

INITIAL STUDY

FOR THE

**AMERICAN ORGANICS VICTOR VALLEY
REGIONAL COMPOSTING FACILITY
EXPANSION PROJECT**

Prepared for:

Victor Valley Wastewater Reclamation Authority

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LIST OF ABBREVIATIONS AND ACROYNMS

| | |
|--------|--|
| AAQS | Ambient Air Quality Standards |
| amsl | above mean sea level |
| APE | Area of Potential Effect |
| AQMP | Air Quality Management Plan |
| ASP | Aerated Static Pile |
| BACMs | Best Available Control Measures |
| BMPs | Best Management Practices |
| BRA | Biological Resources Assessment |
| BUOW | Burrowing Owl |
| C&D | Construction and Demolition |
| CAAA | Clean Air Act Amendment |
| CAAQS | California Ambient Air Quality Standards |
| CARB | California Air Resources Board |
| CBM | California Bio-Mass |
| CCAR | California Climate Action Registry (now called Climate Action Reserve) |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CNEL | Community Noise Equivalent Level |
| CO | Carbon Monoxide |
| CWA | Clean Water Act |
| dB | decibel |
| dBA | A-weighted decibel |
| DOI | Department of Interior |
| ESA | Endangered Species Act |
| FGC | Fish & Game Code |
| FTA | Federal Transit Association |
| GCC | Global Climate Change |
| GHG | Greenhouse Gas |
| HABS | Historic American Buildings Survey |
| HAER | Historic American Engineering Record |
| LRA | Local Responsible Area |
| LSA | Lake or Streambed Alteration Agreement |
| LST | Localized Significance Thresholds |
| LUST | Leaking Underground Storage Tank |
| MBTA | Migratory Bird Treaty Act |
| MDAB | Mojave Desert Air Basin |
| MDAQMD | Mojave Desert Air Quality Management District |
| MM | Mitigation Measure |
| MTP | Monitoring and Treatment Plan |
| NAAQS | National Ambient Air Quality Standards |
| NBP | Nesting Bird Plan |
| NOx | Nitrogen Oxides |
| NPDES | National Pollutant Discharge Elimination System |

| | |
|-------|--|
| NRHP | National Register of Historic Places |
| PM | particulate matter |
| ROG | Reactive Organic Gases |
| RWQCB | Regional Water Quality Control Board |
| SBCFD | Victorville Fire Department, San Bernardino County |
| SCAG | Southern California Association of Governments |
| SCE | Southern California Edison |
| SCLA | Southern California Logistics Airport |
| SIP | State Implementation Plan |
| SMBMI | San Manuel Band of Mission Indians |
| SOx | Sulfur Oxides |
| SRA | State Responsibility Area |
| SWPPP | Storm Water Pollution Prevention Plan |
| TRC | Tribal Cultural Resources |
| USDA | U.S. Department of Agriculture |
| USEPA | U.S. Environmental Protection Agency |
| USFWS | U.S. Fish and Wildlife Service |
| USGS | U.S. Geological Survey |
| VdB | vibration-velocity decibel |
| VMT | Vehicle Miles Traveled |
| VVRCF | (or Facility) Victor Valley Regional Composting Facility |
| VVWRA | Victor Valley Wastewater Reclamation Authority |
| WEAP | Worker Education Awareness Program |
| WoUS | Waters of the United States |
| WQMP | Water Quality Management Plan |

ENVIRONMENTAL CHECKLIST

1. Project Title: American Organics Victor Valley Regional Composting Facility Expansion Project
2. Lead Agency Name: Victor Valley Wastewater Reclamation Authority
Address: 20111 Shay Road, Victorville, California 92394
3. Contact Person: Darron Poulsen
Phone Number: (760) 246-8638
4. Project Location: The Victor Valley Regional Composting Facility (Facility) is located at the northern terminus of Shay Road in the City of Victorville, San Bernardino County, California at 20055 Shay Road, Victorville, CA 92394. The proposed area for expansion is located just north of the 28.8-acre area in which the Facility currently operates. The project will also include grading the area just north and west of the Facility across the street on Shay Road. The cadastral location is Section 13, Township 6 North, Range 5 West, San Bernardino Meridian. The site can be viewed on the USGS – Victorville Quadrangle, 7.5 Minute Series topographic map. The regional and site location are shown on Figures 1 and 2.
5. Project Sponsor's Name and Address: American Organics
20055 Shay Road Victorville, CA 92394
6. General Plan Designation: Open Space, Specific Plan (Southern California Logistics Airport)
7. Zoning Classification: Exclusive Agricultural (A-E)
8. Project Description:

Introduction

The Victor Valley Wastewater Reclamation Authority (VWVRA) is a Joint Powers Authority and Public Agency in the State of California formed in December of 1977. VWVRA is responsible for the regional collection, treatment, and disposal of wastewater in Victor Valley. The Victor Valley Regional Compost Facility (VVRFC or Facility) is currently operated and managed by American Organics; the property encompassing the existing operations as well as the proposed area for expanded operations is leased from VWVRA. American Organics will expand their existing Victor Valley Regional Composting Facility to enable further storage and processing of composted materials.

Beginning in April of 2000, California Bio-Mass Inc (CBM) operated the composting facility on the site owned by VWVRA; however, American Organics became the new operator on November 15, 2009. The Facility is permitted to accept green waste, wood waste, manure, wallboard, paper, pre- and post- consumer food material, liquid wastes, biosolids, and C&D material. The Facility uses a combination of windrow and static pile processing, though some material is shipped prior to composting. Class A biosolids from the adjacent VWVRA wastewater treatment plant are not

stored on site, but may be accepted for blending with other organic materials for use as a soil amendment. The majority of the compost produced is used in local agricultural projects. The VVRCF is a fully permitted Compost Manufacturing Facility that complies with all State, and local requirements.

American Organics completed the American Organics Victor Valley Regional Composting Facility Modification Project in 2020. This Project added new features to enhance the operations of the Facility, including a 21,600 SF Receiving and Classification Process Building, new Scale and Administration facilities, Grinding Classification and Conveyers, a Finished Material Storage area, 113,920 SF Aerated Static Pile (ASP) Concrete Pads, a Leachate collection and removal system, and one lined Retention Basin. These new features have reduced the amount of available area in which to process/blend composted materials and store finished products.

Project Description

The proposed project will expand the VVRCF operated by American Organics on VVWRA owned land from 28.8 acres to include two new operations areas that are contiguous or adjacent to the existing VVRCF operations. The Project proposes to expand the existing area in which the VVRCF operates to the north and west by utilizing the adjacent parcel to create a larger contiguous lot within which to operate. Unlike the completed Modification, the proposed Expansion Project would not require any additional infrastructure in support of the expanded area of operation. The area of expansion is illustrated on Figure 3. Once the Expansion Project is complete the entirety of the VVRCF operations will be expanded from 28.8 acres to encompass an area of 47.9 acres. The eastern area, which is directly north of the existing VVRCF operations will be 9.0 acres, which includes graded slopes and a lined retention basin; the net operating area is 5.48 acres. The western area will be 10.1 acres, which includes graded slopes; the operating area is 6.99 acres. The total site area, excluding areas of avoidance is 19.1 acres for a total VVRCF site area of 47.9 acres once the Expansion Project is complete. The new operational area, 12.47 acres, will be utilized for blending/processing of composted materials and as finished product storage. American Organics will operate within its current permitted daily intake and maximum capacity. The purpose of the proposed project is to provide additional area within which to accommodate operation of the VVRCF under the new layout that has been implemented as part of the Modification Project. The Expansion Project would accommodate the required area to operate the VVRCF given that a substantial area has been dedicated to the installation of upgraded technologies that were completed as part of the previously approved Modification Project.

Figures 2 and 3 depict the area of disturbance proposed as part of the VVRCF Expansion Project. In order to utilize west side for storage of finished product, American Organics envisions utilizing the stockpiled materials that are currently stored within the west side to fill and grade the east side of the site. The stockpiled materials will be transferred to the east side of the site after this area has been cleared of all vegetation. Once the stockpiled material has been removed from the west side, American Organics envisions that this site will be graded to conform to the street level of Shay Road and will be used to store finished product. Stockpiled material the west side will be used to fill and grade the east side to be level with the VVRCF site to enable the current area of operation and the east side of the proposed project site to become one contiguous site, thereby facilitating the expanded operations to include greater area for blending/processing of composted materials and as finished product storage.

The Project includes measure to control onsite runoff through the development of a retention basin located at the eastern middle portion of the east side as shown on Figure 3. Upon

completion of construction, the entirety of the expanded VVRCF site—inclusive of the existing operations area and the east side of the proposed project site—will be fenced. The west side of the proposed project site will be enclosed with a fence to store finished product, and will include a private entrance that would enable VVRCF Staff access to the storage area; this area will not be accessible to customers. Additionally, American Organics proposes private entrance that would enable emergency access to the expanded portion of the site; however, no new customer entrances are proposed.

Construction Scenario

The proposed project is expected to begin construction for the expanded VVRCF operations in 2022. It is estimated that the expanded area for VVRCF operations will be completed by Q1 of 2023. The project does not propose any new structures, though the VVRCF expansion area will be fenced to form an expanded, contiguous area of operation. It is anticipated that the construction will occur in the following order (generally):

- 1: Clear and prep VVRCF Expansion area.
- 2a: Remove stockpiled material from the west side and transport it to the VVRCF expansion site.
- 2b: Compact and grade VVRCF Expansion area as stockpiled fill material is transferred to the site. Excavate the area required to install the retention basin at the eastern middle portion of the east side of the site.
- 2c: Compact and grade the west side at grade with Shay Road as stockpiled material is transferred to the VVRCF site.
 - Note: items 2a, 2b, and 2c may occur concurrently.
- 3: Fence entire VVRCF site, and remove the existing fence between the expanded operational area and existing operational area. Fence the west side.
- 4: Install underground water line and fire hydrants that may be required by the City of Victorville.

Delivery of construction supplies and removal of any of the materials cleared from the VVRCF Expansion site, if necessary, will be accomplished using trucks during normal working hours, with a maximum of 20 round trips per day, though it is anticipated that an average of 10 round trips per day for 200 working days would occur. It is anticipated that a maximum number of 10 employees will be required to support the construction of the project each day. Grading will be by traditional mechanized grading and compaction equipment. Stockpiled materials will be transferred and placed utilizing 30 yard scrapers that will travel back and forth between the two sections of the site for the majority of construction. Equipment utilized will be traditional site development equipment of scrapers, wheel compactors, vibratory compactors, water trucks, petroleum powered fork lifts, and various hand tools traditional to grading operations. Note that the east side will be cleared of vegetation in the operational areas, and will generally be filled without extensive cut and fill except where the proposed retention basin is to be located. This is intended to minimize the potential to disturb any potential cultural or tribal cultural resources.

9. Surrounding land uses and setting: (Briefly describe the project's surroundings)

The area surrounding the project site is rural in nature with very little development surrounding the project. The project site is located in the high desert region of San Bernardino County. The land uses surrounding the project are as follows:

- To the South is the VVRCF, and beyond that the land is vacant, with vegetation characteristic of the High Desert. The land uses to the south are Specific Plan (Southern California Logistics Airport) and Open Space
 - To the North is VVWRA, which is located on land designated for Open Space and Specific Plan (Southern California Logistics Airport);
 - To the East of the project site is the Mojave River; this area located outside of the boundaries of Victorville, in unincorporated San Bernardino County
 - To the West of the project site is land owned and managed by VVWRA in support of their operations. Farther to the west is the Southern California Logistics Airport. Land to the west of the project site is designated as Specific Plan (Southern California Logistics Airport).
10. Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)
- CalRecycle
 - Lahontan Regional Water Quality Control Board
 - San Bernardino County Local Enforcement Agency
 - City of Victorville
11. Have California Native American tribes traditionally and cultural affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? Yes, Letters have been sent out as of early 2021.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION (To be completed by the Lead Agency)

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

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

Tom Dodson & Associates

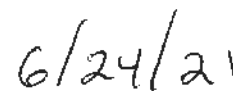
Prepared by



Lead Agency (signature)

June 2021

Date



Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

SUBSTANTIATION

- a. *Less Than Significant Impact* – The proposed Project consists of grading and compacting a vacant, vegetated site adjacent to the existing VVRCF site, and relocating stockpiled material within Planning Area 1 to the west side. The Project is located in the northeast part of the City of Victorville within San Bernardino County within a property owned by VVWRA, and as such is surrounded by facilities typical of wastewater treatment operations. The Project will occur within the overall area leased by American Organics shown on Figures 1 and 2. Adjacent to the project site to the east is the Mojave River, which contains vegetation common in desert areas with access to water. There are rolling hills farther to the east and also adjacent to the project site to the west.

Adverse impacts to scenic vistas can occur in one of two ways. First, an area itself may contain existing scenic vistas that would be altered by new development. A review of the project area determined that there are no scenic vistas within the project site. The Expansion area of the project site is vacant containing vegetation that is typical of the high desert within which the Project is located, while the west side contains stockpiled dirt that will be transferred to the project site as part of this Project. A scenic vista impact can also occur when a scenic vista can be viewed from the project area or immediate vicinity and a proposed development may interfere with the view to a scenic vista. As stated above, the proposed Project is located in an area surrounded on 3 directions (south, west, and north) by development within the VVWRA owned site, including the existing VVRCF operations, and the various components of VVWRA's wastewater treatment plant operations. To the west, and at a lower elevation is the Mojave Riverbed, which contains native vegetation, but is not generally accessed by the public. Further to the west are several cement plant operations with structures spanning over 50 feet in height. At present, the Project contains native vegetation; once the Expansion area is graded and compacted, the Expansion area will not contain any new structures beyond a fence to contain the entirety of the expanded VVRCF site. The Expansion area will contain additional windrow and static pile processing, as well as finished material storage, which will conform with what currently exists within the VVRCF site. As such, given the disturbed nature of the overall project area, no scenic vistas have been identified that would be impacted by the expansion of the VVRCF area of operations. Furthermore, given that the adjacent uses are highly disturbed to the north, west, and south, and that the proposed Project would conform to the surrounding uses, the proposed Project would have a less than significant potential to impact a scenic vista. No mitigation is required.

- b. *Less Than Significant Impact* – The project footprint does not contain any scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway corridor. No scenic resources, such as historical buildings, trees, or rock outcropping, would be removed, altered, or obstructed as part of the proposed Project. The Project is located within a vacant area that is part of VVWRA's overall property within which it operates its wastewater treatment plant. The west side are currently vacant and contain native vegetation; Planning Area 1 contains stockpiled material that will be transferred to the west side. The Project anticipates avoiding a spring adjacent to the west side that has enabled vegetation characteristic of that which is adjacent to the Mojave River to occur within the area linearly adjacent to the spring. This unique feature will be entirely avoided by the proposed Expansion Project, and as such, given that no other known scenic resources exist within or adjacent to the project site, there is a less than significant potential to substantially damage scenic resources within a state scenic highway corridor. No mitigation is required.
- c. *Less Than Significant Impact* – The Project is located within the VVWRA operations site, which is located in a relatively rural area with surrounding industrial and infrastructure related development to the north (VVWRA), east (cement plants), and west (VVWRA, and further west the Southern California Logistics Airport [SCLA]). The area surrounding the Project is sparsely populated due to the industrial type of development that exists in this area. As such, the expansion of the operational area for the VVRCF would not substantially change the visual character of this site because the adjacent site contains the existing VVRCF operations, and the Expansion site would be visually similar. As such, the expansion of the VVRCF operations to the north and northeast would not alter the visual character or public views to the site because of the similar development that surrounds the site. As such the proposed VVRCF Expansion is anticipated to blend in with the existing visual setting, and as a result, impacts to the visual character and quality of public views of the site are considered less than significant. No mitigation is required.
- d. *Less Than Significant Impact* – The construction activities are limited to daylight hours unless an emergency occurs, and the amount of security lighting needed during construction will be minimal. The Project is surrounded by similar uses, including the existing VVRCF and VVWRA operations. There are no nearby residences or sensitive uses that would be significantly impacts by light or glare in the vicinity of the project site. As such, though the proposed Project may involve the installation of some lighting in support of operations at the Expansion sites, it is not anticipated that any sensitive receptors would be impacted by this expanded source of lighting. Furthermore, the VVRCF currently utilizes lighting throughout the site to support its operations, as does the VVWRA wastewater treatment plant site to the north. As such, the installation of an additional source of light at this site and within this area would not have a potential to adversely affect day or nighttime views in the area. Impacts under this issue are considered less than significant.

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

SUBSTANTIATION

- a. *Less Than Significant Impact* – The proposed Project is located within a site designated for Open Space and Specific Plan (SCLA), and zoned for Exclusive Agriculture and Specific Plan (SCLA). Though the site is zoned for Exclusive Agriculture use, the project site is currently owned as part of VVWRA's wastewater treatment site, and as such this land is land use independent. Regardless, according to the California Department of Conservation California Important Farmland Finder, the project site is located within an area designated as "Grazing Land" (Figures II-1 and II-2). Grazing land is not a type of Prime Farmland, Unique Farmland or Farmland of Statewide Importance. Furthermore, given the Project's location within an established site, there is no potential to utilize this site for grazing land at this time. As such, no adverse impact to any agricultural resources would occur from implementing the proposed Project. No mitigation is required.

- b. *Less Than Significant Impact* – There are no agricultural uses currently on the project site or on adjacent properties. The project site is zoned for Exclusive Agriculture use, and the land use designations are Open Space and Specific Plan (SCLA). As stated above, while the zoning classification allows agricultural use, the area within which the Expansion Project will be developed is located within VVWRA's wastewater treatment operations site, which does not support any agricultural operations beyond the composting activities that take place at the VVRCF. Additionally, according to the City of Victorville's development code, the proposed Facility Expansion is considered a conditionally allowable use within the Exclusive Agriculture use. Furthermore, the proposed Project is not located on a site that contains any Williamson Act contracts. Therefore, there is a less than significant potential for a conflict between the proposed Project and agricultural zoning or Williamson Act contracts within the project area. No mitigation is required.
- c. *No Impact* – Please refer to sections a) and b) above. The project site is zoned for Exclusive Agriculture use, and the land use designations are Open Space and Specific Plan (SCLA). None of these land uses or zoning classifications support forest land or timberland uses or designations. No potential exists for a conflict between the proposed Project and forest/timberland zoning. No mitigation is required.
- d. *No Impact* – There are no forest lands within the project area because the project area is urbanized and located in the high desert. No potential for loss of forest land would occur if the Project is implemented. No mitigation is required.
- e. *Less Than Significant Impact* – Though the proposed Expansion site is zoned for Exclusive Agriculture use, the project site and surrounding area do not currently support either agricultural or forestry uses. Furthermore, because the project site will be utilized to expand a composting operation, which is considered a "Facility" use that is conditionally allowed under the Exclusive Agriculture zoning classification. As such, implementation of the proposed Project is anticipated to have a less than significant potential to cause or result in the conversion of farmland or forest land to alternative use. No adverse impact would occur. No mitigation is required.

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the *Air Quality and GHG Impact Analyses, American Organics Victor Valley Regional Composting Facility Expansion Project, Victorville, California* prepared by Giroux and Associates dated January 24, 2020 (Appendix 1).

Background

Climate

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

Air Quality Standards

Monitored air quality is evaluated and in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table III-1. Because the State of California had established Ambient Air Quality Standards (AAQS) several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table III-1. Sources and health effects of various pollutants are shown in Table III-2.

Of the standards shown in Table III-1, those for ozone (O₃), and particulate matter (PM-10) are exceeded at times in the Mojave Desert Air Basin (MDAB). They are called "non-attainment pollutants." Because of the variations in both the regional meteorology and in area-wide differences in levels of air pollution emissions, patterns of non-attainment have strong spatial and temporal differences.

Table III-1
AMBIENT AIR QUALITY STANDARDS

| Pollutant | Average Time | California Standards ¹ | | National Standards ² | | |
|---|------------------------------|-----------------------------------|--|---|--------------------------------|--|
| | | Concentration ³ | Method ⁴ | Primary ^{3,5} | Secondary ^{3,6} | Method ⁷ |
| Ozone (O3) ⁸ | 1 Hour | 0.09 ppm (180 µg/m³) | Ultraviolet Photometry | – | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m³) | | 0.070 ppm (137 µg/m³) | | |
| Respirable Particulate Matter (PM10) ⁹ | 24 Hour | 50 µg/m³ | Gravimetric or Beta Attenuation | 150 µg/m³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m³ | | – | | |
| Fine Particulate Matter (PM2.5) ⁹ | 24 Hour | – | – | 35 µg/m³ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m³ | Gravimetric or Beta Attenuation | 12.0 µg/m³ | 15.0 µg/m³ | |
| Carbon Monoxide (CO) | 1 Hour | 20 ppm (23 mg/m³) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m³) | – | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9 ppm (10 mg/m³) | | 9 ppm (10 mg/m³) | – | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m³) | | – | – | |
| Nitrogen Dioxide (NO2) ¹⁰ | 1 Hour | 0.18 ppm (339 µg/m³) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m³) | – | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m³) | | 0.053 ppm (100 µg/m³) | Same as Primary Standard | |
| Sulfur Dioxide (SO2) ¹¹ | 1 Hour | 0.25 ppm (655 µg/m³) | Ultraviolet Fluorescence | 75 ppb (196 µg/m³) | – | Ultraviolet Flourescence; Spectrophotometry (Paraosaniline Method) |
| | 3 Hour | – | | – | 0.5 ppm (1300 µg/m³) | |
| | 24 Hour | 0.04 ppm (105 µg/m³) | | 0.14 ppm (for certain areas) ¹¹ | – | |
| | Annual Arithmetic Mean | – | | 0.030 ppm (for certain areas) ¹¹ | – | |
| Lead 8 ^{12,13} | 30-Day Average | 1.5 µg/m³ | Atomic Absorption | – | – | – |
| | Calendar Quarter | – | | 1.5 µg/m³ (for certain areas) ¹² | Same as Primary Standard | High Volume Sampler and Atomic Absorption |
| | Rolling 3-Month Avg | – | | 0.15 µg/m³ | | |
| Visibility Reducing Particles ¹⁴ | 8 Hour | See footnote 14 | Beta Attenuation and Transmittance through Filter Tape | No Federal Standards | | |
| Sulfates | 24 Hour | 25 µg/m³ | Ion Chromatography | | | |
| Hydrogen Sulfide | 1 Hour | 0.03 ppm (42 µg/m³) | Ultraviolet Fluorescence | | | |
| Vinyl Chloride ¹² | 24 Hour | 0.01 ppm (26 µg/m³) | Gas Chromatography | | | |

Footnotes

- 1 California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter – PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- 2 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year, with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$, is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.
- 3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- 4 Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- 5 National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- 6 National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- 7 Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
- 8 On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- 9 On December 14, 2012, the national PM2.5 primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standard of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM10 standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- 10 To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- 11 On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- 12 The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- 13 The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ($1.5 \mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- 14 In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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

| Pollutants | Sources | Primary Effects |
|-------------------------------------|--|---|
| Carbon Monoxide (CO) | <ul style="list-style-type: none"> • Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter. | <ul style="list-style-type: none"> • Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina). |
| Nitrogen Dioxide (NO ₂) | <ul style="list-style-type: none"> • Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions. | <ul style="list-style-type: none"> • Aggravation of respiratory illness. • Reduced visibility. • Reduced plant growth. • Formation of acid rain. |
| Ozone (O ₃) | <ul style="list-style-type: none"> • Atmospheric reaction of organic gases with nitrogen oxides in sunlight. | <ul style="list-style-type: none"> • Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function. • Plant leaf injury. |
| Lead (Pb) | <ul style="list-style-type: none"> • Contaminated soil. | <ul style="list-style-type: none"> • Impairment of blood function and nerve construction. • Behavioral and hearing problems in children. |
| Fine Particulate Matter (PM-10) | <ul style="list-style-type: none"> • Stationary combustion of solid fuels. • Construction activities. • Industrial processes. • Atmospheric chemical reactions. | <ul style="list-style-type: none"> • Reduced lung function. • Aggravation of the effects of gaseous pollutants. • Aggravation of respiratory and cardio respiratory diseases. • Increased cough and chest discomfort. • Soiling. • Reduced visibility. |
| Fine Particulate Matter (PM-2.5) | <ul style="list-style-type: none"> • Fuel combustion in motor vehicles, equipment, and industrial sources. • Residential and agricultural burning. • Industrial processes. • Also, formed from photochemical reactions of other pollutants, including NO_x, sulfur oxides, and organics. | <ul style="list-style-type: none"> • Increases respiratory disease. • Lung damage. • Cancer and premature death. • Reduces visibility and results in surface soiling. |
| Sulfur Dioxide (SO ₂) | <ul style="list-style-type: none"> • Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes. | <ul style="list-style-type: none"> • Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc. |

Source: California Air Resources Board, 2002.

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

Similarly, the ARB extensively evaluated health effects of ozone exposure. A new state standard for an 8-hour ozone exposure was adopted in 2005, which aligned with the exposure period for the federal 8-hour standard. The California 8-hour ozone standard of 0.07 ppm is more stringent than the federal 8-hour standard of 0.075 ppm. The state standard, however, does not have a specific attainment deadline. California air quality jurisdictions are required to make steady progress towards attaining state standards, but there are no hard deadlines or any consequences of non-attainment. During the same re-evaluation process, the ARB adopted an annual state standard for nitrogen dioxide (NO₂) that is more stringent than the corresponding federal standard, and strengthened the state one-hour NO₂ standard.

As part of EPA's 2002 consent decree on clean air standards, a further review of airborne particulate matter (PM) and human health was initiated. A substantial modification of federal clean air standards for PM was promulgated in 2006. Standards for PM-2.5 were strengthened, a new class of PM in the 2.5 to 10 micron size was created, some PM-10 standards were revoked, and a distinction between rural and urban air quality was adopted. In December, 2012, the federal annual standard for PM-2.5 was reduced from 15 µg/m³ to 12 µg/m³ which matches the California AAQS. The severity of the basin's non-attainment status for PM-2.5 may be increased by this action and thus require accelerated planning for future PM-2.5 attainment.

Baseline Air Quality

Monitoring of air quality in the MDAB is the responsibility of the Mojave Desert Air Quality Management District (MDAQMD) headquartered in Victorville, California. Existing levels of criteria air pollutants in the project area can generally be inferred from measurements conducted at the Victorville Station at 14306 Park Avenue. Although the Victorville Station monitors most of the spectrum of pollutants, data for CO is no longer monitored in the Mojave Desert. Table 4 summarizes the last three years of monitoring data from the available data at for this Victorville monitoring station. From these data one can infer that baseline air quality levels near the project site are occasionally unhealthful, but that such violations of clean air standards usually affect only those people most sensitive to air pollution exposure.

- a. Photochemical smog (ozone) levels occasionally exceed standards. The 8-hour state ozone standard has been exceeded approximately 7 percent of all days in the last three years while the 1-hour state standard has been exceeded less than one percent of all days. The 8-hour federal standard has been exceeded approximately 5 percent of all days in the past three years. Attainment of all clean air standards in the project vicinity is not likely to occur soon, but the severity and frequency of violations is expected to continue to slowly decline during the current decade
- b. Respirable dust (PM-10) levels often exceed the state standard of 50 µg/m³ but the less stringent federal PM-10 standard of 150 µg/m³ is violated with much less frequency. However, given the high Max. 24-Hour concentrations it is clear that PM-10 is still of concern.
- c. A substantial fraction of PM-10 is comprised of ultra-small diameter particulates capable of being inhaled into deep lung tissue (PM-2.5). There has only been one measured violation in the last three years.

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

**Table III-3
PROJECT AREA AIR QUALITY MONITORING SUMMARY (2016-2018)
(DAYS STANDARDS WERE EXCEEDED AND MAXIMUM OBSERVED LEVELS)**

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

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

Source: Victorville Station: Ozone, CO, NO₂, PM-10, PM-2.5
data: www.arb.ca.gov/adam/

Air Quality Standards

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

| | | |
|------------------------------------|--------------------|-------------------|
| Carbon Monoxide (CO) | 548 pounds/day | 100 tons/year |
| Nitrogen Oxides (NO _x) | 137 pounds/day | 25 tons/year |
| Sulfur Oxides (SO _x) | 137 pounds/day | 25 tons/year |
| Reactive Organic Gases (ROG) | 137 pounds/day | 25 tons/year |
| Particulate Matter (PM-10) | 82 pounds/day | 15 tons/year |
| Particulate Matter (PM-2.5) | 65 pounds/day | 12 tons/year |
| GHG | 548,000 pounds/day | 100,000 tons/year |

Impact Analysis

- a. *Less Than Significant Impact* – Projects such as the proposed American Organics Victor Valley Regional Composting Facility Expansion Project do not directly relate to the AQMP in that there are no specific air quality programs or regulations governing general development. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The City requires compliance with the Municipal Code for project such as this, and American Organics intends to meet these standards. The American Organics Victor Valley Regional Composting Facility Expansion Project will be fully consistent with both the General Plan designation and Zone classification for the project site. This is because the proposed Project is zoned for Exclusive Agriculture use, and the land use designations are Open Space and Specific Plan (SCLA). While the zoning classification allows agricultural use, the area within which the Expansion Project will be developed is located within VVWRA's wastewater treatment operations site, which does not support any agricultural operations beyond the composting activities that take place at the VVRCF. According to the City of Victorville's Development Code, the proposed Facility Expansion is considered a conditionally allowable use within the Exclusive Agriculture use. Thus, the proposed project is consistent with regional planning forecasts maintained by the Southern California Association of Governments (SCAG) regional plans. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis. As the analysis of project-related emissions provided below indicates, the proposed project will not cause or be exposed to significant air pollution, and is, therefore, consistent with the applicable air quality plan.
- b. *Less Than Significant With Mitigation Incorporated* – Air pollution emissions associated with the proposed Project would occur over both a short and long-term time period. Short-term emissions include fugitive dust from construction activities (i.e., site prep, demolition, grading, and exhaust emission) at the proposed project site. Long-term emissions generated by expanded operation of the VVRCF includes dust from the expanded operations.

Adjacent Uses

The project site is located in the high desert region of San Bernardino County. The area surrounding the project site is rural in nature with very little development. There are no sensitive uses within one mile of the facility. The land uses surrounding the project are as follows:

- To the South is the VVRCF, and beyond that the land is vacant, with vegetation characteristic of the High Desert. The land uses to the south are Specific Plan (Southern California Logistics Airport) and Open Space
- To the North is VVWRA, which is located on land designated for Open Space and Specific Plan (Southern California Logistics Airport);
- To the East of the project site is the Mojave River; this area located outside of the boundaries of Victorville, in unincorporated San Bernardino County
- To the West of the project site is land owned and managed by VVWRA in support of their operations. Farther to the west is the Southern California Logistics Airport. Land to the west of the project site is designated as Specific Plan (Southern California Logistics Airport).

Construction Emissions

CalEEMod was developed by the SCAQMD to provide a model by which to calculate both construction emissions and operational emissions from a variety of land use projects. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. CalEEMod was used to analyze project impacts.

Utilizing information provided by the project manager, Table III-4 was developed and provides the construction activity modeled for the project.

**Table III-4
CONSTRUCTION ACTIVITY EQUIPMENT AND DURATIONS YEAR 2021
19.1 ACRES**

| Phase Name and Duration | Round Trips per Day | Equipment |
|--|--------------------------------------|-------------------|
| Clear and Prep 3 months | 10 Employees | 1 Scrapper |
| | | 2 Loader/Backhoes |
| | | 2 Dozers |
| Grading and Compacting 4 months | 10 Employees 10 Vendor Deliveries | 2 Scrapers |
| | | 2 Forklifts |
| | | 2 Compactors |
| | | 1 Grader |
| | | 1 Loader/Backhoes |
| | | 1 Water Truck |
| Concrete Pads, Fencing, Utilities 3 months | 10 Employees 2 Vendor Deliveries | 2 Forklifts |
| | | 2 Loader/Backhoes |
| | | 2 Rollers |
| | | 1 Concrete Mixer |

Utilizing this indicated equipment fleet shown in Table III-4 the following worst-case daily construction emissions are calculated by CalEEMod and are listed in Table III-5 as compared to the MDAQMD thresholds. Maximum annual project-related air pollution emissions relative to the yearly MDAQMD thresholds are shown in Table III-6.

**Table III-5
DAILY EMISSIONS (LBS/DAY)**

| Maximal Construction Emissions | ROG | NOx | CO | SO ₂ | PM-10 | PM-2.5 |
|-------------------------------------|-----------|-----------|-----------|-----------------|-----------|-----------|
| 2021 | | | | | | |
| Peak Daily Project Emissions | 2.5 | 27.8 | 18.8 | 0.1 | 20.3 | 11.6 |
| MDAQMD Thresholds | 137 | 137 | 548 | 137 | 82 | 82 |
| <i>Exceeds Thresholds?</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> |

**Table III-6
ANNUAL EMISSIONS (TONS/YEAR)**

| Maximal Construction Emissions | ROG | NOx | CO | SO ₂ | PM-10 | PM-2.5 |
|--------------------------------|-----------|-----------|-----------|-----------------|-----------|-----------|
| 2021 | | | | | | |
| Annual Project Emission | 0.2 | 2.2 | 1.6 | 0.0 | 1.0 | 0.6 |
| MDAQMD Thresholds | 25 | 25 | 100 | 25 | 15 | 15 |
| <i>Exceeds Thresholds?</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> |

Maximum project-related air pollution emissions were compared to daily and annual MDAQMD thresholds. Maximum daily and annual emissions are less than significant. With the enhanced dust control mitigation measures listed below, construction activity air pollution emissions are not expected to exceed MDAQMD CEQA thresholds for any pollutant even if the phases are under simultaneous

construction. Regardless, the PM-10 non-attainment status of the Mojave Desert area requires that Best Available Control Measures be used as required by the MDAQMD Rule 403. Therefore, the following mitigation measure shall be implemented.

AIR-1 Fugitive Dust Control. The following measures shall be incorporated into project plans and specifications for implementation during construction:

- **Apply soil stabilizers to inactive areas.**
- **Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.**
- **Stabilize previously disturbed areas if subsequent construction is delayed.**
- **Apply water to disturbed surfaces and haul roads 3 times/day.**
- **Replace ground cover in disturbed areas quickly.**
- **Reduce speeds on unpaved roads to less than 15 mph.**
- **Trenches shall be left exposed for as short a time as possible.**
- **Identify proper compaction for backfilled soils in construction specifications.**

This measure shall be implemented during construction, and shall be included in the construction contract as a contract specification.

AIR-2 The following signage shall be erected no later than the commencement of construction, and shall be included in the construction contract as a contract specification: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:

***“[Site Name] {four-inch text}
[Project Name/Project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text}
The MDAQMD at 1-800-635-4617 {three-inch text}”***

Operational Emissions

The project does not propose to construct any new buildings. The facility throughput permit is not being changed as a result of this project. The project will not create any additional car or truck trips. There are no operational impacts associated with this project, beyond the additional dust generated by the expanded area of operation. VVWRA operations will be mitigated per the terms identified in the existing lease agreement between the VVWRA and American Organics. The VVRCF Expansion will require the installation of a 20-foot dust control screen/berm on VVWRA property to minimize dust migration. Additionally, the following mitigation measures shall be implemented to minimize operational dust emissions:

AIR-3 During project operations a water truck shall be available on-site at all times for dust control.

AIR-4 Additional wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting, where required by VVWRA.

AIR-5 All material transported off-site with dust blow off potential shall be sufficiently watered or securely covered in a manner that prevent dust from being generated.

With the implementation of the above mitigation measures, dust control prevention for the VVRCF Expansion project will be effective. Mitigation measures **AIR-1** through **AIR-5** address fugitive dust. Fugitive dust contributes to particulate matter emissions. With the enhanced dust control mitigation measures listed above, construction and operational air pollution emissions are not expected to exceed MDAQMD CEQA thresholds for any pollutant even if the phases are under simultaneous construction. Regardless, the PM-10 non-attainment status of the Mojave Desert area requires use of Best Available Control Measures, as required by the MDAQMD Rule 403, which have been included as enforceable mitigation in the measures listed above.

Conclusion

Based on the data presented above, neither construction nor operational emissions would result in exceedance of significance thresholds for any criteria pollutants. With the mitigation provided above, emissions impacts have been minimized to the greatest extent feasible resulting in a less than significant impact.

- c. *Less Than Significant With Mitigation Incorporated* – The proposed project would generate minimal construction and operation related emissions. The proposed project would not emit hazardous or toxic emissions that would create an excess cancer risk of more than 10 in one million or a non-cancerous health index of more than 1.0. Due to the rural location of this project, there are no medical facilities or sensitive receptors in close proximity. The closest residence to the project is more than one mile away from the proposed project site. With the implementation of mitigation measures **AIR-1** through **AIR-5** outlined under issue III(b), implementation of the proposed VVRCF Expansion is anticipated to have a less than significant potential to expose sensitive receptors to substantial pollutant concentrations.
- d. *Less Than Significant With Mitigation Incorporated* – The project site is located more than one mile from the nearest sensitive receptor. Because the volume of the materials that the VVRCF will process will remain unchanged, the organic odor from the project will remain effectively unchanged. Additionally, the existing reclamation plant already exhibits the clean organic odor associated with a properly operated treatment system. Therefore, because of the distance from sensitive receptors, the existing environment at the VVRCF, and the proximity to the reclamation plant, the expanded VVRCF operations will not cause a significant odor impact. However, in order to ensure that the Facility continues to operate properly without significant odor impacts, the following mitigation will be implemented:

AIR-6 The VVRCF will continue to maintain a twenty-four hour messaging system with emergency contact list and phone numbers listed. Within 24 hours of receipt of any complaint, American Organics shall contact the person registering the complaint and provide that person with information regarding the actions being taken to eliminate or control the odor and when the odor will be eliminated or reduced below the odor significance thresholds.

Furthermore, the proposed project would include several mitigation measures and design features to minimize dust related to construction and operation of the VVRCF. Therefore, with implementation of the above mitigation, as well as mitigation measures **AIR-1** through **AIR-5**, the Project's potential to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people is considered less than significant.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|--|-----------------------------------|---|-------------------------------------|-------------------------------------|
| IV. BIOLOGICAL RESOURCES: Would the project: | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION: The following information is provided based on a study titled “*Biological Resource Assessment & Jurisdictional Delineation for the American Organics Project*” (BRA) prepared by Jacobs Engineering Group, Inc. dated November 2020 and provided as Appendix 2.

General Site Conditions

The Project Area is in the western portion of the Mojave Desert, along the west side of the Mojave River. The region is characterized by broad alluvial fans, old dissected terraces, playas, and scattered mountains. The Victor Valley communities occur on the broad surface of one of numerous coalescing alluvial fans and terraces, known as the Victorville Fan. The topography of the Project Area ranges from relatively flat on the eastern side to hilly on the western side. Elevation within the proposed Project Area ranges from approximately 2,600 feet above mean sea level (amsl) near the eastern Project boundary, to 2,670 feet amsl near the western boundary.

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

Habitat within the undeveloped portions of the Project Area include *Atriplex canescens* Shrubland Alliance (fourwing saltbush scrub), *Larrea tridentata* Shrubland Alliance (creosote bush scrub), *Baccharis emoryi* –

Baccharis sergiloides Shrubland Alliance (Emory's and broom baccharis scrub), *Populus fremontii* – *Fraxinus velutina* – *Salix gooddingii* Forest and Woodland Alliance (Fremont cottonwood forest and woodland), and *Tamarix* spp. Shrubland Semi-Natural Alliance (tamarisk thickets).

Conclusion

Sensitive Biological Resources

A BRA survey was conducted by Jacobs in October 2020 to identify potential habitat for special status plants and wildlife within the project area. No State and/or federally listed threatened or endangered species or other special status species were observed within the project area during survey and none are expected to occur. The proposed project is within an already disturbed environment surrounded by existing VVWRA wastewater treatment facilities to the north and west and existing VVRCF composting facilities to the south, adjacent the Mojave River floodplain to the east. Some of the desert scrub habitat within the western half (west of Shay Road) of the Project site is marginally suitable for several special status species, including desert tortoise and BUOW, and there is some suitable habitat adjacent the project site to the east for several special status riparian obligate bird species.

Desert tortoise

Although the disturbed four-wing saltbush scrub and creosote bush scrub habitat within the western half of the project area is marginally suitable for the federally listed as endangered Mojave desert tortoise, a protocol-level desert tortoise survey was conducted within the project area by Jacobs biologists in October 2020 and the result of the survey was negative for this species. No desert tortoise individuals or sign including desert tortoise burrows, scat, carcasses or other sign were observed during survey and Mojave desert tortoise are considered absent from the project area at the time of survey. Although the project is not likely to adversely affect this species, there is still a low potential for this species to occur in the project area and the following precautionary avoidance measures are recommended to ensure the project does not result in any impacts to Mojave desert tortoise:

- A qualified biologist shall develop a Worker Environmental Awareness Program (WEAP) that would include information on general and special status species within the Project Area, identification of these species and their habitats, techniques being implemented during construction to avoid impacts to species, consequences of killing or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species. All construction crews, foremen, and other Project personnel potentially working on site should attend this education program prior to the first day of work.
- Preconstruction surveys for desert tortoise should be conducted no more than 14 days prior to new ground disturbance within each phase of development to verify that Mojave desert tortoise remain absent from the Project Area.
- A qualified biological monitor should be present during all ground disturbing activities (clearing, grubbing and grading) to ensure that construction related activities do not impact any sensitive wildlife that may wander onto the site during construction.

Mohave Ground Squirrel

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

Burrowing Owl

A Burrowing owl (BUOW) habitat suitability assessment was conducted by Jacobs biologists in October 2020 that included 100 percent visual coverage of the Project site, wherever potentially suitable desert tortoise habitat was present, including an approximately 500-foot buffer area around the Project site. The result of the survey was that no evidence of BUOW was found in the survey area. No BUOW individuals or sign including castings, feathers or whitewash were observed and BUOW are considered absent from

the Project Area at the time of survey. Although the Project is not likely to adversely affect this species, there is still a low potential for this species to occur in the project area and the following precautionary avoidance measures are recommended to ensure the project does not result in any impacts to BUOW:

- BUOW would be included as one of the species covered in the WEAP that all construction crews, foremen, and other project personnel potentially working on site should attend prior to the first day of work.
- Preconstruction surveys for BUOW should be conducted no more than 14 days prior to new ground disturbance within each phase of development to verify that BUOW remain absent from the project area.

Nesting Birds

There is habitat within the Project Area that is suitable to support nesting birds, including adjacent habitat potentially suitable to support SWFL and LBVI. Most native bird species are protected from unlawful take by the MBTA (Appendix A). In December 2017, the Department of the Interior (DOI) issued a memorandum concluding that the MBTA's prohibitions on take apply "[...] only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs" (DOI 2017). Then in April 2018, the USFWS issued a guidance memorandum that further clarified that the take of migratory birds or their active nests (i.e., with eggs or young) that is incidental to, and not the purpose of, an otherwise lawful activity does not constitute a violation of the MBTA (USFWS 2018).

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

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

Jurisdictional Waters

Drainage B and Drainage C, as well the two small patches of Emory's and broom baccharis scrub near the northeast corner of the Project site, are subject to regulation by the CDFW under Section 1602 of the FGC and by the RWQCB under the Porter Cologne Water Quality Control Act. However, the proposed Project has been designed to completely avoid impacting these features, including any wetland/riparian habitat, and the Project design incorporates a 25-foot set-back from all jurisdictional features (Figure 5 in Appendix 2, the BRA). Therefore, no "Waters of the State" permitting will be required for Drainage B, Drainage C, or any of the riparian scrub habitat located near the northeast corner of the Project site.

Drainage A is an ephemeral stream that is also subject to the FGC and the Porter Cologne Water Quality Control Act under the jurisdictions of the CDFW and RWQCB, respectively. Therefore, any proposed permanent or temporary impacts to this feature would require a "Lake or Streambed Alteration Agreement" from the CDFW, as well as a permit from the RWQCB for "Discharges of Dredged or Fill Material to Waters of the State".

The project design will include a swale that will parallel the east side of Shay Road for site drainage. This swale will channel onsite runoff to the north end of the Project Area to drain into Drainage A just east of where Shay Road crosses Drainage A (refer to Figure 1 contained in Appendix 2, the BRA).

FGC Section 1602 Lake or Streambed Alteration Agreement

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

The project design will include a swale that will parallel the east side of Shay Road for site drainage. This swale will channel onsite runoff to the north end of the project area to drain into Drainage A just east of where Shay Road crosses Drainage A (Figure 1). The project will likely impact CDFW jurisdictional ephemeral stream, where the proposed drainage swale would connect to Drainage A. Therefore, the Project would require a Section 1602 LSA Agreement.

Regional Water Quality Control Board Permitting

The project area is within the jurisdiction of the Lahontan RWQCB (Regional Board 6V). The RWQCB regulates impacts to Waters of the State of California under the Porter Cologne Water Quality Control Act through issuance of a Construction General Permit, State General Waste Discharge Order, or Waste Discharge Requirements, depending upon the level of impact and the waterway. Project-related impacts to Drainage A would require a RWQCB permit and the Project Proponent would be required to submit an application for Discharges of Dredged or Fill Material to Waters of the State to the Lahontan RWQCB prior to commencement of any project-related activities that may impact Drainage A, or any other Waters of the State. In addition to the formal application materials and fee (based on area of impact), a copy of the appropriate CEQA documentation must be included with the application.

Impact Analysis

- a. *Less Than Significant With Mitigation Incorporated* – Implementation of the project has a potential for a significant adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. The project site is vacant, though as stated above, it been used as an illegal trash dump site. The Biological Resources Assessment (BRA) provided as Appendix 2 to this Initial Study determined that, Of the 11 State and/or federally listed or Candidate species identified by the database queries as potentially occurring within the region, only the following four State and/or federally listed species have been documented in the Project vicinity (within approximately 3 miles): Mojave desert tortoise (*Gopherus agassizii*), least Bell's vireo (*Vireo bellii pusillus*), and Mohave ground squirrel (*Xerospermophilus mohavensis*). Additionally, while the State and federally listed as endangered southwestern willow flycatcher (*Empidonax traillii extimus*) has not been documented in the project vicinity, potential for this species to occur within the project site was analyzed because there is USFWS designated Critical Habitat for this species near the Project site. Burrowing owl (*Athene cunicularia*) is a CDFW species of special concern (SSC) and is considered particularly sensitive species within the region; as such potential for this species to occur within the project site was analyzed.

As stated above under *Conclusions*, there is still a low potential for Mojave desert tortoise to occur in the project area and the following precautionary avoidance measures are recommended to ensure the project does not result in any impacts to Mojave desert tortoise:

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

This briefing shall include provisions of any requirements required for the project. The contractor shall implement Worker Environmental Awareness Program (WEAP) training on the first day of work and periodically throughout construction as needed.

- BIO-2** *Preconstruction surveys for Desert Tortoise shall be conducted no more than 14 days prior to new ground disturbance within each phase of development to verify that Mojave desert tortoise remain absent from the Project Area.*
- BIO-3** *A biological monitor shall be present during the initial ground disturbing activities (clearing, grubbing and initial grading) to ensure no sensitive resources wander onto the site and to ensure no impacts will result during construction.*

The Mohave ground squirrel is not likely to occur within the project area and the project is not likely to adversely affect this species and no additional avoidance, minimization or mitigation measures beyond those to those already recommended for Mojave desert tortoise (above) are required. Given the presence of the ongoing disturbances associated with daily operations of the existing VVRCF facility, the BRA determined that least Bell's vireo are not likely to occur within the project area and the project is not likely to adversely affect this species. As stated above, although the project is not likely to adversely affect BUOW, there is still a low potential for this species to occur in the project area and the following precautionary avoidance measures are recommended to ensure the project does not result in any impacts to BUOW:

- BIO-4** *Preconstruction presence/absence surveys for burrowing owl shall be conducted no less than 14 days prior to any onsite ground disturbing activity by a qualified biologist. The burrowing owl surveys shall be conducted pursuant to the recommendations and guidelines established by the California Department of Fish and Wildlife in the "California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation." In the event this species is not identified within the Project limits, no further mitigation is required, and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to commencement of Project activities. If during the preconstruction survey, the burrowing owl is found to occupy the site, Mitigation Measure BIO-2 shall be required.*

- BIO-5** *If burrowing owls are identified during the survey period, VVRWA and/or the Applicant shall take the following actions to offset impacts prior to ground disturbance:*

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

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

If relocation of the owls is approved for the site by CDFW, CDFW shall require VVRWA and/or the Applicant to hire a qualified biologist to prepare a plan for relocating the owls to a suitable site and conduct an impact assessment. A qualified biologist shall prepare and submit a passive relocation program in

accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) to the CDFW for review/approval prior to the commencement of disturbance activities onsite.

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

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

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

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

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

BIO-6 *Burrowing owl shall be included as one of the species covered in the WEAP that all construction crews, foremen, and other project personnel potentially working on site shall attend prior to the first day of work.*

No other species have been identified as having a potential to exist within or be impacted by the proposed project. With implementation of the above mitigation, there is a less than significant potential for implementation of this project to have a significant adverse effect, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

- b. ***Less Than Significant With Mitigation Incorporated*** – Implementation of the proposed project has a potential to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Though the project footprint contains suitable habitat for several sensitive species, it does not contain any known riparian habitat or any other sensitive natural community identified by any agency. Habitat within the western

half of the proposed Project Area (west of Shay Road) consists of a sparse covering of mixed four-wing saltbush scrub/creosote bush scrub and graded bare ground. Habitat within the eastern half of the proposed Project Area (east of Shay Road) consists primarily of a dense covering of four-wing saltbush scrub, with some graded bare ground near the northern portion of the site, east of Shay Road. Additionally, there are two small patches of Emory's and broom baccharis scrub near the northeast corner of the Project site and two drainage features that support some freshwater emergent wetland habitat surrounded by non-native tamarisk thicket near the eastern boundary of the Project site. Habitat within the adjacent Mojave River floodplain and tributary drainages to the east is dominated by Fremont cottonwood forest and woodland. The Project site is bordered on the north by unvegetated sandy river wash. Though jurisdictional features are located within the project area, the no impacts to any jurisdictional features from the proposed project will occur. As such, there is a less than significant potential for implementation of this project to have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

- c. *Less Than Significant With Mitigation Incorporated* – Please refer to the discussion under IV(b), above. According to the data gathered by Jacobs in Appendix 2, Drainage B and Drainage C, as well the two small patches of Emory's and broom baccharis scrub near the northeast corner of the Project site, are subject to regulation by the CDFW under Section 1602 of the FGC and by the RWQCB under the Porter Cologne Water Quality Control Act. However, the proposed Project has been designed to completely avoid impacting these features, including any wetland/riparian habitat, and the Project design incorporates a 25-foot set-back from all jurisdictional features. Therefore, through avoidance of any wetland and riparian habitat in the project vicinity, implementation of the proposed project will have no potential to impact any federally protected wetlands through direct removal, filling, hydrological interruption, or other means. As such, the proposed project would have a less than significant potential to have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d. *Less Than Significant With Mitigation Incorporated* – Based on the field survey of the project site, the project will not substantially interfere with the movement of any native resident or migratory species or with established native or migratory wildlife corridors, or impede the use of native nursery sites. However, the State does protect all migratory and nesting native birds. No impacts to nesting or migratory birds have been identified in Appendix 2, with the exception evidence of suitable BUOW habitat for which mitigation measure **BIO-4** through **BIO-6** have been identified to reduce impacts to a level of less than significant. Thus, the project area may include locations that function as nesting locations for native birds. To prevent interfering with native bird nesting, the following mitigation measure shall be implemented.

BIO-7 *Nesting bird surveys shall be conducted by a qualified avian biologist no more than three (3) days prior to vegetation clearing or ground disturbance activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the preconstruction nesting bird surveys, a Nesting Bird Plan (NBP) shall be prepared and implemented by the qualified avian biologist. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, individual/pair's behavior, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. To avoid impacts to nesting birds, any grubbing or vegetation removal should occur outside peak breeding season (typically February 1 through September 1).*

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

- e. *Less Than Significant Impact* – Development of the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources. Impacts to biological resources have been addressed above under issues IV(a-d). Therefore, the potential for the project to conflict with local policies or ordinances pertaining to biological resources would be considered less than significant.
- f. *No Impact* – Please refer to the discussion under response IV(a) above. The project has not been identified as being located within an area within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and implementation of the project will therefore not result in a significant impact to any such plans. No further mitigation is necessary.

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

SUBSTANTIATION: A cultural resources report has been prepared to evaluate the potential for cultural resources to occur within the project area of potential effect titled "Phase I Cultural Resources Survey and Extended Phase I Archaeological Testing: American Organics Victor Valley Regional Composting Facility Expansion Project, City of Victorville, San Bernardino County, California" prepared by CRM TECH dated May 31, 2021 (Appendix 3). The following summary information has been abstracted from this report. It provides an overview and findings regarding the cultural resources found within the project area.

Summary of Cultural Resources Onsite

CRM TECH conducted a historical/archaeological resources records search, pursued historical background research, contacted Native American representatives, carried out a systematic field survey, performed subsurface explorations through the excavation of standard archaeological units and backhoe trenches, and completed laboratory analysis of artifacts recovered.

The records search results indicate that two archaeological sites, 36-000072 (CA-SBR-72) and 36-007154 (CA-SBR-7154H), were previously recorded as lying within or partially within the project area. Site 36-007154, a historic-period refuse scatter recorded in 1992, could not be found during the field survey and was presumed to be no longer extant. Site 36-000072, an important prehistoric site that has been formally determined eligible for the National Register of Historic Places (NRHP-E-78-4) and thereby listed in the California Register of Historical Resources, represents the remnants of a seasonally occupied Native American village dating back more than 6,000 years, where thousands of artifacts were collected during an intensive excavation program in 1978. It is commonly known as the Mojave River Footprint Site, after a group of human footprints left in hardened silty clay in an area that has since been set aside for long-term preservation, outside the current project boundaries.

After the field survey encountered additional prehistoric artifacts on the surface, CRM TECH undertook the Extended Phase I subsurface exploratory procedures to detect any cultural deposits that remained buried at the portion of Site 36-000072 within the overall project boundaries and thereby discerning areas that are positive and negative for potentially important archaeological remains. As a result, artifacts from both the Late Prehistoric Period and the Archaic Period were recovered from the site, including sacred and funerary objects such as a shell bead, an etched tablet fragment, and a human bone, indicating that important archaeological data are still present.

Since it is currently listed in the California Register of Historical Resources, Site 36-000072 clearly meets the definition of a "historical resource" under CEQA provisions. Any disturbance to the cultural deposits at the site that may diminish its value or integrity as an important source of prehistoric archaeological data, therefore, would be considered "a substantial adverse change in the significance of a historical resource" (PRC §21084.1). The results of the Extended Phase I explorations completed during this study, however, have delineated areas of higher and lower sensitivity for subsurface cultural deposits, suggesting that all

ground disturbances in the portion of the site lying within the project boundaries would not constitute a substantial adverse change in the significance of Site 36-000072.

Based on this data, and in consultation with the San Manuel Band of Mission Indians, American Organics has redesigned the proposed project to avoid the area of high archaeological sensitivity. In addition, the company has agreed to minimize as much as possible the ground-disturbing aspects of project activities before bringing in the fill material and covering the site area, and a Cultural Resources Monitoring and Treatment Plan has been developed by the San Manuel Band of Mission Indians for implementation during the earth-moving phase of the project.

Through these collaborative efforts among CRM TECH, American Organics, and the San Manuel Band of Mission Indians, potential project impact on Site 36-000072 will be avoided or reduced to levels less than significant. In light of the findings of the present study and the subsequent modifications to the project plans resulting from these findings, CRM TECH recommends to VVWRA a conclusion of that the proposed American Organics Victor Valley Regional Composting Facility Expansion Project will have *No Impact* on "historical resources," under the condition that all potentially ground-disturbing activities associated with the project be monitored by qualified archaeologists and Native American representatives in accordance with the Cultural Resources Monitoring and Treatment Plan.

Impact Analysis

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

Per the summary provided above, an assemblage of artifacts was recovered from a portion of the overall site. Site 36-000072, an important prehistoric archaeological site, was previously recorded as lying partially within the project area. In 1978, the Archaeological Research Unit (ARU) of the University of California, Riverside, pursued extensive excavations on Site 36-000072. A flex burial of a child and human footprints were found during that study, and more than 6,000 artifacts were recovered (ibid.). The footprints were recorded, the burial was removed, and the site was backfilled for protection and preservation. The 1978 study determined that the site was seasonally occupied from 900 to 1300 A.D. and from 3700 to 4190 B.C. The footprints were determined to be even older. The site was formally determined to be eligible for listing in the National Register of Historic Places by the Keeper of the National Register in 1979. As such, it is automatically listed in the California Register of Historical Resources.

Work completed by the ARU determined that Area 1, which overlaps with the project area, yielded fewer artifacts and features than the other areas and it was hypothesized to have been a peripheral part of the site. Exploratory trenching and, later, monitoring during construction for the American Organics Victor Valley Regional Composting Facility Modification Project within the existing facility, in and near the ARU's Area 1, provide additional data to support this interpretation for Area 1. Work completed by McKenna also confirmed that, as is often the case, some areas within the site contain more artifacts, features, and important information than other areas within the same site.

When American Organics proposed the current expansion project, it was agreed that it was necessary to determine what impacts the proposed expansion might have on Site 36-000072. Although most of the work to expand the existing facility would consist of bringing in fill material and covering most of Site 36-000072, preliminary earthwork for the expansion would result in ground disturbances. The limited Extended Phase I investigation performed for this site was designed to explore the subsurface of the site area and discern areas that are positive for cultural resources and areas where there are no, or fewer, cultural resources.

The Extended Phase I indicates that important data is still present in the site. Although limited in scope by design, the Extended Phase I investigation does indicate that there are areas of dense artifact concentrations, including possibly intact features. Besides artifacts that are typically associated with Late Period cultures, artifacts dating to the Archaic Period, though maybe re-used by people at the site during later times, were also recovered. Sacred and funerary objects, including a shell bead, an etched tablet fragment, and a human bone were also recovered. The information recovered attests to the importance of the site.

The investigation reported on in this document also indicates that there are areas where dense concentrations of artifacts and intact cultural features are not present or where they are more limited in number. The information from this investigation, coupled with the fact that most of the work for the proposed expansion into the site would consist of bringing in fill material and covering the area, was used to redesign the footprint of the expansion area. American Organics and the San Manuel Band of Mission Indians agreed on a plan where the area of highest cultural concern would be completely avoided (Figure V-1). Additionally, a Cultural Resources Monitoring and Treatment Plan has been developed by the Tribe to ensure the protection of cultural and Tribal resources during earthmoving operations for the expansion project. The Monitoring and Treatment Plan shall be enforced through MMs **TCR-1** through **TCR-4**, and **CUL-1** through **CUL-5**, above. As such, the following mitigation measures will ensure that impacts to any cultural materials that may be discovered during ground disturbing activities are less than significant:

- CUL-1** *An archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities within areas that have moderate-to-high potential for prehistoric cultural resources, henceforth referred to as “culturally-sensitive areas.” Ground-disturbing activities include, 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 workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.*
- CUL-2** *In the event that cultural resources are discovered during monitoring activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and shall be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.*
- CUL-3** *A Monitoring and Treatment Plan (MTP) that is reflective of the project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the Project 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. The MTP will also demarcate the areas of the Project that will be subject to archaeological and tribal monitoring (CUL-1, TCR-1).*

CUL-4 *For any resources that are uncovered that prove to be significant under the appropriate CEQA criteria, as determined by a qualified archaeologist meeting Secretary of Interior standards, mitigation of potential project impact is required. These measures may focus on the following procedures, aimed at the preservation of physical and/or archival data about a significant cultural resource that would be impacted by the project:*

- *Data recovery through further excavation at an archaeological site or a paleontological locality to collect a representative sample of the identified remains, followed by laboratory processing and analysis as well as preparation for permanent curation;*
- *Comprehensive documentation of architectural and historical data about a significant building, structure, or object using methods comparable to the appropriate level of the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER) for permanent curation at a repository or repositories that provides access to the public;*
- *Adjustments to project plans to minimize potential impact on the significance and integrity of the resource(s) in question.*

CUL-5 *The Applicant is required to contact the Project Archaeologist at least 5 business days in advance of ground-disturbing activities within culturally-sensitive areas to ascertain monitor availability. If the Applicant fails to give sufficient notice to Project Archaeologist, or if it is discovered that ground-disturbing activities occurred within culturally-sensitive areas without the presence of archaeological and tribal monitors, then the Applicant will be responsible for providing for the presence of archaeological and tribal monitors at all times for the entirety of the project area.*

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

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

CUL-6 *If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.*

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

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

SUBSTANTIATION

a&b. *Less Than Significant Impact* –The proposed Project consists the Expansion of the existing VVRCF operational area. This Expansion Project will not require substantial energy to operate in order to support operations within the proposed Expansion area at the VVRCF. The Expansion areas are anticipated to require lighting similar to that which exists within the existing VVRCF, but no additional structures will be developed that will require connection to electricity. It is not anticipated that additional equipment will be required to support the operations of the Expanded VVRCF beyond that which is currently used at the VVRCF.

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

The proposed Project will be powered by Southern California Edison (SCE) through the existing power distribution system to which the VVRCF is currently connected. SCE will be able to supply sufficient electricity. The project site will not require any connection to natural gas. However, the Facility lighting must be constructed in conformance with a variety of existing energy efficiency regulatory requirements or guidelines including:

- Compliance California Green Building Standards Code, AKA the CALGreen Code (Title 24, Part 11), which became effective on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of building through the use of building concepts encouraging sustainable construction practices.
- Compliance with diversion of construction and demolition materials from landfills.
- Compliance with AQMD Mandatory use of low-pollutant emitting finish materials.
- Compliance with AQMD Rules 431.1 and 431.2 to reduce the release of undesirable emissions.
- Compliance with diesel exhaust emissions from diesel vehicles and off-road diesel vehicle/equipment operations.
- Compliance with these regulatory requirements for operational energy use and construction energy use would not be wasteful or unnecessary use of energy.

Further, SCE is presently in compliance with State renewable energy supply requirements and SCE will supply electricity to the Project. Under the operational scenario for the proposed Project, the proposed Project will not result in wasteful, inefficient, or unnecessary energy consumption that could result in a significant adverse impact to energy issues based on compliance with the referenced laws, regulations and guidelines. No mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|-----------------------------------|---|-------------------------------------|-------------------------------------|
| VII. GEOLOGY AND SOILS: Would the project: | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

a. i. Ground Rupture

No Impact – According to the regulatory map obtained from the California Department of Conservation showing Alquist-Priolo Earthquake Fault Zones and other seismic hazards (Figure VII-1), the proposed project site is not located in an area that has been mapped as containing geologic hazards, and therefore is not located in an Alquist Priolo Earthquake Fault Zone. The nearest fault zones are about 10 miles to the North (the Helendale Fault Zone) and approximately 25 miles to the south at the San Bernardino Mountains (the San Andreas Fault Zone). As such, the project site and general area do not contain any known faults, active or inactive. Therefore, no potential exists for the proposed Project to experience any fault rupture along a delineated active fault.

ii. Strong Seismic Ground Shaking

Less Than Significant Impact – The proposed project site, as with most of southern California, is in a seismically active area, and will most likely be subject to some groundshaking during the life of the operation of the Expanded VVRCF. According to the San Bernardino County Land Use Plan General Plan Geologic Hazard Overlay map (Figure VII-2), the proposed Project is not located in close proximity to any delineated active faults. However, due to the proximity of the active San Andreas Fault, about twenty-five miles to the south, and the active Helendale Fault, about ten miles to the northeast, the project site and area can be exposed to significant ground shaking during major earthquakes on either of these regional faults. Then entirety of the proposed Expansion areas of the VVRCF operations will occur in outdoor spaces, and no new structures will be developed to support the VVRCF, which presents minimal hazards from strong seismic ground shaking to humans working at the site. Therefore, impacts associated with strong ground shaking will be less than significant without mitigation.

iii. Seismic-related Ground Failure Including Liquefaction

No Impact – The proposed Project is located within VVWRA's operational site and is adjacent to the existing VVRCF. According to the San Bernardino County General Plan, General Land Use Plan with Geologic Overlays (Figure VII-2), the Project does not contain land with any liquefaction susceptibility. Therefore, it is not anticipated that the proposed Project would be susceptible to seismic-related ground failure, including liquefaction. Furthermore, no structures are proposed as part of the VVRCF Expansion. No impacts are anticipated and no mitigation is required.

iv. Landslides

No Impact – The project area is relatively flat, though the west side contains stockpiled materials that will be transferred to the adjacent area of Expansion. the west side is located adjacent to the hill that separates the VVRCF site from the VVWRA percolation pond site to the west of the site. This area as not been delineated by the San Bernardino County General Plan, General Land Use Plan with Geologic Overlays Map (Figure VII-2) as being located in an area that is susceptible to landslides. As such, no potential events can be identified that would result in adverse effects from landslides or that would cause landslides that could expose people or structures to such an event as a result of Project implementation. No impacts are anticipated and no mitigation is required.

- b. *Less Than Significant With Mitigation Incorporated* – During construction, the project sites have potential for soil erosion. Project modification and development activities will involve substantial ground disturbance, which will expose the underlying soil to erosive forces such as wind and water. Use of best available control measures (BACMs) to control fugitive dust will fully mitigate potential erosion impacts. Potential water erosion impacts to soil include accelerated erosion and down slope deposition and increased potential for surficial sliding and slumping. Compaction of soils by heavy equipment may reduce the infiltration capacity of onsite soils thereby depriving the onsite soils of water, which increases the potential for runoff and erosion due to these impervious surfaces. During Project construction when soils are exposed, temporary soil erosion could occur, which could be exacerbated by rainfall. Project grading would be managed through the preparation and implementation of a SWPPP, and will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and the VVRCF is in operation with the new Expansion area. The following mitigation measures or equivalent best management practices (BMPs) shall be implemented to address these issues:

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

- GEO-2** *American Organics shall identify additional BMPs to ensure that the discharge of surface water does not cause erosion downstream of the discharge point. This shall be accomplished by reducing the energy of any site discharge through an artificial energy dissipater or equivalent device. If any substantial erosion or sedimentation occurs, any erosion or sedimentation damage shall be restored to pre-discharge conditions.*
- GEO-3** *All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently when fugitive dust is observed migrating from the sites within which the VVRCF Expansion areas are being constructed.*
- GEO-4** *Storm runoff facilities shall be installed within operating areas and downstream to the Mojave River channel to ensure that flows from the areas utilized for operations shall not cause or result in significant erosion or sedimentation that would violate water quality objectives for the Mojave River channel.*

Implementation of these measures will ensure that construction activities and long-term operations will not generate surface runoff that could cause significant erosion or loss of topsoil. No further mitigation is required.

- c. *Less Than Significant Impact* – Refer to the discussion under VII(a) above. Potential instability associated with slope stability and liquefaction related to the Project was determined to be negligible. The potential for shrinkage or subsidence at the site was determined to be limited as the Project is not identified by the San Bernardino County General Plan, General Land Use Plan with Geologic Overlays (Figure VII-2) as being located within a liquefaction hazard zone. Additionally, the same Geologic Overlay map does not identify any landslide potential at or around the project site. Given that the project site will be filled with has been previously developed with scattered, habitable structures, the potential for soil instability is minimal. Furthermore, the entirety of the Expansion area operations will be located outdoors or within existing structures; no new habitable structures will be constructed as part of the proposed Project. Therefore, the potential for the Project to be located on a geologic unit or soil that is unstable or for the Project to cause the soils to become unstable is considered less than significant. No mitigation is required.
- d. *No Impact* – According to the United States Department of Agriculture (USDA) Web Soil Survey Soil map prepared for the project site (Appendix 4), approximately 66 percent of the proposed project site is located on Cajon Sand, 0 to 2 percent slopes and the remaining 34 percent of the site is located on Cajon Sand, 9 to 15 percent slopes. Expansive soils are generally of a clay type soil, not a sandy soil such as the Cajon Sand series =soils that underlay the project site. Furthermore, the Project does not require the construction of any indoor structures that could be adversely impacted by expansive soils. Thus, based on the absence of clay-type soils on site, the proposed Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. No impacts are anticipated and no mitigation is required.
- e. *No Impact* – The Project does not propose any septic tanks or alternative wastewater disposal systems. Therefore, determining if the project site soils are capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater does not apply. No impacts are anticipated. No mitigation is required.
- f. *Less Than Significant With Mitigation Incorporated* – An important prehistoric archaeological site was previously recorded as lying partially within the project area, however the boundaries of this site have been well-defined, and the proposed Project intends to avoid this site entirely by limiting Expansion to outside of the boundaries of this site. Given that the proposed Project intends to minimize the potential to impact this archaeological site by avoiding the boundaries of this site, the potential for

discovering paleontological resources during development of the Project is considered minimal. However, because these resources are located beneath the surface and can only be discovered as a result of ground disturbance activities, the following measure shall be implemented:

GEO-5 *Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with VVWRA's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource. Treatment of any discovered paleontological resources shall follow the Phasing and corresponding actions identified under MM CUL-1 through CUL4 and in MMs TCR-1 through TCR-4.*

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

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

SUBSTANTIATION: The following information utilized in this section of the Initial Study was obtained from the *Air Quality and GHG Impact Analyses, American Organics Victor Valley Regional Composting Facility Expansion Project, Victorville, California* prepared by Giroux and Associates dated January 24, 2020 (Appendix 1).

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

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

Significance Thresholds

In response to the requirements of SB97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California Code of Regulations in March 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Section 15064.4 of the Code specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to "select the model or methodology it considers most appropriate."

The most common practice for transportation/combustion GHG emissions quantification is to use a computer model such as CalEEMod, as was used in the ensuing analysis.

The significance of those emissions then must be evaluated; the selection of a threshold of significance must take into consideration what level of GHG emissions would be cumulatively considerable. The guidelines are clear that they do not support a zero net emissions threshold. If the lead agency does not have enough expertise in evaluating GHG impacts, it may rely on thresholds adopted by an agency with greater expertise.

The MDAQMD has published thresholds for Greenhouse Gases emissions (CO₂e). The daily threshold is 548,000 lbs/day and the annual threshold is 100,000 metric tons (MT)/year.

Project Construction Activity GHG Emissions

The project is assumed to require less than two years for construction. During project construction, the CalEEMod2016.3.2 computer model predicts that the construction activities will generate the annual CO₂e emissions identified in Table VIII-1.

**Table VIII-1
CONSTRUCTION EMISSIONS (CO₂e)**

| Year 2021 | CO ₂ e Daily (lbs/day) | CO ₂ e Annual (MT/year) |
|------------------------|-----------------------------------|------------------------------------|
| Construction Emissions | 4,472.8 | 291.2 |
| Threshold | 548,000 | 100,000 |

CalEEMod Output provided in appendix

GHG impacts from construction are considered individually less than significant.

Project Operational Activity GHG Emissions

The proposed project will not expand existing operations within the existing VVRCF site, it will just expand the area available for the current operations to occur. Therefore, no operational GHG emissions are anticipated.

Consistency with GHG Plans, Programs and Policies

The Victorville City Council in September 2015 passed a Climate Action Plan that outlined the path to reducing greenhouse emissions by 15 percent below 2008 levels, a mark set by the state. However, the proposed expansion, with the exception minor amounts of one-time GHG emissions during construction, is considered GHG neutral. The project will not increase production or associated vehicular trips as a result of implementation. In fact, the Project should be considered GHG positive because it improves the processing of green-waste and other waste products, which in turn is anticipated to encourage more recycling.

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

SUBSTANTIATION

a&b. *Less Than Significant With Mitigation Incorporated* – The Project should not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; but it may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment during construction. During construction there may be a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people or the environment. The following mitigation measure will be incorporated into the SWPPP prepared for the Project and it can reduce such a hazard to a less than significant level.

HAZ-1 *All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the VVRCF. Prior to accepting the site as remediated,*

the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.

The proposed Project will consist of expanding the existing VVCRF site, which is a composting facility located in Victorville, California. The Expanded Facility will not change the operational scenario at the VVCRF, but the west side will be utilized for blending/processing of composted materials and as finished product storage, while Planning Area 1 will be for storage of finished product. All materials will be handled according to Federal and State regulations. The Expanded Facility is not anticipated to involve significant potential for routine transport or use of substantial volumes of hazardous materials or routine generation of hazardous wastes as the composted product is not considered hazardous once the onsite treatment has been completed. Any impacts are considered less than significant with mitigation incorporated.

- c. ***No Impact*** – The Project will not emit hazardous emissions or utilize or produce any acutely hazardous materials, substances, or waste. There are no proposed or existing schools within one-quarter mile of the Project footprint; therefore, no impacts under this issue are anticipated, and no mitigation is required.
- d. ***Less Than Significant Impact*** – The project site is located on land that is either currently in operation as a waste management facility, has been previously disturbed as a result of the VVCRF or VVWRA operations, or has been undisturbed but is located within the overall VVWRA-owned site. The Project will not be located on a site that is included on a list of hazardous materials sites. The GeoTracker records were reviewed (consistent with Government Code Section 65962.5) and no open cases of contaminated sites are located within 2,500 feet of the project site (Figure IX-1). There is one remediated case within 2,500 feet of the project site at VVWRA, but this case was closed in November of 1992 (Figure IX-2). This site has no potential to create a hazard that would affect the operations of the proposed Project. Therefore, the proposed modifications and improvements to the Facility have no potential to create a significant hazard to the population or to the environment from their implementation. No significant impacts are anticipated. No mitigation is required.
- e. ***Less Than Significant With Mitigation Incorporated*** – The project site is located within the Southern California Logistics Airport (SCLA) Land Use Plan, as the Airport is located less than a mile northwest of the project site. However, though the site is exposed to some overflights, the Facility is currently in operation and the proposed modifications to the project site will not cause any significant aircraft hazards for people residing or working in the project area than that which presently occurs under the VVCRF's current operation. Therefore, impacts under this issue are considered less than significant.

Although SCLA does not pose a significant hazard for Project operations, the compost facility does attract birds that have interfered with airport operations. American Organics met with SCLA representatives on a previous Project and agreed to certain facility and operation modifications to minimize future conflicts between the two facilities. These facility and operation measures were implemented for the previous Modification Project (discussed in the Project Description) and shall be implemented for the proposed Expansion Project area to minimize impacts related to airport operations. These facility and operation measures will be implemented as mitigation by American Organics:

HAZ-2 ***a) Material containing food waste shall be processed inside the building to remove trash and contaminants, which are transferred offsite for disposal; b) Close doors at night; and c) Initial screening and contaminant removal will be conducted inside the building. This process will separate contaminants (paper, plastic, glass, etc.) from compostable material in a controlled, protected environment.***

HAZ-3 ***Aerated Static Pile Composting Operation: a) Self-contained concrete pad with aeration system; b) Bio-layer over compost – controls odors and vectors – including birds; c) The material shall be composted for a period of time until it is no longer a***

vector attractant; d) Composting process shall be conducted on a concrete pad with mechanical induction of air, which will reduce processing time to 30 to 45 days; e) The concrete beds limit the amount of area necessary for composting material and when necessary shall be tarped as additional measure for bird control; and f) The leachate control system includes subgrade piping and storage tanks which will capture liquid from the aerated static pile composting operation.

HAZ-4 ***A lined basin shall be used to control surface water. Any standing water will be pumped directly into water trucks or storage units for re-use as dust control***

HAZ-5 ***The following operational controls shall be implemented. a) Bird Cannons – set to operate at given intervals during operating hours; b) Bird bombs and whistler pyrotechnics – used by site personnel as a supplemental control tool; and c) American Organics shall diligently pursue a depredation permit to allow direct control of birds and shall implement bird control in accordance with the depredation permit.***

These measures were deemed sufficient to control the potential conflicts between SCLA operations and the continued operation of the compost facility. No private airports are located within the vicinity of the proposed Project, and as such, none will be impacted by the proposed Project.

- f. ***Less Than Significant With Mitigation Incorporated*** – Based on a review of the City's General Plan, the proposed VVRCF Expansion Project is not located in an area affected by any emergency response or evacuation plan. The proposed project will accommodate an existing evacuation area for VVWRA in the event of an emergency at their adjacent site. Further, the proposed Project will be confined within the overall VVWRA owned site, which is fenced off from public access during non-working hours. Ingress and egress of trucks onto and out of the site will come immediately from Shay Road, with the nearest intersection being Phantom East/Shay Road to the south. Given the volume of traffic that will be crossing Shay Road within the VVWRA owned site during working hours to transfer the stockpiled material within Planning Area 1 to the west side a congestion management plan shall be implemented through mitigation identified under Section XVII, the Transportation/Traffic Section of this document. Mitigation to address any potential traffic disruption and emergency access during construction issues is included in this section. Therefore, the potential for the development of the Project to physically interfere with any adopted emergency response plans, or evacuation plans is considered a less than significant impact with mitigation incorporated. No further mitigation is required.
- g. ***No Impact*** – The proposed Project is not located in a wildland fire hazard area, and according to the San Bernardino County Land Use Plan General Plan Hazard Overlays Map (Figure IX-3). Additionally, the Project is in a rural area and is not adjacent to any urbanized areas or residences. There are no habitable structures proposed by the Project. Therefore, the proposed Project has no potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No mitigation is required.

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

SUBSTANTIATION

- a. *Less Than Significant With Mitigation Incorporated – Less Than Significant With Mitigation Incorporated* – The proposed Project is located within the planning area of the Lahontan Regional Water Quality Control Board (RWQCB). The process of expanding the operational area of the VVRCF to the Facility includes construction activities that could result in erosion and sedimentation due to future runoff from the disturbed areas within the Facility. Compliance with the following mitigation measure will control future nonpoint source pollutant discharges from the project site. Implementation of this measure in conjunction with the State Water Resources Control Board and NPDES program would reduce the impact to the issue of erosion and sedimentation to less than significant. The most critical component of the SWPPP that will be implemented is to control all runoff during construction and operation to ensure that no sediment or any pollutant discharges are released into the general environment, which includes the Mojave River to the east of the site. The following shall be implemented in conjunction with the mitigation identified in the Geology/Soil Section, Measure **GEO-4**. These measures are intended to be complementary, not incremental.

HYD-1 *The construction contractor shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will be implemented to prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving offsite. The SWPPP shall be developed with the goal of achieving a reduction in pollutants both during and following construction to control storm water runoff to the maximum extent practicable based on available, feasible best management practices.*

The following BMPs or comparable measures shall be included in the SWPPP:

- *Stockpiled material should not be stored in areas which are subject to the erosive flows of water.*
- *Measures such as the use of straw bales, sandbags, silt fencing or detention basins shall be used to capture and hold eroded material for future cleanup.*
- *Rainfall will be prevented from entering material and waste storage areas and pollution-laden surfaces.*
- *Construction-related contaminants will be prevented from leaving the site and polluting waterways.*
- *A spill prevention control and countermeasures and remediation plan shall be in place and implemented to control release of hazardous substances.*

Additionally, to address stormwater and accidental spills within this environment, any new Project must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) and a National Pollutant Discharge Elimination System (NPDES) to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to ensure that Project-related after development surface runoff meets discharge requirements over the short- and long-term. The WQMP would specify stormwater runoff permit Best Management Practices (BMPs) requirements for capturing, retaining, and treating on site stormwater once the Expansion Project has been developed. Because the project site consists of pervious surfaces, onsite drainage will generally be directed to a new retention pond located at the northeast corner of the west side or to the newly developed retention ponds that are located within the existing VVRCF. Furthermore, the Project would include mechanisms to ensure that runoff within the west side is managed and retained onsite. The SWPPP would specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential water pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. With implementation of these mandatory Plans and their BMPs, as well as mitigation measure **GEO-4**, **HAZ-1** and **HYD-1** above, the development of Expansion Project will not cause a violation of any water quality standards or waste discharge requirements.

- b. *Less Than Significant Impact* – The proposed Project will not adversely impact groundwater resources. Excavation will require small quantities of water to control fugitive dust and this can be provided from recycled water sources or at the nearest potable water outlets. In the short term, if any potable water must be used it will be such a small quantity (about 5,000 gallons per day of construction/grading) that no significant effect on the Upper Mojave River Valley Groundwater Basin will occur. The Project is located in an area where groundwater is located at an estimated 6 feet to 27 feet below the ground surface. However, a potential source of groundwater contamination is the compost operation itself. Due to the low rainfall in the project area, the potential for groundwater contamination from gradual accumulation of contaminants in the soil is considered to be less than significant. Furthermore, American Organics implemented a series of groundwater contamination measures as part of its Modification Project, which is currently being constructed. Through directing runoff to the retention basins within the VVRCF site and within the east side, which are capable of capturing all runoff from the site, the potential for discharge and subsequent percolation into the

groundwater aquifer at the project site will be controlled and reduce future potential groundwater contamination to a less than significant impact level. Ample recycled water is available from VVWRA to supply the water needs for the site, which will be minimal given that no infrastructure beyond lighting is proposed to be included within the Expansion area. The VVRCF will utilize this supply of water to minimize dust migration from the site; no other operational water supply will be required in support of the proposed Expansion Project. The proposed Project will comply with the RWQCB standards and therefore has a less than significant potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No mitigation is required.

C

- (i-iii). *Less Than Significant With Mitigation Incorporated* – As previously noted, construction of the Project would require compliance with the California State Water Resources Board General Construction Permit. Commencement of construction activities would require the implementation of an effective combination of erosion and sediment control BMPs through the development of a Storm Water Pollution Prevention Plan (SWPPP). BMP implementation would maintain soil stability and potential water quality of any storm water discharges within the project site.

During construction of the proposed Expansion to the VVRCF, surface runoff will be altered but, as stated above, any adverse impacts will be controlled by implementation of the SWPPP, which must include sufficient BMPs to meet performance standards established by mitigation measure HAZ-1, and GEO-4 above. Over the long-term, the site expansion within the Project footprint will change absorption rates, drainage patterns and may change the amount of surface runoff. The Expansion area is currently relatively pervious given that it contains native vegetation and has not been developed, while the west side contains stockpiled material. This reflects the proposed site design modifications which address long-term operational runoff from the site, i.e., comparable to a Water Quality Management Plan (WQMP). To address these issues, the following mitigation measures, in conjunction with mitigation measure **GEO-4**, will control future pollutant discharges from the project site.

HYD-2 *Runoff intercepted upstream of the Expanded Facility sites shall be captured and either diverted around the site and returned to its existing downstream channel or an alternative that does not cause damage due to erosion and sedimentation or to any wetland/riparian habitat that may be dependent on such flows. If the upstream drainage management solution increases or concentrates flows in a manner that could damage downstream areas, adequate energy dissipation devices shall be installed to ensure that no significant downstream changes affect the environment.*

HYD-3 *All flows generated on the Expanded Facility sites shall be collected within the operations areas and flows shall be released from the water quality management basins at a volume not greater than historic flows that flowed from the eastern edge of the existing VVRCF operating site. Flows released downstream of the Facility shall be designed to not cause any significant adverse impact to existing environmental resources downstream of the discharge location.*

Therefore, implementation of these measures will ensure that the changes in absorption rates and any alteration of drainage patterns do not cause any significant changes or increases in areas downstream of the sites proposed for modification. The proposed Expansion area will direct onsite runoff flow to the existing collection mechanisms designed as part of the Modification Project that is currently undergoing construction within the existing VVRCF site. Onsite drainage within the Expansion Project area will generally be directed to a new retention pond located at the northeast corner of the west side or to the newly developed retention ponds that are located within the existing VVRCF. Runoff within Planning Area 1 will be managed as it is managed presently; the removal of the stockpiled material within the Planning Area 1 will grade the site to be level with Shay Road and

no other modifications to the site are anticipated other than the storage of finished material as part of the Expanded operation of the VVRCF. This effort will require American Organics to ensure that commensurate with grading Planning Area 1, which contains the stockpiled material, drainage mechanisms are installed to ensure that on- and off-site flows are managed. As such, the following mitigation measure shall be implemented:

HYD-4 *American Organics shall grade the west side to include on-site and off-site drainage mechanisms commensurate with that which exists within this site at present.*

Thus, based on the proposed design of the Expansion of the VVRCF, the proposed Project would have a less than significant potential to result in substantial erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite; or, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. No further mitigation is required.

c. iv. Impede or redirect flood flows?

Less Than Significant Impact – As shown on the Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) #0671C5805H provided as Figure X-1, the project site is located within Zone X, which represents an area with a 0.2% annual chance storm (500-year), areas of a 1% (100-year) annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile. Furthermore, development of this site is not anticipated to redirect or impede flood flow at the project site, particularly given that surface flows on site will be directed to the onsite drainage features which will be capable of intercepting the stormwater flows from the project site or otherwise be detained on site and discharged in conformance with San Bernardino County requirements. Therefore, impacts under this issue are considered less than significant and no mitigation is required.

- d. *Less Than Significant With Mitigation Incorporated* – Please refer to response IX(c) above. The proposed Project is not located within a flood hazard, tsunami, or seiche zone. As stated above, the project site is located between VVWRA's wastewater treatment operations and American Organic's current VVRCF operations. During construction, runoff will be managed through implementation of a SWPPP and Water Quality Management Plan (WQMP), and implementation of mitigation measure **HAZ-1** and **HYD-1**, which will ensure that the risk of release of pollutants from the project site is less than significant. The Project is located more than 75 miles from the Pacific Ocean, which eliminates the potential for a tsunami to impact the project area. Additionally, a seiche would not occur within the vicinity of the Project because no lakes or enclosed bodies of water exist near the site that could be impacted by such an event. Finally, according to the San Bernardino County General Plan, General Land Use Plan with Hazard Overlays map (Figure IX-3), the proposed Project is located outside of the area of inundation to the east of the project site. As such, with the implementation of mitigation measures **HAZ-1** and **HYD-1** above, the proposed Project would have a less than significant potential to risk release of pollutants due to Project inundation.

- e. *Less Than Significant Impact* – Please refer to the discussion under issue X(b) above. The “2018 Sustainable Groundwater Management Basin Prioritization: Process and Results” document, prepared by the State of California Department of Water Resources¹, indicates that the Mojave River basin is under very low priority. As stated in the 2018 Basin Prioritization, of the 517 groundwater basins in California, 109 are prioritized as high and medium and 408 are prioritized as low and very low. The Mojave River Basin—which underlies the project site—does not have a sustainable groundwater management plan or and the Project will not interfere with the overall water quality of the basin as discussed above. Therefore, it is not anticipated that the proposed VVRCF Expansion

¹ <https://gis.water.ca.gov/app/bbat/>

Project would have a significant potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|--|-----------------------------------|---|-------------------------------------|--------------------------------|
| XI. LAND USE AND PLANNING: Would the project: | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

- a. *No Impact* – The Project will expand facilities within directly adjacent to an existing compost facility—the VVRCF—within the overall VVWRA wastewater treatment operations site. There is no development directly adjacent to the boundaries of the VVWRA operations site; as such, given that the proposed Expansion Project will occur entirely within the boundaries of the VVWRA operations site and will also form a contiguous site of operations for the VVRCF, it is not anticipated that the development of the proposed Expansion Project will physically divide an established community. No impacts under this issue are anticipated and no mitigation is required.
- b. *Less Than Significant Impact* – As stated under issue X(a) above, the proposed Project is zoned for Exclusive Agriculture use, and the land use designations are Open Space and Specific Plan (SCLA). As stated above, while the zoning classification allows agricultural use, the area within which the Expansion Project will be developed is located within VVWRA's wastewater treatment operations site, which does not support any agricultural operations beyond the composting activities that take place at the VVRCF. Additionally, according to the City of Victorville's Development Code, the proposed Facility Expansion is considered a conditionally allowable use within the Exclusive Agriculture use. Therefore, the implementation of this Project at this site will be consistent with surrounding land uses, and current use of the site. Based on this information, implementation of the proposed Expansion Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Any impacts under this issue are considered less than significant and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|-----------------------------------|---|---------------------------------|-------------------------------------|
| XII. MINERAL RESOURCES: Would the project: | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION

a&b. *No Impact* – The proposed Project will be developed within VVWRA's wastewater treatment operations site, which does not contain any known mineral resources. A review of the Victorville General Plan Resource Chapter indicates that the proposed Project is adjacent to, but not located within a mineral resource designation. The area to the east of the project site contains several cement plants, but these plants are located across the Mojave River, while the area in which the Project has not been previously mined for any mineral/aggregate resources. The project site is currently located within the VVWRA wastewater treatment operations site and is adjacent to the VVRCF operations site; neither of these uses support mining operations. No specific plan or other land use plan is in place that would delineate important mineral resources at the project site. Therefore, the development of the Project will not cause any loss of mineral resource values to the region or residents of the state, nor would it result in the loss of any locally important mineral resources within the City. No impacts would occur under these issues. No mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|---|-----------------------------------|---|-------------------------------------|--------------------------------|
| XIII. NOISE: Would the project result in: | | | | |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

Noise is generally described as unwanted sound. The proposed VVRCF Expansion Project will develop a vacant portion of the VVWRA wastewater treatment operations site to expand the existing VVRCF to create more area for windrow and static pile processing, as well as for finished material storage. The proposed Project is located adjacent to the Mojave River to the east, and to rolling hills to the west. The project site is located adjacent to the existing VVRCF operations site to the south and to the VVWRA operations site to the north and west. Farther to the west is SCLA, which is a source of background noise in the Project vicinity. Additionally, east of the Mojave River are two cement plants, which generate a significant amount of noise; however, much of the noise generated by the operations of the cement plants attenuates to a minimal level at the project site.

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

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

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

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

- a. *Less Than Significant With Mitigation Incorporated* – The background noise level at the Expansion site is dominated by operational noise generated by the existing VVRCF. Noise at the VVRCF is generated by tractors and earth moving equipment, as well as large equipment that supports turning the compost piles (i.e., processing the materials in the compost piles by moving the materials around). The Noise Element of the City of Victorville General Plan establishes noise quality standards for land use categories based on the State of California Office of Noise Control land use compatibility recommendations. The Noise Element shows the community exposure to noise recommended as normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable for various classes of land use sensitivity. The City of Victorville Land Use Compatibility Standards recommend a Community Noise Exposure of 55-70 dB CNEL for Industrial, Manufacturing, and Utility uses. The VVRCF, VVWRA and SCLA activities dominate background noise within the project area; the cement plant to the east generates a substantial amount of noise, but that noise attenuates before it reaches the project site.

Short-Term Noise

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

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

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

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

However, the topography of the area (a hill separates the waste management facility site and the nearest residences to the south) and the vegetation in the riparian area of the Mojave River channel attenuate sound from construction at a rate of six or seven decibels per doubling of distance. Therefore, over a half mile distance—which is the distance from the Expansion site to the nearest sensitive receptor—noise generated by construction equipment will be attenuated by about 35 dB, which would be well within the City and County Noise thresholds for rural residential uses. The short-term noise impacts associated with Project construction activities are forecast to be less than significant through compliance with the City Municipal Code and by implementing the following measures. As construction activities may be a nuisance to nearby residents, the following mitigation shall be implemented:

- NOI-1 VVWRA shall require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.***
- NOI-2 Equipment not in use for five minutes shall be shut off.***
- NOI-3 Equipment shall be maintained and operated such that loads are secured from rattling or banging.***
- NOI-4 Where commercially available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.***
- NOI-5 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment. This measure shall be included in the construction contract as a contract specification by the contractor.***
- NOI-6 No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.***
- NOI-7 Construction shall be limited to the hours of 7 AM and 6 PM Monday through Friday, 8 AM and 5 PM Saturday, and shall not be allowed on Sundays or any Federal Holiday unless an emergency warrants the continuation of construction outside of the aforementioned hours.***

Thus, based on the existing noise circumstances within the vicinity of the Project (i.e. from the Airport and from VVRCF and VVWRA operational noise adjacent to the project site), short-term noise impacts are considered less than significant with the implementation of the mitigation measures above.

Long-Term Noise

The long term or permanent change in noise will consist of the addition of heavy equipment movement within the Expansion site that would be comparable to the activities that currently take place at the VVRCF. The proposed Project is not anticipated to change the volume of material accepted at the VVRCF because American Organics does not propose to modify its permit. As such, no additional operations related trips are anticipated to occur as a result of implementation of the proposed Expansion Project. Operations of the VVRCF, once it has been expanded as proposed by this Project, will not generate noise in excess of that which occurs from current VVRCF operations. Given that there are no noise generating sources within the Expansion site at present, the expansion of the VVRCF operations into this vacant area will create a noise source at this site greater than that which exists at present. However, the noise generated within the boundaries of the existing VVRCF will be minimized to the extent that, by expanding the area of operations and not increasing the

operational activities, noise generated by the Expanded VVRCF will be approximately equal to the existing noise levels, but spread out over a greater area, thus dispersing the noise generation from the site. Given the lack of sensitive receptors in the vicinity of the project site, the noise generated in the long term from the operations of the expanded VVRCF would be less than significant. Furthermore, activities that would occur within the existing and expanded VVRCF must comply with the Municipal Code, and as such must comply with the City's noise standards. Through compliance with the City's Municipal Code, and because of the great distance between the project site and the nearest sensitive receptor, the Project will have a less than significant potential to create a substantial permanent increase in ambient noise levels in the vicinity of a Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. No mitigation measure to minimize long term noise impacts are required.

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

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

The topography of the project area—a hill separates the waste management facility site and the nearest residences to the south, the distance from any nearby sensitive receptors, and the vegetation coverage found adjacent to the project site in the riparian area of the Mojave River channel contribute to the attenuation of vibration. Given the above, it is not anticipated that vibration will be detectable at the nearest sensitive receptors to the project site during construction or operation of the expanded VVRCF. Therefore, the proposed Project will have a less than significant potential to generate excessive groundborne vibration or groundborne noise. No mitigation is required.

- c. *Less Than Significant Impact* – No private airports are located in the vicinity of the Project. The project site is located within the Southern California Logistics Airport Land Use Plan area, as the Airport is located less than a mile east of the project site. The VVRCF proposed for expansion currently operates within the SCLA Land Use Planning Area, and the expansion of the area within which the VVRCF will operate will not create a noise environment that differs from that which presently exists under American Organics' current operation. Furthermore, according to the City of Victorville General Plan Existing Noise Contour map for SCLA (Figure XIII-1), the entirety of the VVRCF including the proposed area of expansion is located outside of the SCLA noise contours. However, the City of Victorville General Plan 2025 Noise Contour map for SCLA indicates that portions of the VVRCF are located within the Long Range CNEL Contour with Marginal Effect. As such, though the proposed Expansion Project is located within a future noise contour for SCLA, the

noise contour indicates that the impact on sites within this area will be marginal. Therefore, the Project has a less than significant potential to expose people residing or working in the project area to excessive noise levels. No mitigation is required.

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

SUBSTANTIATION

- a. *Less Than Significant Impact* – The proposed VVRCF Expansion Project is not anticipated to employ additional persons in support of the expanded area of operation; however, the Project would require a temporary construction work force of approximately 20 persons. It is unknown whether the new employees will be drawn from the general area or will bring new residents to the project area. According to the Southern California Association of Governments (SCAG), the total population within Victorville was 123,701 persons in 2018². According to the SCAG 2016 RTP SCS Demographics and Growth Forecast, the population within the City of Victorville is anticipated to grow to 184,500 persons³. Therefore, the proposed Project would create a potential for 20 more temporary opportunities for employment during construction, which is only an increase in population of 0.0162% if each of the 20 temporary employees are new residents to Victorville for the duration of the construction of the proposed Expansion Project. Given that the City General Plan indicates that the planned population is anticipated to grow by about 61,000 persons beyond the 2016 population, the potential increase in residents is well within the planned population growth within unincorporated San Bernardino County. Thus, based on the type of Project and the small, temporary increment of potential population the population generation associated with Project implementation, the proposed Project will not induce substantial population growth that exceeds either local or regional projections.
- b. *No Impact* – No occupied residences are located on the project site; therefore, implementation of the proposed Project will not displace substantial numbers of existing housing or persons, necessitating the construction of replacement housing elsewhere. No impacts will occur; therefore, no mitigation is required.

² https://scag.ca.gov/sites/main/files/file-attachments/victorville_localprofile.pdf?1606014820

³ <https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557>

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

SUBSTANTIATION

- a. *Less Than Significant Impact* – The nearest fire station serving the Project is approximately one mile away from the project site, located at the Southern California Logistics Airport. The City is served by the Victorville Fire Department, and the SCLA fire station is Station #319, located at 18550 Readiness Street, Victorville, CA 92394. The Victorville Fire Department (SBCFD) provides fire protection and emergency medical services for the City. The VVRCF has some potential for random fire events during operations, but the VVRCF is served by large equipment that is available to combat a fire that ignites in compost materials. The staff would use this equipment to spread any burning material and apply water to put out the fire. It would take approximately 5 minutes for Victorville Fire Department to reach the site from Station #319. Based on the above information, the proposed Project does not pose a significant fire hazard, nor is the proposed Project forecast to cause a significant demand for fire protection services. The Project does not propose any new structures, but standard conditions will be imposed by the City and the Fire Department to ensure adequate fire flow at the expanded VVRCF. These requirements are considered adequate measures to prevent any significant impacts under this issue, thus no mitigation is required.
- b. *Less Than Significant Impact* – The City receives police services through the San Bernardino County Sheriff Department. The Victorville Police Department is responsible for providing public safety to a geographical area of approximately 74 square miles with a population of approximately 115,000 residents. The Department enforces local, state, and federal laws; performs investigations and makes arrests; administers emergency medical treatment; and responds to City emergencies. The sheriff station is located at 14200 Amargosa Road, Victorville, CA 92392. The proposed Project will not include the kind of uses or activities that would likely attract criminal activity, except for random trespass and theft; however, any random trespass is unlikely given that the VVRCF is fenced within a second fenced area operated and owned by VVWRA, which controls site access and the type of activities at the site do not typically attract criminal activities. Therefore, implementation of the proposed Project would not substantially increase the demand for law enforcement services beyond that already existing at the Expansion site.
- c. *Less Than Significant Impact* – The proposed Project is not anticipated to generate any new long-term jobs, nor attract new residents to the area, as such the Project is not anticipated to generate any new direct demand for the area schools. The project area is served by several school districts including the following: Victorville Elementary School District, Victor Valley Union High School District,

and the Adelanto School District. The State of California requires a portion of the cost of construction of public schools to be paid through a fee collected on residential, commercial, and industrial developments. The development impact fee mitigation program of the area School Districts adequately provides for mitigating the impacts of the proposed Project in accordance with current state law. No other mitigation is identified or needed. Since this is a mandatory requirement, no mitigation measures are required to reduce school impacts of the proposed Project to a less than significant level.

- d. *Less Than Significant Impact* – The proposed Project will not directly add to the existing demand on local recreational facilities. The proposed Project is not anticipated to generate any new long-term jobs, nor attract new residents to the area, as such the Project is not anticipated to generate any new direct demand for parks within the City, as Project would have a minimal potential to induce substantial population growth within the City. The provision of parks within the City is provided through Park Development Impact Fees (DIF) on new development. Additionally, the Project will contribute property and sales taxes to the general fund to offset the minimal potential for increased demand for park and recreation services within the City that may result from implementation of the proposed Project. Thus, the proposed Project will have a less than significant impact to parks and recreation facilities.
- e. *Less Than Significant Impact* – Other public facilities include library and general municipal services. Since the Project will not directly induce substantial population growth, it is not forecast that the use of such facilities will substantially increase as a result of the proposed Project. The Project will continue to contribute to the City's General Fund through payment of property and sales tax, which is considered sufficient to offset any impacts to other public facilities as a result of implementing the Project. Thus, any impacts under this issue are considered less than significant, and no mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|--|-----------------------------------|---|-------------------------------------|-------------------------------------|
| XVI. RECREATION: | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SUBSTANTIATION

- a. *Less Than Significant Impact* – As addressed in the discussion under XIII and XVI(d) above, the proposed Project does not include a use that would substantially induce population growth. As stated in the discussion under Population and Housing, the Project would create approximately 20 temporary jobs during construction, while no permanent workforce is anticipated to be required to support the VVRCF Expansion Project. It is unknown what portion of the temporary workforce will be new residents. The proposed Project will contribute to the City's General Fund through payment of property and sales tax. Given that the proposed VVRCF Expansion Project would not induce substantial population growth, and the availability of open space for recreational use in the surrounding area, the Project is not anticipated to result in a substantial increase in the use of existing park and recreation facilities. Therefore, any impacts under this issue are considered less than significant. No mitigation is required.
- b. *No Impact* – The Expansion site is currently vacation and does not include any recreational facilities. The proposed VVRCF Expansion Project will be developed within VVWRA's operations site, and will form a contiguous parcel that will include the existing VVRCF and the adjacent Expansion areas. No recreational facilities are proposed or required by the Project and therefore, the proposed Project is not anticipated to cause an adverse physical effect on the environment as a result of construction or expansion of recreational facilities.

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

SUBSTANTIATION

- a. *Less Than Significant Impact* – The proposed Project is located at the terminus of Shay Road in the City of Victorville. According to the City of Victorville General Plan 2030, Shay Road acts as a Collector Road, which is a street that provides circulation within a defined geographic area and connects this area to intra-city traffic routes. It is not part of an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system or an applicable congestion management program. Shay Road primarily serves as an access road for a few residences, VVWRA's wastewater treatment plant operations, and the existing VVRCF operations. The Project will generate construction traffic, which is temporary; during construction, the Project is anticipated to generate about 50 roundtrips per day, which will be spread throughout the day during construction. The Project will involve a maximum of 200 trips per day from Planning Area 1 on the west side of Shay Road to transport the stockpiled material to the west side on the east side of Shay Road; these trips will not significantly impact the circulation within the area either temporarily or permanently. Once the VVRCF expansion has been constructed, the Project is not forecast to generate a significant amount of new traffic because the capacity of the VVRCF will not be expanded as part of this Project; thus, the number of permanent round trips to and from the site is not expected to change from current conditions. Shay Road would be capable of handling 500 handling vehicles per hour and more than 8,000 vehicle trips per day and still provide an acceptable level of service (LOS) per City guidelines. Based on the limited number of additional trips accessing the project site from Shay Road, the proposed Project does not have a significant effect on the local and regional circulation system.

The operation of the VVRCF has no potential to impact alternative transportation plans, policies or programs. The Project operations in the long term will not generate significant additional traffic and no new public roads or alterations to any existing public roads will result. The project area is isolated at the terminus of an existing road (Shay Road) with no outlet and it is not served by alternative transportation. Additionally, few, if any, pedestrians or bicyclists utilize Shay Road because this roadway dead ends at the VVWRA and VVRCF site, and the Project itself does not include any activities that would pose hazards or barriers for pedestrian or bicycle use of this road. No potential exists to adversely impact any of the above alternative modes of transportation, as such, impacts under this issue are considered less than significant. No mitigation is required.

- b. *No Impact* – The City of Victorville has not yet developed a threshold for VMT. The proposed Project will expand the area of operations of the existing VVRCF; this expansion will not increase the operational capacity of the VVRCF and therefore will have no impact on vehicle miles traveled (VMT). Furthermore, during construction, many of the trips generated by the Project will be from Planning Area 1 to the west side, which will substantially minimize the distance required to obtain fill material

for the site. Therefore, given that this Project will not contribute additional trips over the long term, and will minimize the distance travelled by construction vehicles in the short term, the proposed Project will have no potential to conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No mitigation is required.

- c. *Less Than Significant With Mitigation Implemented* – Shay Road is a rural collector road that follows the local topography. It does have several curves that create short sight-distance situations and during peak traffic periods, when many vehicles are entering and exiting Shay Road for construction areas, it is recommended that a flag person be provided to control traffic at the site entrance. The following mitigation measure will be implemented:

TRAN-1 American Organics shall provide a flag person to control traffic during morning and evening peak hours to ensure that hazards are minimized for employees or customers entering or exiting the overall VVWRA site during construction of the expanded VVRCF.

Therefore, with the inclusion of a flag person to control traffic hazards, any potential increase in hazards due to design features or incompatible use will be considered less than significant in the short term. In the long term, no impacts to any hazards or incompatible uses in existing roadways are anticipated because access to the VVRCF will remain unchanged. Thus, any impacts are considered less than significant with implementation of mitigation. No additional mitigation is required.

- d. *Less Than Significant With Mitigation Incorporated* – The Project will involve a maximum of 200 trips per day from Planning Area 1 on the west side of Shay Road to transport the stockpiled material to the west side on the east side of Shay Road. As such, construction will require several trips per day across Shay Road. These trips will occur internally within the boundaries of VVWRA's wastewater treatment operations site, but may disrupt traffic to VVWRA's offices. As such, a construction traffic management plan shall be implemented to minimize conflicts along Shay Road during construction:

TRAN-2 The construction contractor will provide traffic management resources, to be determined by VVWRA. VVWRA shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. At a minimum this plan shall include how to minimize the amount of time spent on construction activities; how to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes; how to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure that traffic can flow adequately during construction; the identification of alternative routes that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities will occur; and at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.

As stated above, once the expanded VVRCF is in operation, access to the VVRCF will remain unchanged. However, the Project will include emergency access through a new opening in the fence providing restricted access to the west side, and to Planning Area 1 where finished product will be stored. No new points of public access are proposed. As such, emergency access to the site during operation will be maintained. With implementation of the above mitigation measure, the Project is not anticipated to result in inadequate emergency access. No further mitigation is required.

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

SUBSTANTIATION

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

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

a&b. *Less Than Significant With Mitigation Incorporated* – The project site is located within an area of tribal resource significance. VVWRA received notification from the San Manuel Band of Mission Indians for tribal consultation under AB-52. Because there is a significant prehistoric archaeological site located within and in close proximity to the proposed project site, the San Manuel Band of Mission Indians (SMBMI) was notified of the project and expressed interest in reviewing the Cultural Resources Report. SMBMI provided extensive comments on the Cultural Resources Report, which led to a meeting between SMBMI, CRM TECH, VVWRA and American Organics on March 25, 2021, SMBMI provided VVWRA with conditions by which the Applicant should adhere so as to avoid the sensitive areas within the original project boundaries. Since this conversation, the Applicant minimized the site to exclude the sensitive areas delineated by CRM TECH (no figure shall be provided so as to protect these areas from public disturbance). Furthermore, the Applicant moved

the area of greatest excavation to an area SMBMI agreed would not be likely to cause significant impacts to tribal cultural resources. Given the above, SMBMI requested that the following language to include in the Conditions of Approval and Mitigation Measures for the proposed project. These mitigation measures, provided below, represent the Lead Agency (VWVRA) and the Tribe (SMBMI) reaching an agreement to move forward with the project with the implementation of mitigation to protect important archeological sites that overlap with the project site. Therefore, the following mitigation measures shall be implemented to protect tribal cultural resources:

TCR-1 *Due to the presence of sensitive tribal cultural resources in the project area, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in the Monitoring and Treatment Plan (CUL-2), if any prehistoric cultural resources discovered during project implementation. The Monitoring and Treatment Plan shall allow for a tribal monitor to be present for the remainder of the Project, should SMBMI elect to place a monitor on-site. In such cases, a sufficient number of tribal monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The Lead Agency and/or Applicant shall, in good faith, consult with SMBMI throughout the life of the Project.*

TCR-2 *If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.*

If the discovery is determined to be potentially significant by any consulting party, a research design shall be developed by the archaeologist that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the Project Archaeologist/Applicant, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the archaeological significance of the resource, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource.

TCR-3 *Where avoidance and preservation in place are not possible, all tribal cultural resources discovered during archaeological testing or project implementation shall be reburied in a location decided upon by SMBMI, the Applicant, and the Lead Agency. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. All removed material shall be temporarily curated on-site in a secure location prior to reburial. Reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI.*

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

physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/Applicant to pay for those fees.

TCR-4 All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

No other Native American tribes have expressed interest in the proposed project. Therefore, with implementation of MMs **TCR-1** through **TCR-4**, as well as MMs **CUL-1** through **CUL-6** above, the project is not anticipated to cause a change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape, or object with cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe. No further mitigation is required.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|--|-----------------------------------|---|-------------------------------------|--------------------------------|
| XIX. UTILITIES AND SERVICE SYSTEMS: Would the project: | | | | |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

a. Water

No Impact – The proposed VVRCF Expansion Project is not anticipated to require connection to additional water service to operate. This area will not include any restroom facilities or structures directly connected to municipal water service. However, during both construction of the Expansion Project and operation of the Expanded VVRCF, recycled water from VVWRA is anticipated to be used to manage dust. Fugitive dust from construction activities may occur, and recycled water from the adjacent VVWRA site is available to manage dust from leaving the site. Additionally, given that the purpose of the proposed VVRCF Expansion Project is to provide additional area within which to process and store compost material, recycled water from VVWRA is anticipated to be required to manage dust migration that can occur from the composting process during operation of the VVRCF. As such, given that VVWRA has ample available supply of recycled water generated by the collection and processing of wastewater at their wastewater treatment plant, it is anticipated that the proposed Project will not require or result in the relocation or construction of new or expanded water facilities. No impacts are anticipated under this issue.

Wastewater

No Impact – The proposed VVRCF Expansion Project will not require a connection to wastewater collection services. The proposed Expansion Project will not install any new structures or restroom facilities; as such, no new or expanded wastewater treatment facilities. However, the Project may require the use of recycled water generated by the adjacent VVWRA wastewater treatment plant. The wastewater treatment plant treats about 10.7 million gallons of wastewater per day (MGD)⁴, and

⁴ https://www.vvwra.com/about_us/welcome/default.htm

recycles millions of gallons per day.⁵ VVWRA has ample available recycled water supply given that VVWRA is the primary source of wastewater treatment collection within the High Desert Cities located east of Interstate 15. As such, given that VVWRA has ample available supply of recycled water generated by the collection and processing of wastewater at their wastewater treatment plant, and that no wastewater collection will be required as part of this Project, it is anticipated that the proposed Project will not require or result in the relocation or construction of new or expanded wastewater treatment facilities. No impacts are anticipated under this issue.

Stormwater

Less Than Significant With Mitigation Incorporated – The stormwater runoff on site will be managed in accordance with the WQMP as discussed in the Hydrology and Water Quality Section (Section X) of this Initial Study. Mitigation to address stormwater management and collection was required to minimize impacts from the Project—addressed through mitigation measures **HYD-2, HYD-3, and HYD-4**. These measures will ensure that stormwater is handled properly once the Expansion Area is operational, and that no significant impacts from installing stormwater collection infrastructure concurrent with the development of the proposed Project would occur. Therefore, stormwater will be adequately managed on site and as such, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts under this issue are less than significant with the implementation of the mitigation measures identified above.

Electric Power

Less Than Significant Impact – Southern California Edison (SCE) provides electricity to the existing VVRCF and will support any electricity required to support the operations of the Expansion Area. The existing electricity infrastructure will be extended to support the VVRCF Expansion operations. No construction or relocation of electric facilities will be required to serve the Project. Therefore, development of the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded electric power facilities. Impacts are less than significant.

Natural Gas

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

Telecommunications

No Impact – Development of the VVRCF Expansion Project would not require installation of wireless internet service or phone service. Therefore, the Project would not result in a significant environmental effect related to the relocation or construction of new or expanded telecommunication facilities. No impacts are anticipated.

- b. *Less Than Significant Impact* - Please refer to the discussion under Hydrology, Section X(b) above. As stated above, the proposed VVRCF Expansion Project will not require a connection to a municipal water supply. The Expansion Area will not include any infrastructure, such as restroom facilities or other uses requiring a water connection, and as such, no impacts to any water purveyor would occur. Ample recycled water is available from VVWRA to supply the water needs for the site, which will be minimal given that no infrastructure beyond lighting is proposed to be included within the Expansion area. The VVRCF will utilize this supply of water to minimize dust migration from the site; no other operational water supply will be required in support of the proposed Expansion Project. Therefore, given that a supply of recycled water will be available for the foreseeable future, impacts under this issue are less than significant. No mitigation is required.
- c. *Less Than Significant Impact* – As stated above, the proposed Project will not require a new connection to wastewater collection services because no infrastructure will be installed within the

⁵ https://www.vvwra.com/edu_resources/rep.htm

Expansion Areas. The VVRCF is currently connected to VVWRA's wastewater collection services, and this will connection will remain in place once the Expansion Project has been developed. No wastewater collection infrastructure will be extended to the Expansion Areas as part of this Project. However, as stated above, the proposed Project will utilize recycled water from VVWRA to manage dust migration from the Expansion Area. VVWRA has ample available recycled water supply given that VVWRA is the primary source of wastewater treatment collection within the High Desert Cities located east of Interstate 15. Therefore, the proposed Project will have a less than significant demand on wastewater services. No mitigation is required.

- d-e. *Less Than Significant Impact* – The proposed Project will expand an existing solid waste facility—the VVRCF. The proposed Expansion Project will allow for the VVRCF to operate more efficiently, though without expanding the capacity of the Facility itself. It is anticipated that minimal construction waste will be generated by the proposed Expansion Project, particularly given that the proposed Expansion Area is currently undeveloped, and thusly does not contain materials that will need to be disposed of at a Landfill. The Victorville Sanitary Landfill has adequate capacity to handle the waste generated at the VVRCF. According to the CalRecycle, the maximum permitted capacity of Victorville Sanitary Landfill is 83,200,000 Cubic Yards (CY), while its remaining capacity is 81,510,000 CY; the Victorville Sanitary Landfill can accept 3,000 tons per day. Thus, there is adequate solid waste disposal capacity for solid waste generated as a result of implementation of the proposed Project both in the short term and long term.

Though it is not anticipated that substantial construction and demolition (C & D) waste will be generated by construction of the Project given that the site is mostly vacant and compacted in the areas proposed to be developed, any C & D waste will be recycled to the maximum extent feasible in accordance with the California Green Building Code, and any residual materials will be delivered to one of several C & D disposal sites in the area surrounding the project site. Additionally, should it be present, any hazardous materials collected on the project site during either construction of the Project will be transported and disposed of by a permitted and licensed hazardous materials service provider. Therefore, given that the proposed Expansion Project will have a beneficial effect on the solid waste disposal system, the Expanded VVRCF will continue to comply with federal, state, and local statutes and regulations related to composting operations. Thus, all solid waste impacts are expected to be less than significant.

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

SUBSTANTIATION

- a-d. *No Impact* – The proposed Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zone, therefore the proposed Project can have no impacts to any wildfire issues. According to the CAL FIRE Fire Hazard Severity Zones in Local Responsibility Areas (LRA) Map of San Bernardino County, the proposed Project is not located within a very high fire hazard severity zone in either a State Responsibility Area or an LRA (Figure XX-1). The project area is located within the existing VVRCF that is located in a rural/developed area that is removed from the high fire hazard areas that are located adjacent to the San Bernardino Mountains to the south. As such, no impacts under these issues are anticipated.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact or Does Not Apply |
|--|-----------------------------------|---|---------------------------------|--------------------------------|
| XXI. MANDATORY FINDINGS OF SIGNIFICANCE: | | | | |
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SUBSTANTIATION

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

- a. *Less Than Significant With Mitigation Incorporated* – The Project has no potential to cause a significant impact any biological or cultural resources. The Project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project requires mitigation to prevent significant impacts from occurring as a result of implementation of the Project. Mitigation to address the adjacent sensitive cultural resources is required, but will ensure that these sensitive resources are protected and will not be impacted by the proposed Project. Additionally, because it is not known what could be unearthed upon any excavation activities, mitigation measures are provided to ensure that, in the event that any resources are found, they are protected from any potential impacts. These measures include a requirement that archaeological and Native American monitoring occur during ground disturbing activities, and treatment of any resources that are found. Please see biological, cultural, and tribal cultural resource sections of this Initial Study.
- b. *Less Than Significant With Mitigation Incorporated* – The Project has 10 potential impact categories that are individually limited, but may be cumulatively considerable. These are: Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, Transportation, Tribal Cultural Resources, and Utilities & Service Systems. The Project is not considered growth-inducing, as defined by *State CEQA Guidelines*, particularly because the Project will expand the area of operations for the VVRCF, but will not expand the

permitted capacity of the Facility. The above issues require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed Project have been determined to be less than considerable and thus, less than significant impacts.

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

Conclusion

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

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

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

Revised 2019

Authority: Public Resources Code sections 21083 and 21083.09

Reference: Public Resources Code sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3/ 21084.2 and 21084.3

SUMMARY OF MITIGATION MEASURES

AIR-1 Fugitive Dust Control. The following measures shall be incorporated into project plans and specifications for implementation during construction:

- Apply soil stabilizers to inactive areas.
- Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds exceed 25 mph.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Apply water to disturbed surfaces and haul roads 3 times/day.
- Replace ground cover in disturbed areas quickly.
- Reduce speeds on unpaved roads to less than 15 mph.
- Trenches shall be left exposed for as short a time as possible.
- Identify proper compaction for backfilled soils in construction specifications.

This measure shall be implemented during construction, and shall be included in the construction contract as a contract specification.

AIR-2 The following signage shall be erected no later than the commencement of construction, and shall be included in the construction contract as a contract specification: A minimum 48 inch high by 96 inch wide sign containing the following shall be located within 50 feet of each project site entrance, meeting the specified minimum height text, black text on white background, on one inch A/C laminated plywood board, with the lower edge between six and seven feet above grade, identifying a responsible official for the site and local or toll free number that is accessible 24 hours per day:

"[Site Name] {four-inch text}
[Project Name/Project Number] {four-inch text}
IF YOU SEE DUST COMING FROM {four-inch text}
THIS PROJECT CALL: {six-inch text}
[Contact Name], PHONE NUMBER {six-inch text}
If you do not receive a response, Please Call {three-inch text}
The MDAQMD at 1-800-635-4617 {three-inch text}"

AIR-3 During project operations a water truck shall be available on-site at all times for dust control.

AIR-4 Additional wind breaks and/or fencing shall be developed in areas that are susceptible to high wind induced dusting, where required by VVRWA.

AIR-5 All material transported off-site with dust blow off potential shall be sufficiently watered or securely covered in a manner that prevent dust from being generated.

AIR-6 The VVRCF will continue to maintain a twenty-four hour messaging system with emergency contact list and phone numbers listed. Within 24 hours of receipt of any complaint, American Organics shall contact the person registering the complaint and provide that person with information regarding the actions being taken to eliminate or control the odor and when the odor will be eliminated or reduced below the odor significance thresholds.

BIO-1 A qualified biologist shall develop a Worker Environmental Awareness Program (WEAP) that will include information on general and special status species within the project area, identification of these species and their habitats, techniques being implemented during construction to avoid impacts to species, consequences of killing or injuring an individual of a listed species, and reporting procedures when encountering listed or sensitive species. Construction crews, foremen, and other personnel potentially working on site will attend this education program and place their name on a sign-in sheet. This briefing shall include provisions of any requirements required for the project. The contractor shall implement Worker Environmental Awareness

Program (WEAP) training on the first day of work and periodically throughout construction as needed.

BIO-2 Preconstruction surveys for Desert Tortoise shall be conducted no more than 14 days prior to new ground disturbance within each phase of development to verify that Mojave desert tortoise remain absent from the Project Area.

BIO-3 A biological monitor shall be present during the initial ground disturbing activities (clearing, grubbing and initial grading) to ensure no sensitive resources wander onto the site and to ensure no impacts will result during construction.

BIO-4 Preconstruction presence/absence surveys for burrowing owl shall be conducted no less than 14 days prior to any onsite ground disturbing activity by a qualified biologist. The burrowing owl surveys shall be conducted pursuant to the recommendations and guidelines established by the California Department of Fish and Wildlife in the "California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation." In the event this species is not identified within the Project limits, no further mitigation is required, and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to commencement of Project activities. If during the preconstruction survey, the burrowing owl is found to occupy the site, Mitigation Measure BIO-2 shall be required.

BIO-5 If burrowing owls are identified during the survey period, VVRWA and/or the Applicant shall take the following actions to offset impacts prior to ground disturbance:

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

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

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

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

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

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

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

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

- BIO-6 Burrowing owl shall be included as one of the species covered in the WEAP that all construction crews, foremen, and other project personnel potentially working on site shall attend prior to the first day of work.
- BIO-7 Nesting bird surveys shall be conducted by a qualified avian biologist no more than three (3) days prior to vegetation clearing or ground disturbance activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the preconstruction nesting bird surveys, a Nesting Bird Plan (NBP) shall be prepared and implemented by the qualified avian biologist. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, individual/pair's behavior, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. To avoid impacts to nesting birds, any grubbing or vegetation removal should occur outside peak breeding season (typically February 1 through September 1).
- CUL-1 An archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities within areas that have moderate-to-high potential for prehistoric cultural resources, henceforth referred to as "culturally-sensitive areas." Ground-disturbing activities include, 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 workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage.
- CUL-2 In the event that cultural resources are discovered during monitoring activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department shall be contacted, as detailed within TCR-1, regarding any pre-contact finds and shall be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

- CUL-3 A Monitoring and Treatment Plan (MTP) that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the Project 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. The MTP will also demarcate the areas of the Project that will be subject to archaeological and tribal monitoring (CUL-1, TCR-1).
- CUL-4 For any resources that are uncovered that prove to be significant under the appropriate CEQA criteria, as determined by a qualified archaeologist meeting Secretary of Interior standards, mitigation of potential project impact is required. These measures may focus on the following procedures, aimed at the preservation of physical and/or archival data about a significant cultural resource that would be impacted by the project:
- Data recovery through further excavation at an archaeological site or a paleontological locality to collect a representative sample of the identified remains, followed by laboratory processing and analysis as well as preparation for permanent curation;
 - Comprehensive documentation of architectural and historical data about a significant building, structure, or object using methods comparable to the appropriate level of the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER) for permanent curation at a repository or repositories that provides access to the public;
 - Adjustments to project plans to minimize potential impact on the significance and integrity of the resource(s) in question.
- CUL-5 The Applicant is required to contact the Project Archaeologist at least 5 business days in advance of ground-disturbing activities within culturally-sensitive areas to ascertain monitor availability. If the Applicant fails to give sufficient notice to Project Archaeologist, or if it is discovered that ground-disturbing activities occurred within culturally-sensitive areas without the presence of archaeological and tribal monitors, then the Applicant will be responsible for providing for the presence of archaeological and tribal monitors at all times for the entirety of the project area.
- CUL-6 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.
- GEO-1 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup.
- GEO-2 American Organics shall identify additional BMPs to ensure that the discharge of surface water does not cause erosion downstream of the discharge point. This shall be accomplished by reducing the energy of any site discharge through an artificial energy dissipater or equivalent device. If any substantial erosion or sedimentation occurs, any erosion or sedimentation damage shall be restored to pre-discharge conditions.
- GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently when fugitive dust is observed migrating from the sites within which the VVRCF Expansion areas are being constructed.

- GEO-4 Storm runoff facilities shall be installed within operating areas and downstream to the Mojave River channel to ensure that flows from the areas utilized for operations shall not cause or result in significant erosion or sedimentation that would violate water quality objectives for the Mojave River channel.
- GEO-5 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with VVWRA's onsite inspector. The paleontological professional shall assess the find, determine its significance, and determine appropriate mitigation measures within the guidelines of the California Environmental Quality Act that shall be implemented to minimize any impacts to a paleontological resource. Treatment of any discovered paleontological resources shall follow the Phasing and corresponding actions identified under MM CUL-1 through CUL4 and in MMs TCR-1 through TCR-4.
- HAZ-1 All accidental spills or discharge of hazardous material during construction activities shall be reported to the Certified Unified Program Agency and shall be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately a licensed disposal or treatment facility. This measure shall be incorporated into the SWPPP prepared for the VVRCF. Prior to accepting the site as remediated, the area contaminated shall be tested to verify that any residual concentrations meet the standard for future residential or public use of the site.
- HAZ-2 a) Material containing food waste shall be processed inside the building to remove trash and contaminants, which are transferred offsite for disposal; b) Close doors at night; and c) Initial screening and contaminant removal will be conducted inside the building. This process will separate contaminants (paper, plastic, glass, etc.) from compostable material in a controlled, protected environment.
- HAZ-3 Aerated Static Pile Composting Operation: a) Self-contained concrete pad with aeration system; b) Bio-layer over compost – controls odors and vectors – including birds; c) The material shall be composted for a period of time until it is no longer a vector attractant; d) Composting process shall be conducted on a concrete pad with mechanical induction of air, which will reduce processing time to 30 to 45 days; e) The concrete beds limit the amount of area necessary for composting material and when necessary shall be tarped as additional measure for bird control; and f) The leachate control system includes subgrade piping and storage tanks which will capture liquid from the aerated static pile composting operation.
- HAZ-4 A lined basin shall be used to control surface water. Any standing water will be pumped directly into water trucks or storage units for re-use as dust control
- HAZ-5 The following operational controls shall be implemented. a) Bird Cannons – set to operate at given intervals during operating hours; b) Bird bombs and whistler pyrotechnics – used by site personnel as a supplemental control tool; and c) American Organics shall diligently pursue a depredation permit to allow direct control of birds and shall implement bird control in accordance with the depredation permit.
- HYD-1 The construction contractor shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies Best Management Practices (BMPs) that will be implemented to prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving offsite. The SWPPP shall be developed with the goal of achieving a reduction in pollutants both during and following construction to control storm water runoff to the maximum extent practicable based on available, feasible best management practices.

The following BMPs or comparable measures shall be included in the SWPPP:

- Stockpiled material should not be stored in areas which are subject to the erosive flows of water.
- Measures such as the use of straw bales, sandbags, silt fencing or detention basins shall be used to capture and hold eroded material for future cleanup.
- Rainfall will be prevented from entering material and waste storage areas and pollution-laden surfaces.
- Construction-related contaminants will be prevented from leaving the site and polluting waterways.
- A spill prevention control and countermeasures and remediation plan shall be in place and implemented to control release of hazardous substances.

- HYD-2 Runoff intercepted upstream of the Expanded Facility sites shall be captured and either diverted around the site and returned to its existing downstream channel or an alternative that does not cause damage due to erosion and sedimentation or to any wetland/riparian habitat that may be dependent on such flows. If the upstream drainage management solution increases or concentrates flows in a manner that could damage downstream areas, adequate energy dissipation devices shall be installed to ensure that no significant downstream changes affect the environment.
- HYD-3 All flows generated on the Expanded Facility sites shall be collected within the operations areas and flows shall be released from the water quality management basins at a volume not greater than historic flows that flowed from the eastern edge of the existing VVRCF operating site. Flows released downstream of the Facility shall be designed to not cause any significant adverse impact to existing environmental resources downstream of the discharge location.
- NOI-1 VVWRA shall require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.
- NOI-2 Equipment not in use for five minutes shall be shut off.
- NOI-3 Equipment shall be maintained and operated such that loads are secured from rattling or banging.
- NOI-4 Where commercially available, electric-powered equipment shall be used rather than diesel equipment and hydraulic-powered equipment shall be used instead of pneumatic power.
- NOI-5 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment. This measure shall be included in the construction contract as a contract specification by the contractor.
- NOI-6 No radios or other sound equipment shall be used at this site unless required for emergency response by the contractor.
- NOI-7 Construction shall be limited to the hours of 7 AM and 6 PM Monday through Friday, 8 AM and 5 PM Saturday, and shall not be allowed on Sundays or any Federal Holiday unless an emergency warrants the continuation of construction outside of the aforementioned hours.
- TRAN-1 American Organics shall provide a flag person to control traffic during morning and evening peak hours to ensure that hazards are minimized for employees or customers entering or exiting the overall VVWRA site during construction of the expanded VVRCF.

- TRAN-2 The construction contractor will provide traffic management resources, to be determined by VVWRA. VVWRA shall require a construction traffic management plan for work in public roads that complies with the Work Area Traffic Control Handbook, or other applicable standard, to provide adequate traffic control and safety during excavation activities. At a minimum this plan shall include how to minimize the amount of time spent on construction activities; how to minimize disruption of vehicle and alternative modes of transport traffic at all times, but particularly during periods of high traffic volumes; how to maintain safe traffic flow on local streets affected by construction at all times, including through the use of adequate signage, protective devices, flag persons or police assistance to ensure that traffic can flow adequately during construction; the identification of alternative routes that can meet the traffic flow requirements of a specific area, including communication (signs, webpages, etc.) with drivers and neighborhoods where construction activities will occur; and at the end of each construction day roadways shall be prepared for continued utilization without any significant roadway hazards remaining.
- TCR-1 Due to the presence of sensitive tribal cultural resources in the project area, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in the Monitoring and Treatment Plan (CUL-2), if any prehistoric cultural resources discovered during project implementation. The Monitoring and Treatment Plan shall allow for a tribal monitor to be present for the remainder of the Project, should SMBMI elect to place a monitor on-site. In such cases, a sufficient number of tribal monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. The Lead Agency and/or Applicant shall, in good faith, consult with SMBMI throughout the life of the Project.
- TCR-2 If a pre-contact cultural resource is discovered during project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.
- If the discovery is determined to be potentially significant by any consulting party, a research design shall be developed by the archaeologist that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the Project Archaeologist/Applicant, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the archaeological significance of the resource, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource.
- TCR-3 Where avoidance and preservation in place are not possible, all tribal cultural resources discovered during archaeological testing or project implementation shall be reburied in a location decided upon by SMBMI, the Applicant, and the Lead Agency. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. All removed material shall be temporarily curated on-site in a secure location prior to reburial. Reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI.
- Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of

the collections and associated records and the obligation of the Project developer/Applicant to pay for those fees.

- TCR-4 All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

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<https://gis.water.ca.gov/app/bbat/>

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https://www.vvwra.com/edu_resources/rep.htm

Websites

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<https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557>

https://www.vvwra.com/about_us/welcome/default.htm

https://www.vvwra.com/edu_resources/rep.htm

FIGURES



FIGURE 1

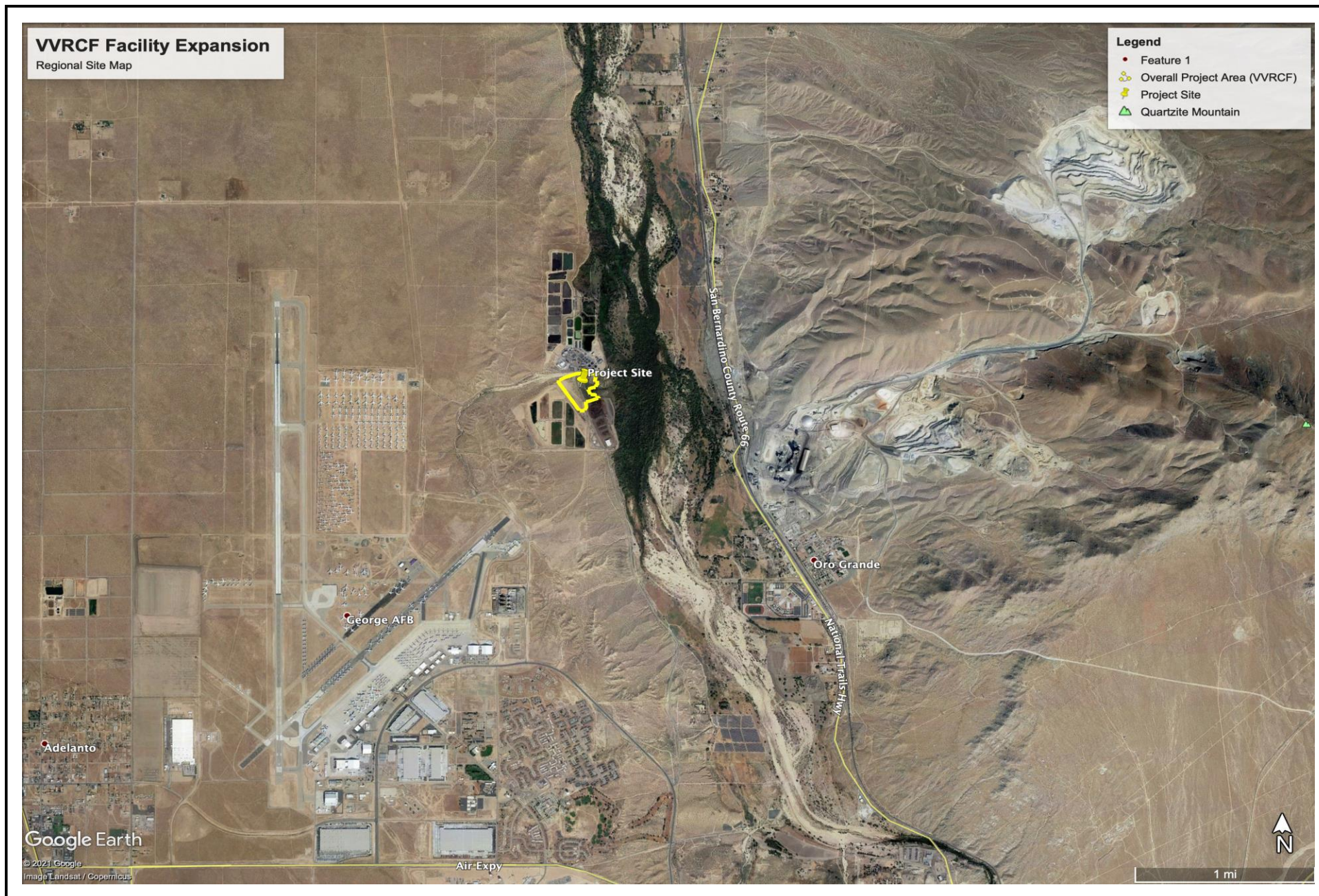


FIGURE 2



FIGURE 3

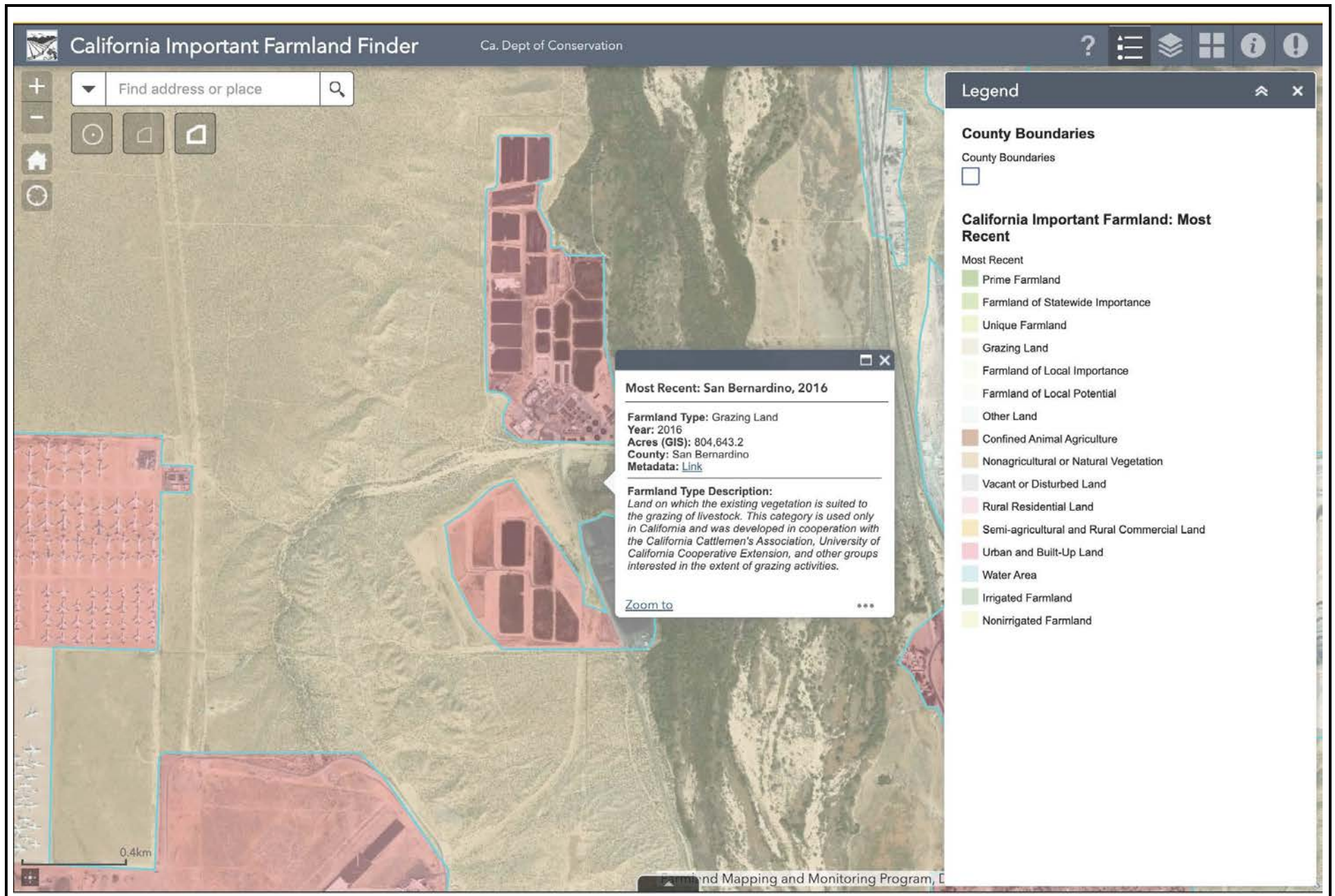


FIGURE II-1

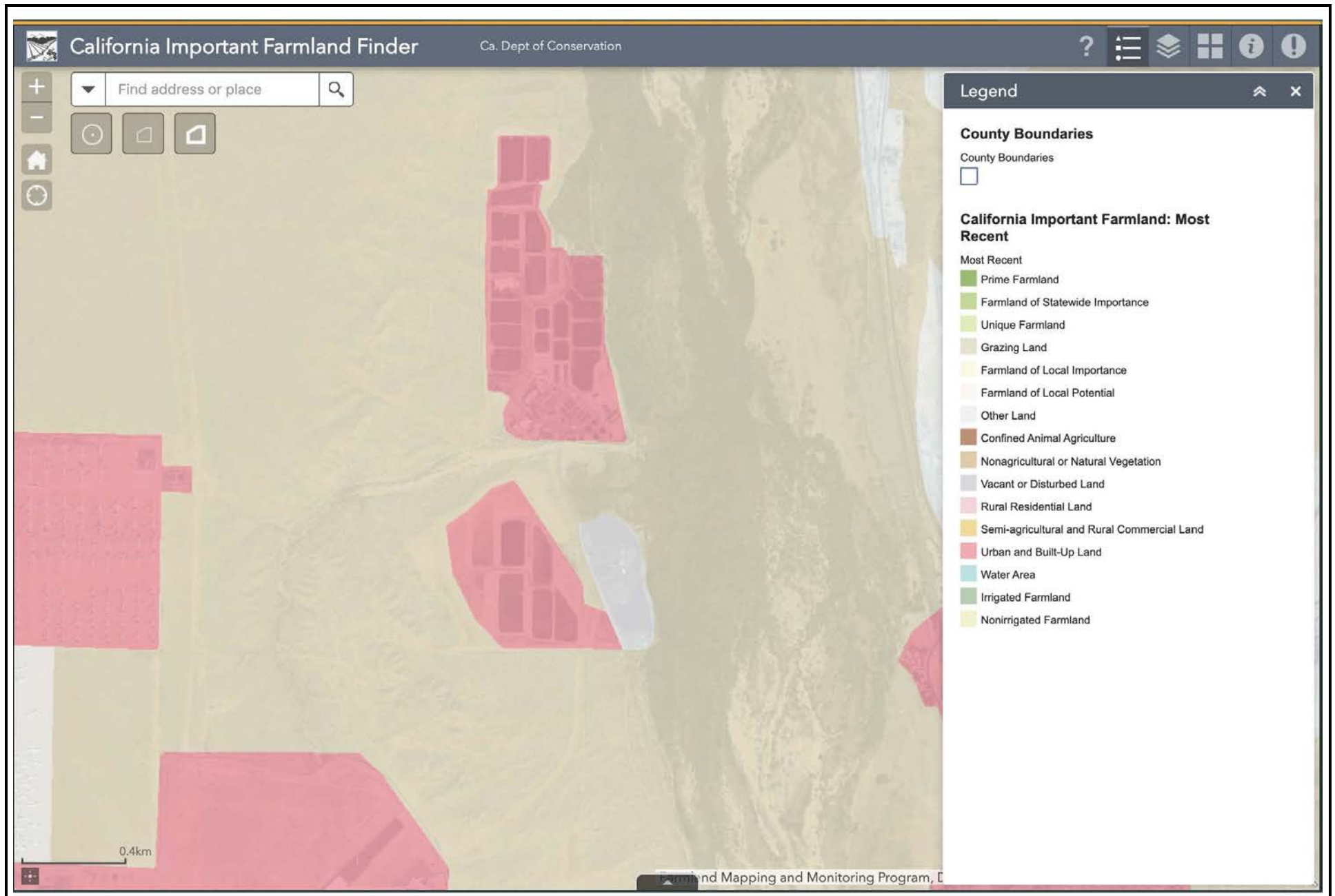


FIGURE II-2

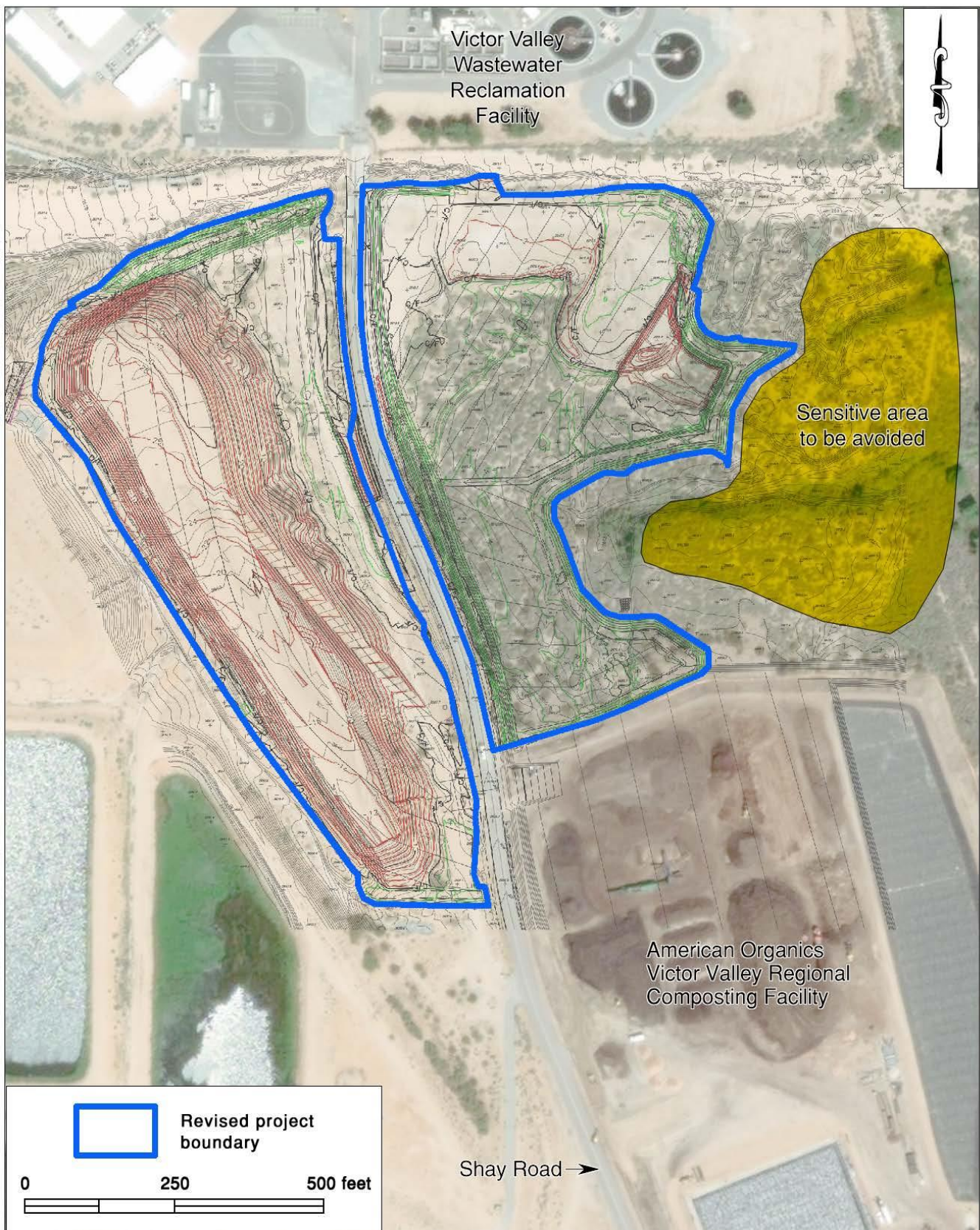


FIGURE V-1

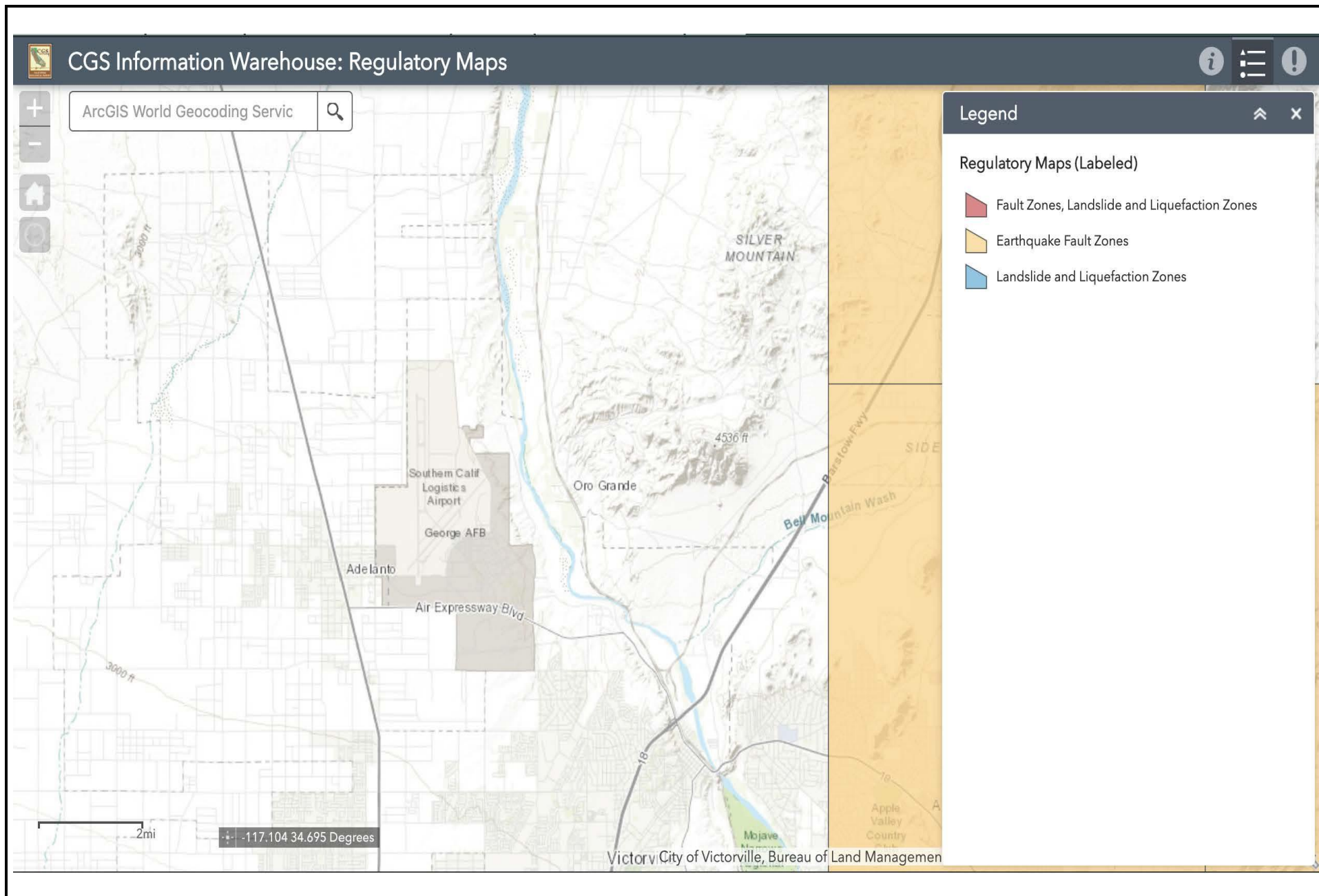
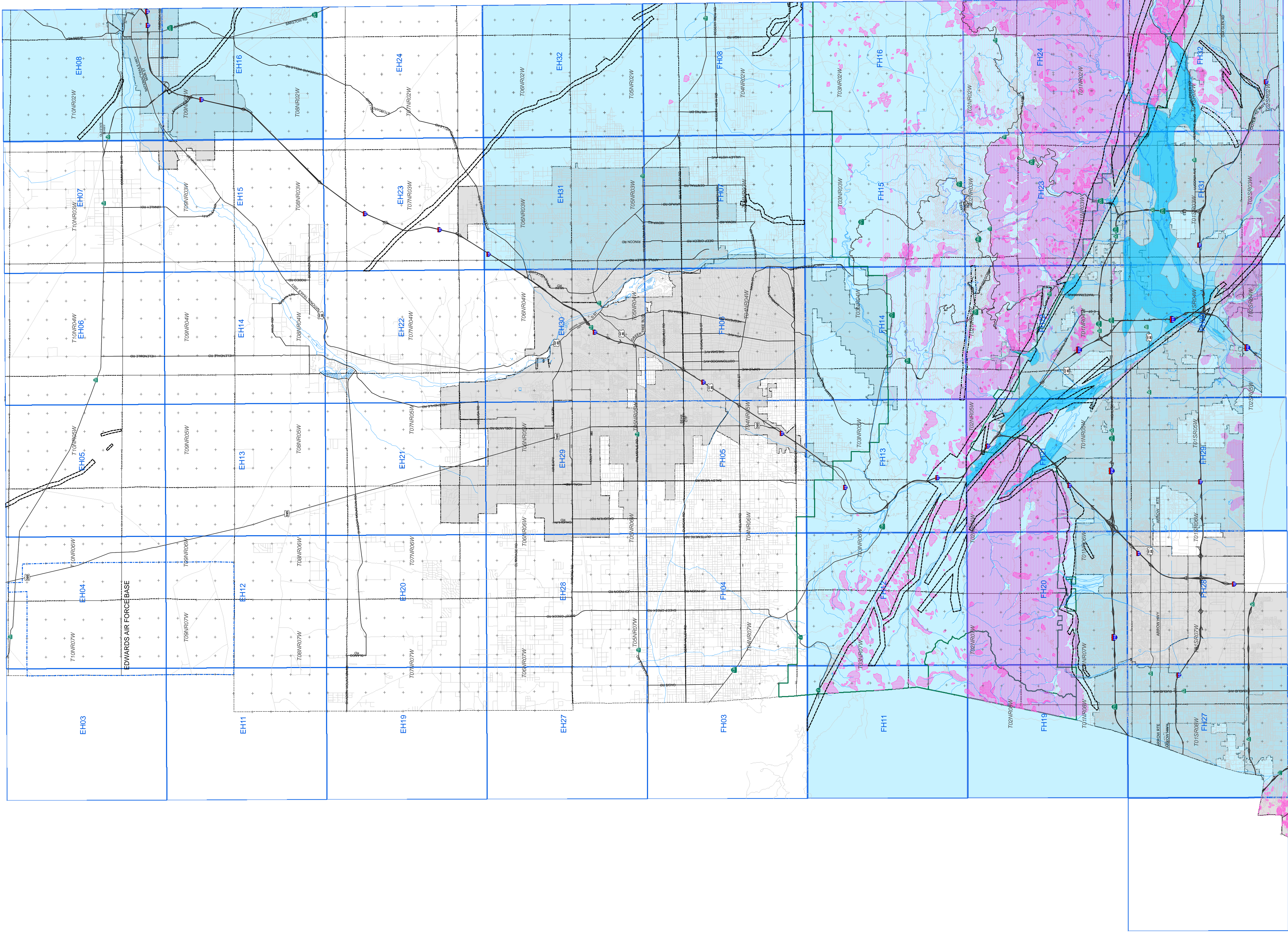


FIGURE VII-1

See GHHC

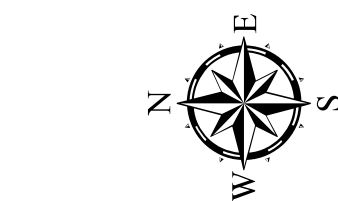


See GHHC

San Bernardino County Land Use Plan GENERAL PLAN Geologic Hazard Overlays

Zone of Suspected Liquefaction Susceptibility

Generalized Landslide Susceptibility



The Zone of Suspected Liquefaction Susceptibility was compiled by the San Bernardino County Geologist, 2009. Positional accuracy of map data is at best plus or minus 200 feet.

Map data originally compiled on 1:40,000 scale maps by the U.S. Geological Survey, 1974 and by S.B. San Bernardino County Geologist, 2009. Positional accuracy of map data is at best plus or minus 100 feet.

Generalized Liquefaction Susceptibility

Low
Medium
High

Map data originally compiled on 1:40,000 scale maps by the U.S. Geological Survey, 1974 and by S.B. San Bernardino County Geologist, 1986. Positional accuracy of map data is at best plus or minus 100 feet.

Earthquake Fault Zones

County Designated Fault Zones

Detail Quad Map

Map data compiled on 1:12 and 1:50,000 scale maps by the State of California, Division of Mines and Geology, 1997. Positional accuracy of map data is at best plus or minus 100 feet. The map is titled "Special Studies Zone" and was compiled by the State of California, Division of Mines and Geology, 1997. The map is titled "Special Studies Zone" and was compiled by the State of California, Division of Mines and Geology, 1997. The map is titled "Special Studies Zone" and was compiled by the State of California, Division of Mines and Geology, 1997.



FIGURE VII-2

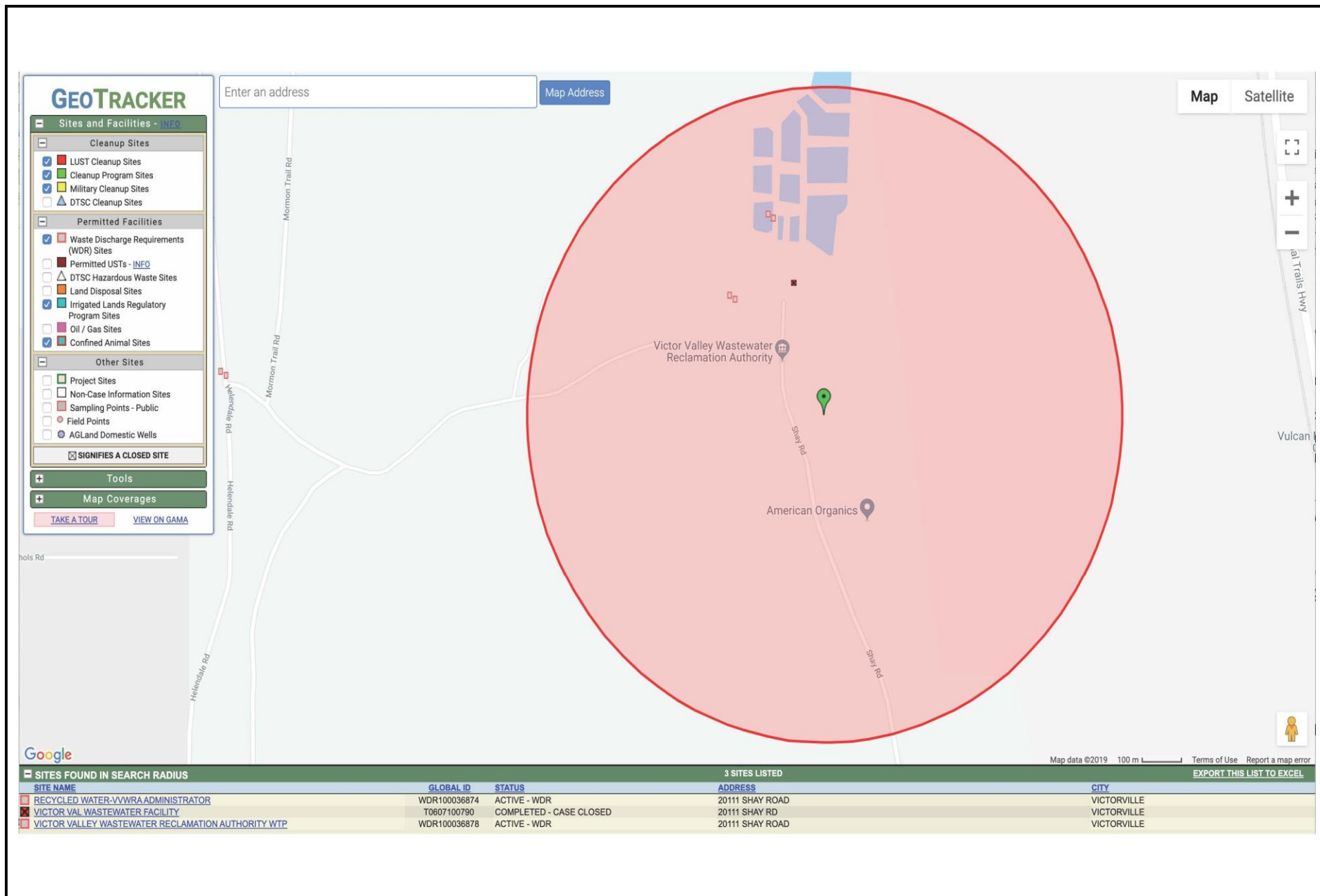


FIGURE IX-1



STATE WATER RESOURCES CONTROL BOARD GEOTRACKER

[Tools](#)[Reports](#)[UST Case Closures](#)[Information](#)

VICTOR VAL WASTEWATER FACILITY (T0607100790) - [\(MAP\)](#)

[SIGN UP FOR EMAIL ALERTS](#)

20111 SHAY RD
VICTORVILLE, CA 92392
SAN BERNARDINO COUNTY
LUST CLEANUP SITE [\(INFO\)](#)

[PRINTABLE CASE SUMMARY](#) / [CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES

SAN BERNARDINO COUNTY ([LEAD](#)) - CASE #: 92044

CASEWORKER: [CURTIS BRUNDAGE](#)

LAHONTAN RWQCB (REGION 6V) - CASE #: 6B3600487T

CASEWORKER: [JEHIEL CASS](#)

[Summary](#) [Cleanup](#) [Action Report](#) [Regulatory Activities](#) [Environmental Data \(ESI\)](#) [Site Maps / Documents](#) [Community Involvement](#) [Related Cases](#)

Regulatory Profile

[PRINTABLE CASE SUMMARY](#)

CLEANUP STATUS - [DEFINITIONS](#)

COMPLETED - CASE CLOSED AS OF 11/23/1992 - [CLEANUP STATUS HISTORY](#)

POTENTIAL CONTAMINANTS OF CONCERN

WASTE OIL / MOTOR / HYDRAULIC / LUBRICATING

FILE LOCATION

LOCAL AGENCY

DWR GROUNDWATER SUB-BASIN NAME

Upper Mojave River Valley (6-042)

POTENTIAL MEDIA OF CONCERN

SOIL

DESIGNATED GROUNDWATER BENEFICIAL USE(S) - [DEFINITIONS](#)

MUN, AGR, IND, FRSH, AQUA

CALWATER WATERSHED NAME

Mojave - Upper Mojave (628.20)

Site History

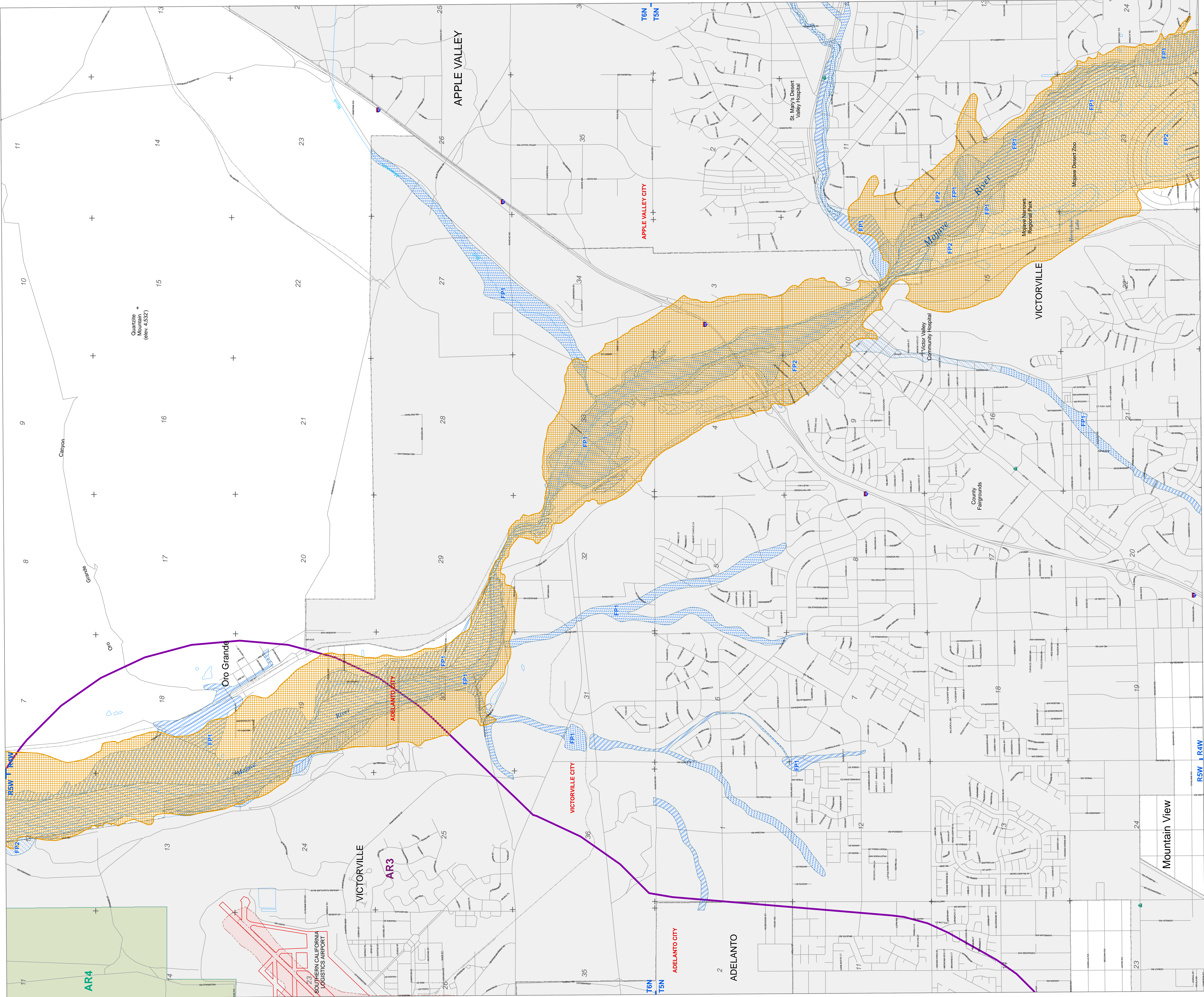
No site history available

FIGURE IX-2

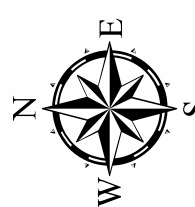
See EH22 B

See EH29 B

See EH31 B



See FH06 B



Dam Inundation
Area of Inundation
Dam
Limit of Study

Map data compiled on 7/2 and 11/2009
Map data compiled on 7/2 and 11/2009
Positional accuracy of map data is at least plus or minus 250 feet.

Flood Plain Safety (FP) Overlay District
FP1 (Zone A - Inside 100 Year Flood Plain)
FP2 (Zone X - Inside 500 Year Flood Plain)
FP3 (Local Flood Data)

Map data compiled on 7/2 and 11/2009
Map data compiled on 7/2 and 11/2009
Positional accuracy of flood plain data is at least plus or minus 150 feet.

Noise Hazard (NH) Overlay District
Noise Contour in LDN
Runway Location

Map data compiled on 7/2 and 11/2009
Map data compiled on 7/2 and 11/2009
Positional accuracy of noise data is at least plus or minus 750 feet.

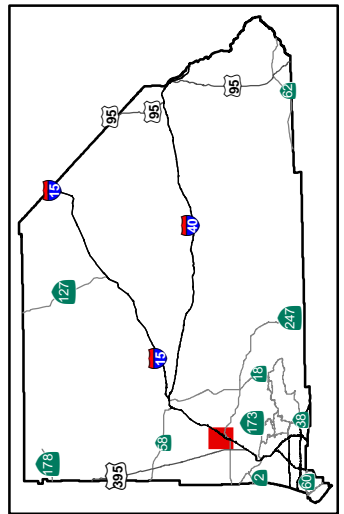
San Bernardino County Land Use Plan GENERAL PLAN Hazard Overlays

Fire Safety (FS) Overlay District
Fire Safety Boundary
FS1 Fire Safety Area 1
FS2 Fire Safety Area 2

Map data compiled on 7/2 and 11/2009
Map data compiled on 7/2 and 11/2009
Positional accuracy of map data is at least plus or minus 750 feet.

Airport Safety Review
AR3 (Airport Safety Review Area 3)
AR4 (Airport Safety Review Area 4)

Map data compiled on 7/2 and 11/2009
Map data compiled on 7/2 and 11/2009
Positional accuracy of map data is at least plus or minus 750 feet.



EH30 B
Victorville

FIGURE IX-3

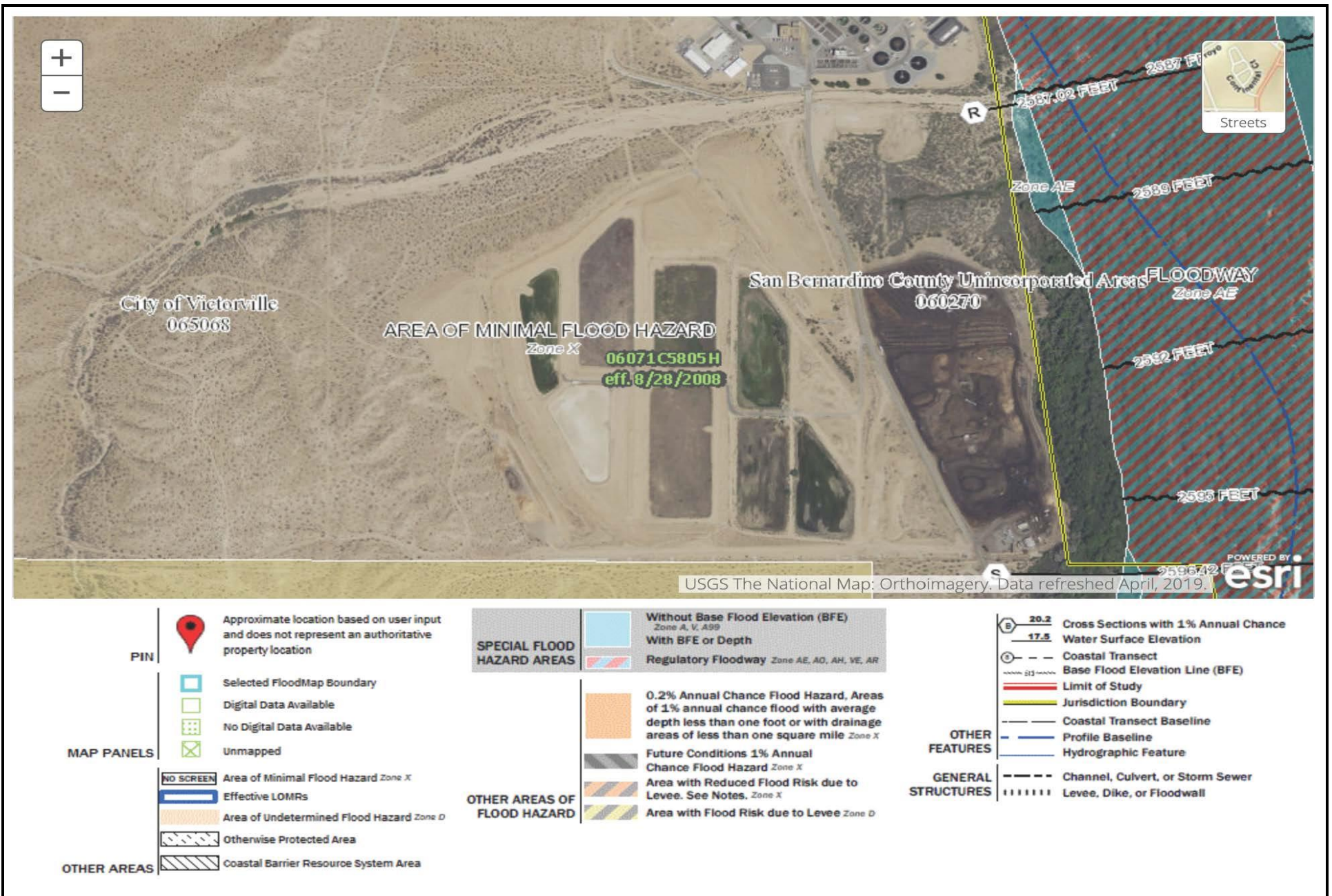
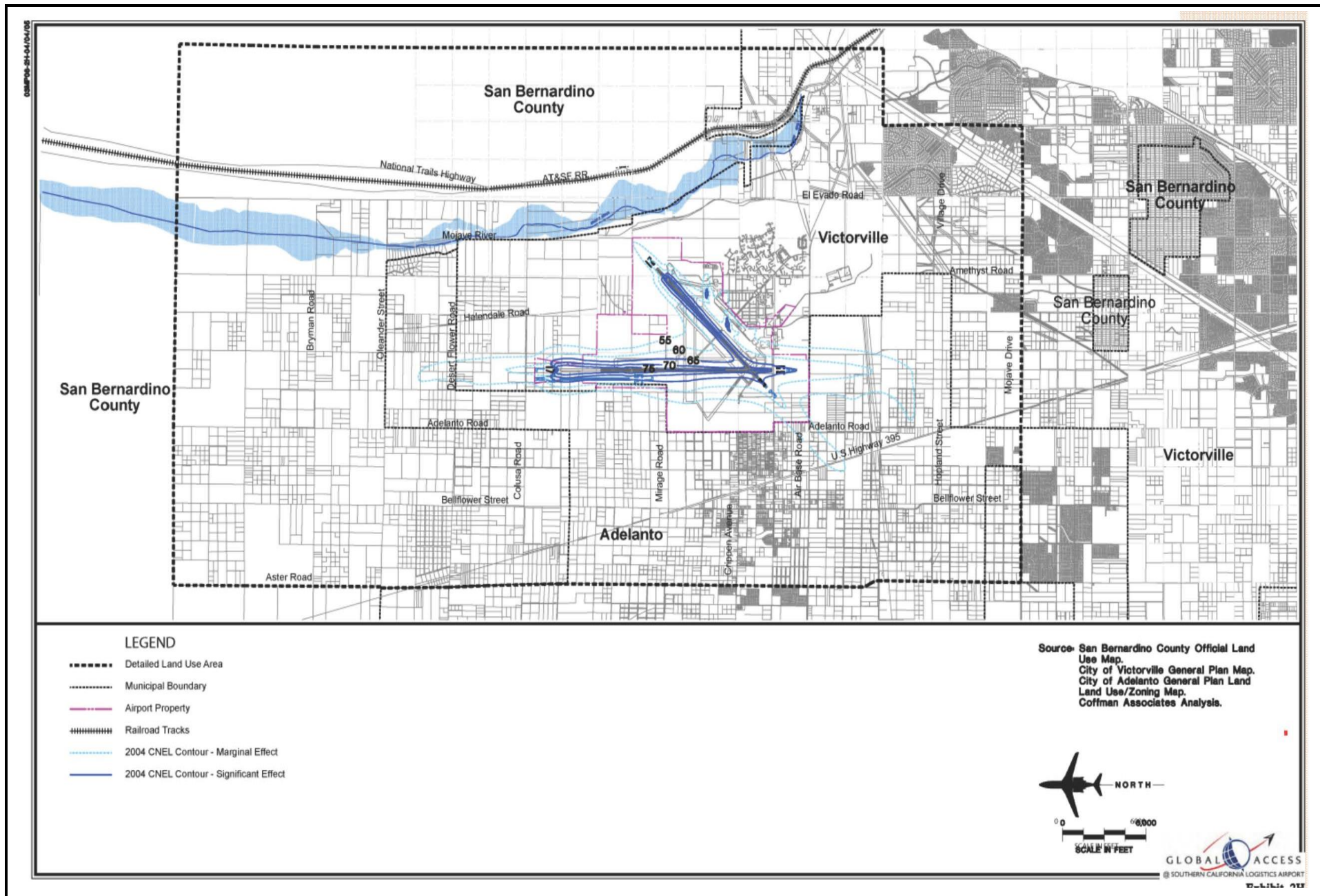


FIGURE X-1

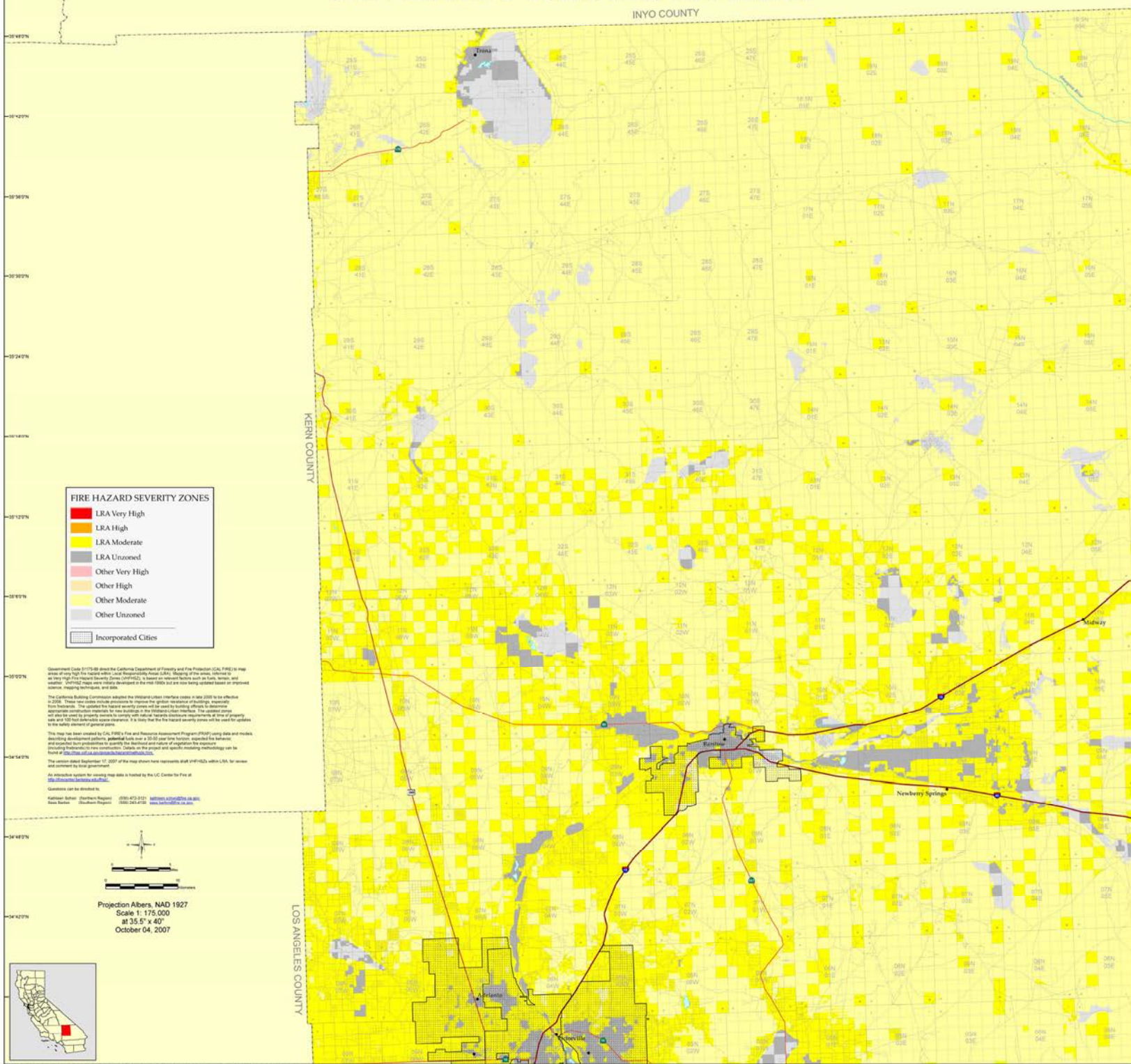


SOURCE: Southern California Logistics Airport

FIGURE XIII-1

DRAFT FIRE HAZARD SEVERITY ZONES IN LRA

FIGURE XX-1



FIRE HAZARD SEVERITY ZONES

- LRA Very High
- LRA High
- LRA Moderate
- LRA Unzoned
- Other Very High
- Other High
- Other Moderate
- Other Unzoned
- Incorporated Cities

Government Order 01719-08 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of very high fire hazard within Local Responsibility Areas (LRAs). Mapping of these areas, referred to as Very High Fire Hazard Severity Zones (VHFSZs), is based on various factors such as fuels, slope, aspect, elevation, and other factors. The map shows the results of this mapping process. The map is a draft and is subject to change. The map is for informational purposes only and should not be used for legal or financial decisions. The map is the property of CAL FIRE and is not to be reproduced without permission. The map is available for viewing on the Internet at <http://frap.cdf.ca.gov>. The map is available for viewing on the Internet at <http://frap.cdf.ca.gov>. The map is available for viewing on the Internet at <http://frap.cdf.ca.gov>.

Projection: Albers, NAD 1927
Scale: 1:175,000
at 35° 5' x 40"
October 04, 2007

