 24 feet will be buried below existing grade (top of tank at elevation 2,883 MSL). The Proposed Project will be within comparable height of current water facilities on site. The Proposed Project is an acceptable use within the Public/Open Space land use category. Additionally, the Proposed Project is outside of the Runway Protection Zone (RPZ). The RPZ is an area of restricted use as it is affected by existing and current airfield operations. Therefore, the Proposed Project would not degrade the visual character or quality of the Site or its surroundings. Therefore, no impacts are identified or anticipated and no mitigation measures are required.



- d. **Less Than Significant Impact** – The Proposed Project is in an area developed with former George Force Air Base housing. Existing light sources include streetlights and exterior security lighting at the Project Site and in the surrounding developments. Lighting associated with the 1 MG reservoir would consist of security lighting only and would be directed internally toward the Project Site. There would be no light or glare that would increase ambient lighting levels or adversely affect day or nighttime views in the area. Therefore, project construction and operation impacts related to substantial light or glare sources would be less than significant, and no mitigation is required.

## II. Agriculture and Forestry Resources.

*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.*

*In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board*

*Would the proposal:*

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (23)
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (1)
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (1)
- d) Result in the loss of forest land or conversion of forest land to non-forest use? (1; 4)
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (1; 4; 23)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X
			X
			X
			X

Explanations:

- a) **No Impact.** The Project Site was previous developed with Base Housing and currently supports an existing reclaimed water pond and associated infrastructure. There are currently no agricultural

operations occurring on-site or within the vicinity of the Project Site. The Department of Conservation's California Important Farmland Finder shows that the Project Site occurs within Urban and Built-Up Land. Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to non-agricultural use and no impact would occur as result of construction and operation of the Proposed Project. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- b) **No Impact.** According to the 2030 General Plan Environmental Impact Report, the nearest farm under a Williamson Act contract is located approximately 5.3 miles southeast from the Project Site. Additionally, the California Department of Conservation: Farmland Land Finder shows that the Project Site occurs within an Urban and Built-Up Land. As discussed above, no land on or near the Project Site is currently under agricultural production, nor are any parcels zoned for agricultural uses. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **No Impact.** The Proposed Project would be located on a site which was previous developed with Base Housing and that currently supports existing reclaimed water facilities. The Project Site is zoned Public/Open Space (P/OS) and the General Plan does not identify parcels zoned for forest land or timber within the vicinity. Therefore, construction and operation of the Proposed Project would not conflict with the existing zoning or cause rezoning of forest land or timberland resources. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- d, e) **No Impact.** The Project Site does not support forest land nor does the Project Site support farmland. Implementation of the Proposed Project would not convert forest land to non-forest use or farmland to non-agricultural use. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

### III. AIR QUALITY. *Would the proposal:*

- a) Conflict with or obstruct implementation of the applicable air quality plan? (1; 2; 3; 10; 26; 33)
- b) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation? (3; 10; 11; 26; 33)
- c) Expose sensitive receptors to substantial pollutant concentrations? (4; 10; 11)
- d) Result in other emissions (such as those leading to odors or dust) adversely affecting a substantial number of people? (4; 10)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	
		X	
			X

### AIR QUALITY

#### Explanations:

- a. **Less Than Significant Impact.** The Project Site is located in the Mojave Desert Air Basin (MDAB). The MDAB encompasses the desert portion of San Bernardino County. The Mojave Desert Air



Quality Management District (MDAQMD) has jurisdiction over air quality issues and regulations within the City of Victorville that includes the project area. To assist local agencies in determining if a project's emissions could pose a significant threat to air quality, the MDAQMD has prepared the CEQA and Federal Conformity Guidelines, August 2016. The air and dust emissions from the construction and operational use of the Proposed Project were evaluated and compared to the MDAQMD air quality thresholds to determine significance.

Air quality is determined primarily by the types and amounts of contaminants emitted into the atmosphere, the size and topography of the local air basin and the pollutant-dispersing properties of local weather patterns. When airborne pollutants are produced in such a volume that they are not dispersed by local meteorological conditions, air quality problems result. Dispersion of pollutants in the MDAB is influenced by periodic temperature inversions, persistent meteorological conditions and the local topography. As pollutants become more concentrated in the atmosphere, photochemical reactions occur, producing ozone and other oxidants.

Air emissions from the Proposed Project are subject to federal, State and local rules and regulations implemented through provisions of the federal Clean Air Act, California Clean Air Act, and the rules and regulations of the California Air Resources Board (CARB) and MDAQMD. Air quality management districts with air basins not in attainment of the air quality standards are required to prepare an Air Quality Management Plan (AQMP). An AQMP establishes an area-specific program to control existing and proposed sources of air emissions so that the air quality standards may be attained by an applicable target date.

The federal Clean Air Act and California Clean Air Act were established in an effort to assure that acceptable levels of air quality are maintained. These levels are based upon health-related exposure limits and are referred to as National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The ambient air quality standards establish maximum allowable concentrations of specific pollutants in the atmosphere and characterize the amount of exposure deemed safe for the public. Areas that meet the standards are designated attainment and if found to be in violation of primary standards are designated as nonattainment areas.

The United States Environmental Protection Agency (EPA) and the CARB have designated portions of the MDAQMD as nonattainment for a variety of pollutants, and some of those designations have an associated classification. Table 1 lists these designations and classifications. The MDAQMD has adopted attainment plans for a variety of nonattainment pollutants.

The Project Site is within the MDAB and under the jurisdiction of the MDAQMD. The MDAQMD is responsible for updating the Air Quality Management Plan (AQMP). The AQMP was developed for the primary purpose of controlling emissions to maintain all federal and state ambient air standards for the district. The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. As such, the Proposed Project is an acceptable use on-site and consists primarily of enhancement of existing facilities. Furthermore, as demonstrated in Section III(b) below, the Proposed Project would not significantly increase local air pollutant emissions and therefore would not conflict with or obstruct implementation of the AQMP. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

**Table 1  
State and Federal Air Quality  
Designations and Classifications**

<b>Ambient Air Quality Standard</b>	<b>Status</b>
Eight-hour Ozone (Federal 70 ppb (2015))	Expected Non-attainment; to be determined.
Ozone (State)	Non-attainment; classified Moderate
PM <sub>10</sub> (24-hour Federal)	Non-attainment; classified Moderate (portion of MDAQMD in Riverside County is unclassifiable/attainment)
PM <sub>2.5</sub> (Annual Federal)	Unclassified/attainment
PM <sub>2.5</sub> (24-hour Federal)	Unclassified/attainment
PM <sub>2.5</sub> (State)	Non-attainment (portion of MDAQMD outside of Western Mojave Desert Ozone Non-Attainment Area is unclassified/attainment)
PM <sub>10</sub> (State)	Non-attainment
Carbon Monoxide (State and Federal)	Unclassifiable/Attainment
Nitrogen Dioxide (State and Federal)	Unclassifiable/Attainment
Sulfur Dioxide (State and Federal)	Attainment/unclassified
Lead (State and Federal)	Unclassifiable/Attainment
Particulate Sulfate (State)	Attainment
Hydrogen Sulfide (State)	Unclassified (Searles Valley Planning Area is non-attainment)
Visibility Reducing Particles (State)	Unclassified

Source: MDAQMD CEQA and Federal Conformity Guidelines, August 2016

- b) **Less Than Significant Impact.** The MDAQMD has established the following significant daily emissions thresholds for determining whether the impacts from a proposed project would be considered significant per CEQA:

Carbon Monoxide (CO)	548 lbs/day
Oxides of Nitrogen (NO <sub>x</sub> )	137 lbs/day
Reactive Organic Gasses (ROG)	137 lbs/day
Oxides of Sulfur (SO <sub>x</sub> )	137 lbs/day
Particulate Matter (PM <sub>10</sub> )	82 lbs/day
Particulate Matter (PM <sub>2.5</sub> )	65 lbs/day

Construction emissions are considered short-term, temporary emissions and were modeled with the assumption that one crane, welder, grader, dozer, and three pieces of miscellaneous construction equipment would be required. The construction equipment was assumed to be operated for eight hours per working day. Upon completion of the construction phase, it was conservatively assumed that the Proposed Project's operational phase would consist of routine maintenance which will consist of the once weekly use of one maintenance truck for eight hours per day. Both the construction and operational emissions were estimated utilizing South Coast AQMD Off-Road Source Emission Factors for the 2019 operational year. The resulting emissions generated by construction of the Proposed Project are shown in Table 2 and Table 3.



**Table 2**  
**Construction Emissions Summary**  
**(Pounds per Day)**

<b>Equipment</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Crane	0.76	5.79	3.19	0.23	0.21
Welder	0.28	1.47	1.47	0.09	0.09
Grader	0.79	5.19	4.63	0.25	0.23
Dozer	1.78	13.56	6.71	0.55	0.50
Miscellaneous Equipment <sup>1</sup>	1.43	9.53	8.45	0.38	0.35
<b>Highest Value (lbs/day)</b>	<b>5.04</b>	<b>35.55</b>	<b>24.45</b>	<b>1.50</b>	<b>1.38</b>
MDAQMD Threshold	137	137	548	82	65
<b>Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Emission Sources: Off-Road Mobile Source Emission Factors (2019)

**Table 3**  
**Operational Emissions Summary**  
**(Pounds Per Day)**

<b>Equipment</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Maintenance Truck	0.18	1.25	1.20	0.05	0.05
<b>Total (lbs/day)</b>	<b>0.18</b>	<b>1.25</b>	<b>1.20</b>	<b>0.05</b>	<b>0.05</b>
MDAQMD Threshold	137	137	548	82	65
<b>Significant</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Emission Sources: On-Road Mobile Source Emission Factors Delivery Trucks (>8500 pounds) (2020)

As shown above, the anticipated operational emissions are less than the MDAQMD thresholds and would be considered less than significant. Furthermore, the Proposed Project shall comply with MDAQMD Rules 402 and 403, as listed below.

*Compliance with MDAQMD Rules 402 and 403*

Although the Proposed Project does not exceed MDAQMD thresholds, the Applicant is required to comply with applicable MDAQMD Rules 402 for nuisance and 403 for fugitive dust control. This would include, but not be limited to the following:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
2. The Project Proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being used shall be watered to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
3. The Project Proponent shall ensure that disturbed areas are treated to prevent erosion.
4. The Project Proponent shall ensure that ground disturbing activities are suspended when winds exceed 25 miles per hour.

Although the Proposed Project would not exceed MDAQMD thresholds for exhaust emissions during operations, the Applicant would be required to implement the following conditions as required by MDAQMD:

5. All equipment must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
6. The operator shall comply with all existing and future CARB and MDAQMD Off-Road Diesel Vehicle Regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

MDAQMD rules for diesel emissions from equipment and trucks are embedded in the compliance for all diesel fueled engines, trucks, and equipment with the statewide CARB Off-Road Diesel Vehicle regulations. These measures will be implemented by CARB in phases with new rules imposed on existing and new diesel-fueled engines.

The Project Site is within the Mojave Desert PM<sub>10</sub> Planning Area and the Western Desert Ozone non-attainment area. The State Implementation Plan (SIP) identifies sources of PM<sub>10</sub> emissions and control measures to reduce emissions. The EPA requires the application of reasonable available control technology (RACT) to stationary emission sources and reasonable available control measures (RACM) to mobile sources. These will be incorporated through compliance with rules and regulations described above. As such, with compliance with existing rules and regulations, the Proposed Project would not violate any air quality standards or contribute to an existing or projected air quality violation. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less Than Significant Impact.** The MDAQMD CEQA and Federal Conformity Guidelines (August 2016) describes sensitive receptors as being residences, schools, daycare centers, playgrounds and medical facilities. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated using MDAQMD significance thresholds:

- Any industrial project within 1000 feet;
- A distribution center (40 or more trucks per day) within 1000 feet;
- A major transportation project (50,000) or more vehicles per day) within 1000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

As such, the Proposed Project does not meet the criteria for a project type which is subject to sensitive receptor significance threshold evaluation. Furthermore, the modeling results (as shown in Table 2) indicate that development of the Proposed Project is not anticipated to exceed MDAQMD emissions thresholds. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- d) **No Impact.** The Proposed Project would not contain a land use typically associated with the emissions of objectionable odors. Potential odor sources associated with the Proposed Project may result from construction equipment exhaust; however, standard construction requirements would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. The Proposed Project would also be required to comply with SCAMD Rule 402 to prevent occurrences of public nuisances.



Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

**IV. BIOLOGICAL RESOURCES.** *Would the proposal result in impacts to:*

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (3; Table RE-2; 10; 34)		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (1; 3; 4; 10; 34)				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (1; 4)				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (3; 10; 13)				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (14)				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan? (3)				X

Explanations:

- a) **Less Than Significant Impact with Mitigation Incorporated.** A Desert Tortoise Survey was performed by ECORP Consulting, Inc. on November 27, 2018. According to the survey, the Project Site consists of approximately 10 acres of disturbed habitat, with dominant species being rabbitbrush (*Ericameria nauseosa*), fourwing saltbush (*Atriplex Canescens*), Russian thistle (*Salsola tragus*), and telegraph weed (*Heterotheca grandiflora*). The Project Site also contained chokecherry (*Prunus virginiana*) throughout and tamarisk (*Tamarisk aphylla*) and Desert Willow (*Chilopsis linearis*) occur along adjacent properties. The Project Site contained compacted soils and remnant piles of disturbed soil. The SCLA Specific Plan states that the wildlife population within the former Base is described as having "low stable population levels." Both the diversity and abundance of wildlife are limited by lack of adequate food, sparse ground cover which limits nesting sites, and an unreliable source of water.

During the desert tortoise surveys, no desert tortoise, desert tortoise burrows, or sign of desert tortoise (e.g., scat, tracks, etc.) were identified on the Project Site, or within the 300-foot buffer. Although the Project Site is located within the desert tortoise range, the poor-quality habitat on-site

likely precludes this species from occurring on-site. However, to ensure potential impacts to this species are reduced to a less than significant level, the following mitigation measure shall be implemented:

***Mitigation Measure BIO-1:***

**A preconstruction survey be conducted no more than 14 days prior to construction to ensure that no desert tortoises are on the Project Site prior to construction.**

- b) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. Upon completion of the new tank, the pond would be backfilled and abandoned. The SCLA Specific Plan states that the most important habitat for wildlife occurs to the east of the riparian plant community of the Mojave River, which is approximately one-mile away. The Project Site is not located within any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **Less Than Significant.** The SCLA Specific Plan states that the wildlife population within the former Base is described as having “low stable population levels.” Both the diversity and abundance of wildlife are limited by lack of adequate food, sparse ground cover which limits nesting sites, and an unreliable source of water. Therefore, the Project Site is not anticipated to include any State or federally protected wetlands as protected under CEQA, Section 1600 of the California Fish and Wildlife Code, or as defined by Section 404 of the Clean Water Act. Therefore, less than significant impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** The Resource Element of the City’s General Plan identifies a wildlife corridor of special concern located within the area of the Mojave River. Since the Mojave River is located approximately one-mile west of the Project Site, the Proposed Project is not anticipated to 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 since the site does not include disturbances to any sensitive areas. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- e) **No Impact.** The proposed use on-site would continue as public facilities for recycled water and is consistent with the existing land use designation of Public/Open Space (P/OS). There are no existing trees or other biological resources on site that would be impacted by the Proposed Project. Therefore, no impacts related to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance are identified. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- f) **No Impact.** The Victorville General Plan does not identify the Project Site, nor the vicinity to be within a habitat conservation plan. The Proposed Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan since there is no adopted Habitat Conservation Plan or Natural Community Conservation Plan in the project area or local region. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

**V. CULTURAL RESOURCES.** *Would the proposal:*

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? (3; 35; 36)
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? (3; 35; 36)
- c) Disturb any human remains, including those interred outside of formal cemeteries? (3; 4; 35; 36)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
	X		
	X		
	X		

**CULTURAL RESOURCES**

Explanations:

- a,b) **Less Than Significant Impact w/Mitigation Incorporated.** In October 2019, McKenna et al. (McKenna) prepared a Phase I Cultural Resources Investigation for the Proposed Project. An archaeological records check was completed at the California State University, Fullerton, South Central Coastal Information Center (CSUF-SCCIC) and identified a minimum of 52 cultural resources investigations within a one-mile radius of the Project Site. Research also identified 36 cultural resources within one mile of the Area of Potential Effects (APE) including one site reported to be within the George Airforce Base site, itself. In all, the records search identified 23 prehistoric resources, 12 historic resources, and one resource with both prehistoric and historic components. Two (2) of the resources noted were also identified as California Historical Landmarks: The Old Spanish Trail and the Mormon Trail. However, neither of these resources is within the current Project Site.

McKenna found the project area is sensitive for prehistoric archaeological resources. Additionally, the project area is moderately sensitive for historic archaeological resources. Therefore, potentially significant impacts could occur during site excavation, and the following mitigation measures are recommended to reduce impacts to a level of less than significant:

***Mitigation Measure CR-1:***

**Project-related earthmoving activities within the project APE shall be monitored by an archaeological monitor with both prehistoric and historic archaeological qualifications. This monitoring program need not be conducted on a full-time basis and should be conducted while earthmoving involves impacts to the younger alluvium deposits. The extent would be based on the extent of younger alluvium and project development scheduling.**

***Mitigation Measure CR-2:***

**In the event any evidence of prehistoric archaeological resources are identified, a Native American representative, preferably of Serrano descent, shall be added to the archaeological monitoring program until it is determined the monitoring is no longer required.**

- c) **Less than Significant Impact.** McKenna states that there is no evidence that human remains will be identified within the project area, but the presence cannot be completely ruled out. Construction activities, particularly grading, could potentially disturb human remains interred



outside of a formal cemetery. Thus, the potential exists that human remains may be unearthed during grading and excavation activities associated with project construction. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level of less than significant:

***Mitigation Measure CR-3:***

**If, at any time, evidence of human remains (or potential human remain) is uncovered, the County Coroner must be notified immediately and permitted to examine the find(s). If the remains are determined to be of Native American origin, the Coroner will contact the Native American Heritage Commission and the Commission with name the Most Likely Descendant (MLD). In consultation between the City of Victorville, the MLD, and the consulting archaeologist, the disposition of the remains will be determined. If Native American human remains are identified within the project area, a Native American observer should be added to the overall monitoring program for the duration of the activities associated with excavation in soils likely to yield additional remains.**

**VI. ENERGY.** *Would the project:*

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (3, 8, 16, 33)
- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (3, 8,16, 33)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	

**ENERGY**

Explanations:

**Senate Bill 350**

Senate Bill (SB) 350 (de Leon) was signed into law in October 2015. SB 350 establishes new clean energy, clean air and greenhouse gas reduction goals for 2030. SB 350 also establishes tiered increases to the Renewable Portfolio Standard: 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030.

**Senate Bill 100**

Senate Bill 100 (SB 100) was signed into law September 2018 and increased the required Renewable Portfolio Standards. SB 100 requires the total kilowatt-hours of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

a,b) **Less than Significant Impact.**

**Electricity**

Southern California Edison (SCE) currently provides electrical service to the Proposed Project Site which is developed with existing a reclaimed water pond and related water facilities. SCE is one of the nation's largest electric utilities, providing electric service to approximately 15 million people. Their service area includes portions of 15 counties and hundreds of cities and communities in a 50,000-square-mile service area within Central, Coastal and Southern California. Total electricity demand in SCE's service area is estimated to increase by approximately 12,000 Gigawatt hours between the years 2015 and 2026. The demand for electricity is expected to be sufficiently served by the existing SCE electrical facilities because the project's electricity demand would remain the same, as the original water pumps will be used for the new reclaimed water tank. Therefore, projected electrical demand would not significantly impact SCE's level of service. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

**Natural Gas**

The Proposed Project would not use natural gas and therefore would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no mitigation measures are recommended.

**Fuel**

During construction of the Proposed Project, transportation energy consumption is dependent on the type of vehicle and number of vehicle trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. However, Temporary transportation fuel use such as gasoline and diesel during construction would come from the transportation and use of delivery vehicles and trucks, construction equipment, and construction employee vehicles. Additionally, most construction equipment during grading would be powered by gas or diesel. Electric powered equipment shall be implemented as development furthers. The Proposed Project is estimated to used 13,678.90 gallons of fuel per day. Impacts related to transportation energy use during construction would be temporary and would not require the use of additional use of energy supplies or the construction of new infrastructure; therefore, impacts would be less than significant.

During operations of the Proposed Project, the use of fuel would be generated by maintenance staff and employee vehicle trips. Employees currently visit the site for maintenance and repair of the existing facilities. The fuel use related with vehicle trips produced by the new water tank would not increase over existing use and therefore would not be considered inefficient, wasteful, or unnecessary. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

Project design and operation would comply with the Victorville's Climate Action Plan, and the State Building Energy Efficiency Standards related to appliance efficiency regulations, and green building standards. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

The Proposed Project is designed to adhere to Victorville's Climate Action Plan and Resource Element: Energy Conservation of the City General Plan to support decrease energy consumption

and GHG emissions to become a more sustainable community and to meet the goals of AB 32. The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, AB 32, and SB 32; therefore, the Project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by to 2020. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

**VII. GEOLOGY AND SOILS.** *Would the project:*

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				X
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.) (7, Figure S-1)				X
ii) Strong seismic ground shaking? (7, Table S-1)				X
iii) Seismic-related ground failure, including liquefaction? (7)				X
iv) Landslides? (5, pg. 27; 7, Figure S-3)				X
b) Result in substantial soil erosion or the loss of topsoil? (5, pg. 27; 7; 27)			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (5, pg. 27; 7)				X
d) Be located on expansive soil, as defined on Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (5, pg. 27; 8)			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? (19)				X
f) Directly or indirectly destroy a unique paleontological resources or site unique geological feature? (3)		X		

Explanations:

- a. **No Impact.** The Proposed Project is not anticipated to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death as the Project Site use will remain the same and is a permitted use in accordance with the existing land use designation.
- i. **No Impact** – The Project Site is located in seismically active southern California with numerous fault systems in the region. However, the Project Site is not located within an Alquist-Priolo Special Studies area. The General Plan states that there are no known or



suspected fault traces located within the Victorville Planning Area. According to the Southern California Earthquake Data Center, the nearest faults are the Mirage Valley Fault and Helendale Fault. The Mirage Valley Fault is located approximately 10.40 miles northwest of the Project Site and Helendale Fault is approximately 10 miles northeast of the Project Site. No impacts are identified or anticipated, and no mitigation measures are required.

- ii. **No Impact** – According to the SCLA Specific Plan, the Project Site is located in the highly seismic southern California region within the influence of several fault systems that are considered to be active or potentially active. However, with compliance with the Victorville Municipal Building Development Codes and the latest adopted version of the California Building Code, the Proposed Project would be adequately reinforced for potential earthquakes. No impacts are identified or anticipated, and no mitigation measures are required.
  - iii. **No Impact** – According to the City's General Plan, the Project Site is not located within an area susceptible to liquefaction as the potential for liquefaction hazards are limited to the Mojave River floodplain and its tributary stream crossings where groundwater is shallow and loose sandy soils occur. The Mojave River is located approximately one-mile east of the Project Site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
  - iv. **Less Than Significant** – The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The Project Site would continue to be used for reclaimed water storage and related infrastructure which is a permitted use with the existing land use designation of Public/Open Space. The Safety Element of the General Plan identifies natural hazards, which include seismically induced surface rupture, ground shaking, ground failure, and liquefaction, along with slope instability leading to mudslides and landslides, subsidence, flooding, and wildland fires. According to Figure S-3: Slope Hazards, Project Site is outside the area of concern for slope hazards. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- b. **Less Than Significant.** According to the United States Department of Agriculture Web Soil Survey (accessed 10/14/2019), soils on-site consist of Bryman Loamy Sand (.04 percent), Mohave Variant Loamy Sand (45.9 percent), and Cajon Sand (53.7 percent) soils with a slope averaging 0 to 9 percent. Cajon Sand retains a slight hazard of water erosion and a high hazard of soil blowing. The Proposed Project will adhere to the City of Victorville's Municipal Code:10.30.210, Erosion and Sediment Control Plan ("ESCP") and the National Pollution Discharge Elimination System, which ensures potential impacts with regards to substantial soil erosion or the loss of topsoil to be less than significant.
- c. **No Impact.** The Project Site is relatively flat. The potential of unstable soil condition, landslide, lateral spreading, subsidence, liquefaction or collapse is present because of the geographical make-up of the area and the frequency of earthquake occurrences in Southern California. According to General Plan Figure S-3, the Project Site is not located within a slope hazards area. Any project within the area of Southern California shall meet the latest UBC standards to minimize the potential impact caused by an earthquake. Therefore, the potential for instability occurring at this Project Site is less than significant with proper construction methods and development standards as defined in the City's Municipal Code and the latest UBC regulations. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- d. **Less Than Significant Impact.** Expansive (or shrink-swell) behavior is attributable to the water-holding capacity of clay minerals and can adversely affect the structural integrity of facilities including underground pipelines. The General Plan does not identify soil conditions in the area

that would lead to expansive behavior nor has there been any reported cases in the surrounding area. According to the United States Department of Agriculture: Web Soil Survey, the soil at the Project Site mostly consists of Cajon Sandy soil with a slope averaging 0 to 9 percent. Cajon Sandy soil is listed as Hydrologic Soil Group A. The United States Department of Agriculture: Hydrology National Engineering Handbook defines Hydrologic Soil Group A as having low runoff potential when thoroughly wet. Water is transmitted freely through the soil. Group A soils typically have less than 10 percent clay and more than 90 percent sand or gravel and have gravel or sand textures. Some soils having loamy sand, sandy loam, loam or silt loam textures may be placed in this group if they are well aggregated, of low bulk density, or contain greater than 35 percent rock fragments. The USDA states that the extent of shrinking and swelling is influenced by the amount and kind of clay in the soil. Since, Group A soils typically have less than 10 percent clay, the potential for expansion is considered less than significant.

- e. **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps, and will not include a septic tank, nor connection to the public sewer system. Therefore, no impacts related to incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater are identified. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
- f. **Less Than Significant Impact with Mitigation Incorporated.** The Cultural Resources Investigation prepared for the Proposed Project states that a paleontological overview completed by McLeod identified the project area as consisting of some artificial fill above sedimentary deposits of older terrestrial Quaternary Alluvium derived from the Mojave River. These older deposits are generally referred to as Shoemaker gravel. Fossil specimens have been known to be associated with these deposits and the nearest specimens have been recovered from the western extents of George Air Force Base from depths exceeding ten feet below the present surface. Additional specimens have been recovered from the western banks of the Mojave River. McLeod concluded shallow excavations are unlikely to yield evidence of fossil specimens, but deeper excavations (greater than 10 feet) that impact the older alluvium may yield such specimens. Monitoring of these excavations is recommended and sampling of the back dirt may yield additional evidence of small fragments or specimens. Therefore, to ensure potential impacts to paleontological resources are reduced to a less than significant level, the following mitigation measure shall be implemented:

***Mitigation Measure GEO-1:***

**Project-related earthmoving activities that exceed the depth of younger Quaternary alluvium and impact older Quaternary alluvium must be subjected to a paleontological monitoring program designed to meet the standards, policies, and guidelines of the San Bernardino County Museum Department of Earth Sciences if excavations are to impact older Quaternary alluvium. The program requirements would be based on the depth of older alluvium and final project design.**

**VIII. Greenhouse Gas Emissions. Would the proposal:**

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment? (3; 10)
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (3; 10)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	

**Explanations:**

- a-b) **Less Than Significant Impact.** According to CEQA Guidelines section 15064.4, when making a determination of the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use.” Moreover, CEQA Guidelines section 15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

The City of Victorville adopted a Climate Action Plan (CAP) in May 2016. The CAP presents the greenhouse gas (GHG) inventories, identifies the effectiveness of California initiatives to reduce the GHG emissions, and identifies local measures that were selected by the City to reduce GHG emissions under the City’s jurisdictional control to achieve the City’s identified GHG reduction target. Additionally, the City participated in the San Bernardino County Regional GHG Reduction Plan (March 2014) (GHG Plan) and used the technical information within the County’s GHG Plan in the development of the CAP.

As stated by the County’s GHG Plan, the City of Victorville selected to reduce its community GHG emissions to a level that is 29% below its projected GHG emissions level in 2020. The City implements CEQA by requiring new development projects to quantify project GHG emissions and adopt feasible mitigation to reduce project emissions below a level of significance standard as stated in the County’s GHG Plan of 3,000 metric tons of CO<sub>2</sub> equivalent (MTCO<sub>2</sub>e) per year.

**Construction and Operational Emissions**

As stated, a threshold of 3,000 MTCO<sub>2</sub>e per year has been adopted by the County as potentially significant to global warming. Utilizing the SCAQMD’s Off-Road Mobile Source Emission Factors (2019), construction and annual operation GHG emissions were estimated and are shown in Tables 4 and 5, respectively.

As shown in Tables 4 and 5, GHG emissions associated with construction and operation of the Proposed Project are not anticipated to exceed the County’s GHG emissions threshold. Therefore, the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment. Additionally, the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.



**Table 4**  
**Construction GHG Emissions Summary**  
**(Tons per Year)**

Equipment	CO <sub>2</sub>	CH <sub>4</sub> *
Crane (lbs/day)	1,032	0.07
Welder (lbs/day)	205	0.02
Grader (lbs/day)	1,064	0.07
Dozer (lbs/day)	1,912	0.16
Miscellaneous Equipment <sup>1</sup> (lbs/day)	2,952	0.13
Total Per Year (lbs/day)	7,165	0.46
<b>Total MTCO<sub>2</sub>e</b>	<b>423.25</b>	
County Threshold (MTCO <sub>2</sub> e)	3,000	
<b>Significant</b>	<b>No</b>	

Source: Off-Road Mobile Source Emission Factors (2019)

Note: Assumes five eight-hour working days/week for a six-month construction schedule.

\*CH<sub>4</sub> has a Global Warming Potential of 28 as provided by IPCC's 2013 Working Group I

<sup>1</sup>Assumes three pieces of miscellaneous construction equipment.

**Table 5**  
**Operational GHG Emissions Summary**  
**(Tons per Year)**

Equipment	CO <sub>2</sub>	CH <sub>4</sub> *
Maintenance Truck (lbs/day)	427.72	0.01
Total Per Year (lbs/day)	427.72	0.22
<b>Total MTCO<sub>2</sub>e</b>	<b>10.09</b>	
County Threshold (MTCO <sub>2</sub> e)	3,000	
<b>Significant</b>	<b>No</b>	

Source: On-Road Mobile Source Emission Factors Delivery Trucks (>8500 pounds) (2020)

Note: Assumes one eight-hour working day per week.

\*CH<sub>4</sub> has a Global Warming Potential of 28 as provided by IPCC's 2013 Working Group I

**IX. HAZARDS AND HAZARDOUS MATERIALS. Would the proposal:**

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (1; 10)
- 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? (1; 10)
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (1; 10)
- Be located on a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (7; 10)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
	X		
			X
			X

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 of excessive noise for people residing or working in the project area. (1; 4; 10)			X	
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (7, Fig. S-5)				X
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (1; 4; 7)				X

Explanations:

- a) **No Impact.** Construction activities associated with the Proposed Project would involve use of limited quantities of hazardous materials such as petroleum, hydrocarbons, and their derivatives (e.g., gasoline, diesel, oils, and lubricants) to operate the construction equipment. Construction activities would be short-term and would involve the limited transport, storage, use, and disposal of hazardous materials. These materials would be used with construction equipment and stored in vessels engineered for safe storage.

Similar to construction, operation of the Proposed Project could involve limited quantities of hazardous materials such as petroleum, hydrocarbons, and their derivatives (e.g., gasoline, diesel, oils, and lubricants) during periodic maintenance activities. The use or disposal of these hazardous substances would occur according to instructions provided by the product manufacturer and be subject to federal, state, and local health and safety regulations involving storage, transport, use, and disposal. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant impacts and no mitigation is required.

- b) **Less Than Significant Impact with Mitigation Incorporated.** As described under item VIII a) above, construction and operational activities associated with the Proposed Project would involve relatively small quantities of hazardous substances associated with the operation of equipment and vehicles. Construction vehicles on site may require refueling or maintenance that could result in minor releases of oil, diesel fuel, transmission fluid, or other materials. Inadvertent releases of hazardous materials on construction sites are typically localized and would be cleaned up in a timely manner in compliance with state and local laws that govern proper containment, spill control, and disposal of hazardous waste generated during construction.

Mandatory compliance with all federal, state, and local regulations on the transport, use, and disposal of hazardous materials would further reduce the likelihood of an accidental release of hazardous materials into the environment. Construction and operation of the Proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.

GEOTEK, Inc. performed a Limited Phase II Environmental Site Assessment (ESA) in June 2019, at the location of the Project Site. As noted in the letter report, services were conducted in substantial conformance with the scope and limitations of the American Society of Testing and

Materials (ASTM) E1903-11, "*Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.*"

The Project Site is situated within the Southern California Logistics Airport (SCLA) industrial park (former. George Air Force Base). The George Air Force Base was opened in June 1941 and officially closed of all military activities in December 1992. The Site is vacant of structures and surface vegetation consists of sporadic light brush. GEOTEK'S scope of work for the project consisted of the following:

- Excavation of 4 exploratory borings on-site utilizing a GeoProbe® direct push rig (truck mounted),
- Collection of soil samples of the on-site materials,
- Laboratory testing of selected soil samples collected from the site, and
- Compilation of a letter report that presents findings, conclusions and recommendations.

The borings were extended to a depth of approximately three feet below the existing ground surface. Soil samples were collected from depths of 0 to 6" and at 3 feet below the existing ground surface from each of the borings. The number of borings, depths of the borings and depths of the samples were dictated to us by the United States Air Force.

Analysis of the soil samples did not detect measurable quantities of OCP constituents in Samples ENV-1 at 3'; ENV-2 at 0'; ENV-2 at 3'; and ENV-3 at 3'. Analysis of the soil samples did detect measurable quantities of the OCP constituents aldrin, chlordane and dieldrin in Samples ENV-1 at 0'; ENV-3 at 0'; ENV-4 at 0'; and ENV-4 at 3'.

The OCP constituent dieldrin is in concentrations above the regional screening level for industrial soils, as determined by EPA Regional Screening Levels (RSLs) for industrial soil, April 2019 for Samples ENV-1 at 0' and ENV-4 at 0'.

As concluded in the letter report, due to the presence of pesticides (i.e. dieldrin) detected in the soil samples, and the existing known environmental concerns at the SCLA industrial park, the following mitigation measure shall be implemented:

***Mitigation Measure HAZ-1:***

**Appropriate safety measures shall be taken during soil excavation due to the presence of pesticides. Prior to field work the City shall consult with a Geotechnical Engineer to determine the need for sampling and laboratory testing prior to excavations at the Project Site.**

- c) **No Impact.** No schools occur within 0.25-mile of the Project Site. However, there are several schools within approximately 0.5-mile of the Project Site including: Excelsior Charter School, George Air Force Base Elementary, Harold H George Magnet School, Adelanto Charter Academy, and Harry Sheppard Middle School. As described under items VIII a) and b) above, construction and operation of the Proposed Project would involve the transport and use of small quantities of hazardous materials. Such materials would be transported, stored, and disposed of in accordance with applicable codes and regulations and would not create a significant hazard to the public or the environment. The Proposed Project would not have an adverse effect on any existing or proposed schools through hazardous emissions or handling. Therefore, no impacts are identified or anticipated and no mitigation measures are required.



- d) **No Impact.** According to the California Department of Toxic Substances Control EnviroStor (accessed 10/31/2019), the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.
- e) **Less Than Significant.** The Project Site is located approximately one-mile southeast from the SCLA. As shown in the General Plan: SCLA Existing Airport Noise Contours Map, the Project Site is located outside of the airport noise contours. Construction of the Proposed Project would cause a short-term increase in noise levels. During operation, the Proposed Project would not require the use of mechanical equipment or generators which would not result in excessive noise levels. The Proposed Project is not anticipated to exceed the standard noise levels which allows for up to 70 decibels (dB) is considered "Normally Acceptable" for utilities as identified in the Noise Element of the General Plan. The Proposed Project is not anticipated to result in a safety hazard of excessive noise for people residing or working in the project area. Therefore, less than significant impacts identified or are anticipated, and no mitigation measures are required.
- f) **No Impact.** According to the City's General Plan and the SCLA Area Plan, the Project Site does not occur in an area designated for an emergency response plan or emergency evacuation plan. Additionally, the Project Site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction of the reservoir, the contractor would be required to maintain adequate emergency access for emergency vehicles. Operation of the reservoir, which would include inspections, maintenance, would not result in excessive vehicle trips to the Project Site. The Project Site would be maintained to allow for appropriate off-road parking. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- g) **No Impact:** As discussed in the City's General Plan Safety Element, the National Fire Protection Association defines a wildland fire as "any forest, grass, brush or tundra fire involving lands not under cultivation." An urban fire is a fire that occurs in developed areas which may include structures and vehicles. The Project Site occurs in an urban area; no forest land or significant areas of bio mass occur near the Project Site that would fuel a wildfire. The City of Victorville has adopted a Fire Hazard Abatement Ordinance (Chapter 8.09, Victorville Municipal Code) which requires the abatement of weeds in excess of three inches above the grade in the area of growth on such portion of the lot or premises within one hundred feet of any structure. Russian Thistle (tumbleweeds) are not permitted to grow in excess of three inches within City limits on any property, regardless of surrounding improvements. Adherence to this ordinance reduces the likelihood of fires on undeveloped lands and on vacant lots in the developed portions of the Planning Area. During a recent site visit conducted in October 2019, the Project Site is mostly lack of any vegetation and visibility of the soils was a prominent feature. Therefore, the Proposed Project is not anticipated to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

		Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X.</b>	<b>HYDROLOGY AND WATER QUALITY. <i>Would the proposal:</i></b>				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (3; 10; 17; 20)				X
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (1; 3; 10; 21; 27)				X
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (10; 17; 20)			X	
	i) result in substantial erosion or siltation on- or off-site (10);			X	
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite (10);			X	
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (10); or;			X	
	iv) impede or redirect flood flows? (7, Figure S-2; 9, Panel 6480).			X	
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (7, Table S-1)			X	
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Explanations:

- a) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The stored reclaimed water from operation of the Proposed Project shall adhere to Title 22 of California's Water Recycling Criteria. Title 22 includes specific uses allowed with disinfected tertiary recycled water (such as irrigating parks), uses allowed with disinfected secondary recycled water (such as irrigating animal feed and other unprocessed crops), and uses allowed with undisinfected secondary recycled water (such industrial uses). Therefore, the Proposed Project will not violate any water quality standards, wastewater discharge requirements or degrade surface and/or groundwater quality. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

- b) **No Impact.** The new reservoir will store reclaimed water is used for irrigation and industrial cooling by tenants of the SCLA. As an alternative to potable water the use of reclaimed water reduces demands on groundwater supplies. There are no groundwater recharge facilities near the Project Site. Therefore, the Proposed Project shall not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; no impacts are identified or are anticipated, and no mitigation measures are required.
- c) **Less Than Significant Impact.** The Proposed Project will not substantially alter the existing drainage pattern of the site or area as there are no existing streams or rivers that traverse the area. The Proposed Project includes replacing an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and re-locating the underground piping and the pumps. During construction, all projects are required to comply with National Pollutant Discharge Elimination System (NPDES) requirements; for this project:
- For control of construction and post-construction related storm water the City shall meet the requirements of the Small MS4 General Permit. In addition, the City shall:
  - Prepare a project specific Storm Water Pollution Prevention Plan (SWPPP) as required in the NPDES permit and shall identify site-specific erosion and sediment control best management practices that will be implemented;
  - The SWPPP shall be applicable to all areas of the project site including construction areas, access roads to and through the site, and staging and stockpile areas; and
  - Temporary best management practices for all components of the project must be implemented until such time as permanent post-construction best management practices are in place and functioning.
- i-iv **Less Than Significant Impact.** The Proposed Project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, since the Project Site is currently permitted for use as a water facilities site. The Proposed Project will not increase runoff water more than what is currently permitted and would not impede or redirect current flows.
- d) **No Impact.** According the Figure S-2: Flood Hazards Map of the of the General Plan, the Proposed Project is within Zone X. Areas within Zone X are subject to flooding in the event of a 500-year flood, areas subject to a 100-year flood with average floodwater depths anticipated to be less than one foot or with drainage areas less than one square mile, and areas protected by levees from the 100- year flood. Therefore, the Proposed Project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving flooding as no flood hazards traverse the project area, nor is the Project Site subject to inundation by seiche or mudflow hazards. Due to the Proposed Project location in the High Desert, there are no impacts related to tsunamis. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.
- e) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The Proposed Project shall adhere to Title 22 of California's Water Recycling Criteria. The Proposed will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, no impacts are identified or are anticipated, and no mitigation measures are required.

**XI. LAND USE AND PLANNING.** *Would the proposal:*

- a) Physically divide an established community? (4)
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (1, Table LU-2; 1, Figure LU-1; 2; 33)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X

Explanations:

- a) **No Impact.** The Project Site is located on city-owned land that is currently developed with existing reclaimed water storage facilities. Surrounding land uses include former George Air Force Base housing. Proposed construction would be contained to within an estimated a 1,000 square-foot portion of the Project Site. The Proposed Project would not divide an established community. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** The Project Site is within the SCLA Specific Plan area and is designated Public/Open Space. Existing development on-site includes an in-ground lined pond used for reclaimed waters storage. The Proposed Project would not change the existing land use. Additionally, construction of the Proposed Project would consist of short-term and operational activities consistent with existing uses on-site. There would be no anticipated impacts to adjacent developments. No new uses would be established at the Project Site. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

**XII. MINERAL RESOURCES.** *Would the proposal:*

- a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state? (3, Fig. RE-1)
- b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? (3, Fig. RE-1)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	

**MINERAL RESOURCES**

Explanations:

- a,b) **Less than Significant** – According to City of Victorville General Plan Figure RE-1, the Project Site occurs in the MRZ-3a Zone. MRZ-3a areas are defined as containing known mineral occurrences of undetermined mineral resource significance. Further exploration work within these areas could result in the reclassification of specific localities into MRZ-2A or MRZ-2b categories. However, the Project Site and vicinity are not designated for mining. Once the replacement reservoir is constructed, fill material would be brought in to reclaim the existing pond. Therefore, the Proposed Project would not result in a significant loss of availability of a known or locally important mineral resource or the loss mineral resources that would be of value to the region and the residents of the

state. Therefore, less than impacts are identified or anticipated and no mitigation measures are required.

**XIII. NOISE.** *Would the proposal result in:*

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (1; 10; 15, Tables N-2 & N-3; 28)			X	
b) Generation of excessive groundborne vibration or groundborne noise levels? (10)			X	
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? (1, 4, 10)			X	

**Explanations:**

- a,b) **Less Than Significant Impact** –The Noise Element of Victorville General Plan identifies hospitals, convalescent homes, schools, churches and sensitive wildlife habitats as being sensitive to noise. However, there no hospitals, convalescent homes, schools, churches or sensitive wildlife habitats adjacent to or within the Project Site. According to Table N-3: Victorville Land Use Compatibility Standard of the City of the Victorville General Plan, noise levels of up to 70 decibels (dB) is considered “Normally Acceptable” for industrial, manufacturing, and utilities. Temporary or periodic increase in ambient noise levels in the project vicinity will increase when events such as construction activities occur. While these events will increase ambient noise levels in the short term, they are typical short term increases that would be assumed under existing development standards. Additionally, the Victorville Municipal Code anticipates such occurrences and accordingly regulates such activities through base ambient noise level time frames that will mitigate potential adverse impacts. According to the Chapter 13: Noise Control of Victorville’s Municipal Code, construction activities would be limited to the hours between 7:00 AM and 10:00 PM for residential zones with noise levels up to 65 dB, anytime for all commercial noise levels up to 70 dB and anytime for all industrial zones noise levels up to 75 dB. With adherence to the Noise Element of the Victorville General Plan and Municipal Code, potential adverse impacts are anticipated to be less than significant.
- c) **Less Than Significant Impact** – The Project Site is located within the SCLA Capability Area 3. However, the Noise Element of the Victorville General Plan: SCLA Existing Airport Noise Contours Map, shows that the Project Site is located outside of airport noise contours. Additionally, the development of the Proposed Project would cause short term noise level increases during construction, but during operate shall not exceed the utilities standard of the noise levels up to 70 decibels (dB). Therefore, less than significant impacts are identified for airport land use plan or within the vicinity of any public or private airstrip that would be affected.



**XIII. POPULATION AND HOUSING.** *Would the proposal:*

- a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (4; 6; 10; 12; 31; 33)
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (4; 6; 10)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X

Explanations:

- a) **No Impact.** The Proposed Project does not include new construction of residential development or other uses that would directly or indirectly induce population growth in the area. The Proposed Project would continue to provide reclaimed water storage for tenants of the SCLA. Therefore, the Proposed Project would not indirectly induce population growth by increasing the available water supply. No growth-inducing impacts are anticipated to result from construction or operation of the Proposed Project. The Proposed Project would not induce substantial population growth in the area, either directly or indirectly. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** The construction and operation of the Proposed Project would occur on an existing reclaimed water storage facilities site. No housing would be removed as part of the Proposed Project and, therefore, the Proposed Project would not result in the displacement of people. As a result, construction and operation of the Proposed Project would not have impacts on the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

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

- a) Fire protection? (10)
- b) Police protection? (10)
- c) Schools? (10)
- d) Parks? (10)
- e) Other public facilities? (10)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	
			X
			X
		X	

Explanations:

a) Fire protection?

**Less Than Significant Impact.** According the General Plan the fire protection services are provided by the City of Victorville Fire Department. The closest fire station to the Project Site is SCLA Fire Station located at 18500 Readiness Street, in Victorville, approximately one-mile from the Project Site. During construction, Fire Protection District emergency access would not be impacted. Operation of the Proposed Project is passive and would not require additional fire protection. Therefore, less than significant impacts would occur to fire protection services as result of construction and operation of the Proposed Project and no mitigation is required.

b) Police protection?

**Less Than Significant Impact.** Police projection services are provided to the City of Victorville by the San Bernardino County Sheriff's Department. The closest station to the Project Site is located at 11613 Bartlett Ave in the City of Adelanto, which is approximately three miles to the west. Project operations would be passive and would not require additional police protection. The Proposed Project would not result in substantial changes to population, housing or traffic that would increase demand on police protection services. Construction and operation of the Proposed Project would not result in the need for construction of additional police protection facilities nor would it adversely affect service ratios. Therefore, less than significant physical impacts would occur to police protection services as result of construction and operation of the Proposed Project and no mitigation is required.

c) Schools?

**No Impact.** The closest school to the Project Site is Excelsior Charter School in Victorville, which is located approximately 0.5-mile to the west. However, no population increase in the Project area would result from the construction and operation of the Proposed Project and would not result in the need for physical modifications to existing school facilities. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

d) Parks?

**No Impact.** The construction and operation of the Proposed Project would not generate additional population that would increase demand for neighborhood, regional parks or other recreational facilities. There are no parks located immediately adjacent to the Proposed Project within the City of Victorville. The closest park is the Schmidt Park, which is located approximately 0.3-mile west of the Project Site. Therefore, construction and operation of the Proposed Project would not affect use of the trail. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

e) Other public facilities?

**Less Than Significant Impact.** No other public facilities are located in the vicinity of the Proposed Project. Therefore, construction of the Proposed Project would not have the potential to temporarily impact access to public facilities adjacent to the Proposed Project. Less than significant physical impacts to public facilities are anticipated from construction and operation of the Proposed Project and no mitigation is required.

**XV. RECREATION.** *Would the proposal:*

- 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? (10; 16)
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (10; 16)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X

**RECREATION**

Explanations:

- a) **No Impact.** According to the General Plan, the City of Victorville has 147.9 acres dedicated to parkland, which consist of 20 parks and recreation centers. The major regional recreational areas within and near the city are the Mojave Narrows Regional Park (840 acres), Lake Gregory (150 acres), and Mojave River Forks (1,100 acres). The three parks are operated by the County of San Bernardino Regional Parks system. The closest park to the Project Site is the Schmidt Park, which is located approximately 0.3-mile to the west. However, the Proposed Project would not generate additional population that would increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, no impacts to existing neighborhood and regional parks or other recreational centers are anticipated from construction and operation of the Proposed Project. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. Construction and operation of the Proposed Project would not include recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no impacts are expected from construction and operation of the Proposed Project.

**XVI. TRANSPORTATION.** *Would the proposal result in:*

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities? (10; 12; 17; 22)
- b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 Subdivision (b)(1)? (10; 12; 25)
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (10; 12; 22)
- d) Result in inadequate emergency access? (4; 10; 29)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
		X	
		X	
			X

Explanations:

- a) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and pumps at an existing reclaimed water facilities site. The Proposed Project is not anticipated to conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **Less Than Significant Impact.** Implementation of the Proposed Project would result in a short-term increase in trips and vehicle miles travelled (VMT) associated with construction and grading activities. Operation of the Proposed Project is not anticipated to generate more vehicle trips that typically occur at the site for repair and maintenance. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). Less than significant impacts are identified or anticipated and no mitigation measures are required.
- c) **Less Than Significant Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The Proposed Project will not include dangerous design features and will not alter existing rights-of-way locations. No off-site road improvements are associated with the Proposed Project. The Proposed Project will adhere to the goals and policies within the Circulation Element of the General Plan to ensure potential impacts are less than significant.
- d) **No Impact.** The Proposed Project replaces existing facilities on a City-owned site and would not result in changes to emergency access. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

**XVIII. TRIBAL CULTURAL RESOURCES.**

- 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) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by Public Resources Code section 5020.1(k), or
  - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

<i>Potentially Significant Impact</i>	<i>Less Than Significant w/Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
		X	
		X	
	X		

Explanations:

- a, i-ii) **Less Than Significant.** California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a Proposed Project, if the tribe requested to the lead agency, in writing, to be informed of proposed projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

McKenna et al. (McKenna) completed a Phase I Cultural Resources Investigation for the Proposed Project in October 2019, which included communication with Native American tribes. The Phase I Cultural Resources Investigation concluded the Project area is moderately sensitive for historic archaeological resources. On August 15, 2019, McKenna submitted a written request to the State of California Native American Heritage Commission (NAHC) for a records search in the commission's Sacred Lands File. Following the NAHC's recommendations and previously established consultation protocol, McKenna further contacted the ten listed persons/tribes in writing on August 21, 2019 in accordance with CEQA for additional information on potential Native American cultural resources in the vicinity.

The Phase I Cultural Resources Investigation states only one response was received on August 26, 2019 from Jessica Mauck of the San Manuel Band of Mission Indians. The response indicated that the project area is within the ancestral territory of the Serrano and is highly sensitive for both archaeological resources and sacred sites. Significant sites noted include the Turner Springs site and Oro Grande, both having been associated with the presence of human remains and grave goods. Both sites have been tested and determined eligible for listing in the National Register of Historic Places. Neither site will be impacted by the Proposed Project, but associated resources may still be present, given their proximity to the APE and the presence of the Mojave River to the east.

In accordance with AB52, the City of Victorville also provided letters to tribes that requested receiving information. Ms. Jessica Mauck of the San Manuel Band of Mission Indians provided an email response to the City on November 25, 2019. In her email response Ms. Mauck indicated that the Project area exists within a sensitive portion of Serrano ancestral territory and, therefore, is of interest to the Tribe. Ms. Mauck requested copies of the Cultural and Geotechnical reports prepared for the Project Site. As stated in Ms. Mauck's response, the provision of information within these reports would assist San Manuel Band of Mission Indians in ascertaining how the Tribe will assume consulting party status under CEQA and participate, moving forward, in project review and implementation.

In a follow up email, Ms. Mauck concluded that based on the size/scope of the Project, as well as the soil sample results, SMBMI does not have major concerns at this time. However, since the Project site occurs within a highly sensitive area, SMBMI's standard mitigation was provided. Ms. Mauck stated that SMBMI is not requesting monitoring either archaeological or Tribal but is requesting that the measures be utilized if the City does require monitoring. Therefore, to ensure potential impacts to Tribal Cultural Resources are reduced the following mitigation measures shall be implemented.



***Mitigation Measure TCR-1: OPTIONAL***

In the event the City elects to implement monitoring, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. A Monitoring and Treatment Plan that is reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

***Mitigation Measure TCR-2:***

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) 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.

***Mitigation Measure TCR-3:***

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 SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

***Mitigation Measure TCR-4:***

The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in TCR-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 SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

**Mitigation Measure TCR-5:**

**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 SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.**

**XVIX. UTILITIES AND SERVICE SYSTEMS. Would the project:**

	Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (3; 16; 19; 30)				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (1; 3; 10; 21; 27)				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (3; 16; 19; 30)				X
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (3; 10; 30)			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (3)			X	

**Explanations:**

- a) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. All existing operations at the site would continue except the storage pond which will be replaced by the new tank. The Proposed Project. The Proposed Project would therefore not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** As discussed above, the Proposed Project would not require sewer collection or wastewater treatment services and therefore no new wastewater treatment facilities or expansion of existing facilities would be required. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **No Impact.** The Proposed Project would not require new wastewater treatment facilities or expansion of existing facilities. The development of the Proposed Project will include replacement of reclaimed water storage facilities and does not include any uses that would exceed wastewater

treatment requirements. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- d,e) **Less Than Significant Impact.** According to the General Plan, the City of Victorville deposits trash at the Victorville Landfill, which 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. Construction debris would be recycled and/or transported to the Victorville Landfill. The temporary generation of construction debris would not permanently affect the long-term landfill capacity. Operation of the Proposed Project would not generate solid waste. As a result, less than significant impacts to landfill capacity are anticipated and no mitigation is required.

**XX. WILDFIRE.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- a) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or other uncontrolled spread of a wildfire?
- b) 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?
- c) 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?

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X
			X
			X

- a) **No Impact.** The Project Site does not contain any emergency facilities, nor is located adjacent to an emergency evacuation route. During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City of Victorville fire and police. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** As discussed in the City's General Plan Safety Element, the National Fire Protection Association defines a wildland fire as "any forest, grass, brush or tundra fire involving lands not under cultivation." An urban fire is a fire that occurs in developed areas which may include structures and vehicles. The Project Site occurs in an urban area; no forest land or significant areas of bio mass occur near the Project Site that would fuel a wildfire. The City of Victorville has adopted a Fire Hazard Abatement Ordinance (Chapter 8.09, Victorville Municipal Code) which requires the abatement of weeds in excess of three inches above the grade in the area of growth on such portion of the lot or premises within one hundred feet of any structure. Russian Thistle (tumbleweeds) are not permitted to grow in excess of three inches within City limits on any property, regardless of surrounding improvements. Adherence to this ordinance reduces the

likelihood of fires on undeveloped lands and on vacant lots in the developed portions of the Planning Area. During a recent site visit conducted in October 2019, the Project Site is mostly lack of any vegetation and visibility of the soils was a prominent feature. Therefore, the Proposed Project is not anticipated to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. The Proposed Project will not 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. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** The Proposed Project includes replacement of an existing in-ground lined pond with a new 1 MG prestressed circular reservoir and relocation of the existing underground piping and the pumps. According to the San Bernardino County Land Use Plan: Hazards Overlay: EH30B, the Proposed Project is not within an area that will expose people or structures to a significant risk of loss, injury or death involving flooding as no flood hazards traverse the project area, nor is the Project Site subject to, wildfire or inundation by mudflow hazards. The Proposed Project will not 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. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

#### XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (1; 3; 10; 13)
- 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. (10; 25; 30)
- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? (1; 2; 10; 33)

Potentially Significant Impact	Less Than Significant w/Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	
		X	

#### Explanations:

- a) **Less Than Significant Impact.** According to the General Plan, the Project Site does not occur within an area identified as Critical Habitat. A Desert Tortoise Survey was performed by ECORP

Consulting, Inc. on November 27, 2018. According to the survey, the Project Site consists of approximately 10 acres of disturbed habitat. The Project Site contained compacted soils and remnant piles of disturbed soil. The SCLA Specific Plan states that the wildlife population within the former Base is described as having “low stable population levels.” Both the diversity and abundance of wildlife are limited by lack of adequate food, sparse ground cover which limits nesting sites, and an unreliable source of water. During the desert tortoise surveys, no desert tortoise, desert tortoise burrows, or sign of desert tortoise (e.g., scat, tracks, etc.) were identified on the Project Site.

In October 2019, McKenna prepared a Phase I Cultural Resources Investigation for the Proposed Project. An archaeological records check was completed at the California State University, Fullerton, South Central Coastal Information Center (CSUF-SCCIC) identified a minimum of 52 cultural resources investigations within a one-mile of the Project Site. Research also identified 36 cultural resources within one mile of the Area of Potential Effects. McKenna found the project area is sensitive for paleontological resources and prehistoric archaeological resources. The project area is moderately sensitive for historic archaeological resources. Implementation of Mitigation Measures BIO-1, and CR-1 to CR-3, as provided in this Initial Study, would ensure impacts to biological and cultural resources are less than significant. Therefore, no significant adverse impacts are identified or anticipated and no additional mitigation measures are required.

- b) **Less Than Significant Impact.** Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

(a) Cumulative impacts shall be discussed when the project’s incremental effect is cumulatively considerable.

(b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Impacts associated with the Proposed Project would not be considered individually or cumulatively adverse or considerable. Impacts identified in this Initial Study can be reduced to a less than significant impact. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The incorporation of design measures, City of Victorville policies, standards, and guidelines and proposed mitigation measures would ensure that the Proposed Project would have no substantial adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.



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