California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration

Vesting Tentative Tract Map No.20368

Lead Agency

City of Victorville Development Department
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Prepared By

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June 21, 2021

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1.0 Environmental Checklist Form Background Information

1. Project title: Vesting Tentative Tract Map PLAN21-00011 (VTM 20368).

2. Lead agency name and address: City of Victorville Planning Division, PO Box 5001, Victorville, California 92393-5001.

3. Contact person and phone number: Alex Jauregui, Senior Planner (760) 955-5135, email: AJauregui@victorvilleca.gov.

4. Project location: The Project site consists of 18.1 gross acres located on the southeast corner of Topaz Road and Eucalyptus Street. The Project site is identified by the following Assessor Parcel Numbers: 0405-322-08,09.

5. Project sponsor's name and address: Frank Tanner c/o United Engineering Group, 8885 Haven Avenue, Suite 195 Rancho Cucamonga, California 91730.

6. General plan designation: Low Density Residential (5 du/ac).

7. Zoning: R-1T (Single-Family Residential).

8. Description of project: To allow for the recordation and development of a 65-lot single family residential subdivision (Vesting Tentative Tract Map 20368) with 7,200 sq. ft. minimum size lots, on an approximately 18.1 acre building site that is vacant and undeveloped with an approximate density of 3.6 units per acre.

9. Surrounding land uses and setting: The project site is bordered on the north by Eucalyptus Street followed by single-family residential development, on the south by vacant undeveloped land with single-family residential zoning, on the east by vacant undeveloped land with single-family residential zoning and primarily consisting of the Oro Grande Wash, and on the west by Topaz Road followed by vacant undeveloped commercial land.

10. Other public agency whose approval is required: Recordation of a final map, issuance of a building permits and completion of structures to current building code is required by the City prior to establishment of the subdivision. In addition approvals from the following agencies are required:

- □ Lahontan Regional Water Quality Control Board (General Construction Storm Water Permit).
- □ California Department of Fish and Wildlife (Incidental Take Permit 2018 for Joshua Trees)

11. Native American Tribal Consultation: On April 15, 2021 the City of Victorville commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting

notification, pursuant to Public Resources Code section 21080.3.1. The San Manuel Band of Mission Indians (SMBMI) responded and indicated the proposed Project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the Cultural Resources Management Department's present state of knowledge, SMBMI had no concerns with the Project's implementation, as planned, at this time. As a result, SMBMI requested that Mitigation Measure TCR-1 be made a part of the project/permit/plan conditions.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION

Based on this initial evaluation:

I find that the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be recommended for adoption.	☐
I find that although the proposal 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 Applicant. A **MITIGATED NEGATIVE DECLARATION** will be recommended for adoption.	X
I find that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the proposal MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	☐
I find that although the proposed Project could have a significant effect on the environment, because all potgentially significnat effect (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to all applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures are are imposed upon the proposed Project, nothing further is required.	☐

	City of Victorville
Signature	**Lead Agency**
Alex Jauregui, Senior Planner	
Printed Name/Title	**Date**

2.0-Introduction

2.1-Purpose of the Initial Study/Mitigated Negative Declaration

An Initial Study is a preliminary analysis to determine whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) is required for a Project. Based on the Initial Study prepared for the Project, it is recommended that a Mitigated Negative Declaration be adopted. A Mitigated Negative Declaration is a statement by the City of Victorville that the Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole of the record before the Lead Agency that the project, with incorporation of mitigation measures, may have a significant effect on the environment.

2.2- Environmental Impacts Requiring Mitigation

Table 2-1 identifies the environmental impacts that require mitigation. All other topics either have "No Impact" or a "Less than Significant Impact" as identified throughout this Initial Study.

Table 2.1 Summary of Environmental Impacts Requiring Mitigation

Environmental Topic Section	Description of Impact	Mitigation Measure
4.4 (b) Biological Resources	Grading may impact the burrowing owl.	**BIO-1:** 30-day preconstruction burrowing owl survey is required.
4.4 (d) Biological Resources	Vegetation removal may impact nesting birds protected by the Migratory Bird Treaty Act.	**BIO-2**: Vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1 through October 1), unless a migratory bird nesting survey is completed.
4.5 (b) Cultural Resources	Sub-surface archaeological resources may be encountered during ground disturbance.	**CR-1**: Stop work and resource to be evaluated by an archaeologist. **CR-2:** If resource significant, an archaeological treatment plan is required.

Environmental Topic Section	Description of Impact	Mitigation Measure
4.7 (f) Geology and Soils	Sub-surface paleontological resources may be encountered during ground disturbance.	**GEO-1**: : Stop work and resource to be evaluated by a paleontologist. **GEO-2:** If resource significant, a paleontological treatment plan is required.
4.13 (a) Noise	Construction noise will impact adjacent residences.	**NOI-1**: Requires construction noise mitigation measure notes be placed on grading plans.
4.18 (b) Tribal Cultural Resources	Sub-surface tribal cultural resources may be encountered during ground disturbance.	**TCR-1 through TCR-6** requires monitoring during ground disturbance and a treatment plan if significant resources are found.
4.19 (a) Utilities and Service Systems	Undergrounding of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, Tribal Cultural Resources, and generate excessive noise.	Mitigation Measures BIO-1, BIO-2, CR-1, CR-1, GEO-1, GEO-2, NOI-1 and TCR 1 through TCR-6 are required.

3.0-Project Description/Environmental Setting

3.1 – Project Location

The Project site consists of 18.1 gross acres located on the southeast corner of Topaz Road and Eucalyptus Street. The Project site is identified by the following Assessor Parcel Numbers: 0405-322-08,09. (See Figure 3.1-*Regional Location Map* and Figure 3.2-*Vicinity Location Map and Aerial Photo*).

3.2 -Project Description

The Project proposes a vesting tentative tract map to subdivide 18.1 acres into 65 lots for single-family detached residential development with a minimum lot size of 7,200 square feet. There are also 3 lettered lots for storm drainage facilities.

3.3-Proposed Improvements

Street Improvements and Access

Topaz Road

Topaz Road, along the Project frontage, will be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 49-foot, half-width right-of-way.

Eucalyptus Street

Eucalyptus Street will be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 64-foot, half-width right-of-way.

Internal Streets

Proposed internal streets will be public roads improved with pavement, curb, gutter, sidewalk, driveway approaches, and landscaped parkway within a 60-foot, full-width right-of-way.

Water and Sewer Improvements

Water Service

The Project will connect to the existing waterline located at the intersection of Eucalyptus Street and Topaz Road.

Sewer Service

The Project will connect to the existing sewer line located at the intersection of Eucalyptus Street and Topaz Road.

Storm Drainage Improvements

The primary hydraulic design elements are the roads and the storm drain. Roads within the Project will be used to carry runoff to a proposed water quality basin designed for both retention and detention before discharging to the existing storm drain in Eucalyptus Street.

<Figure 3.1- Location Map is on the next page>

Figure 3.1- Location Map

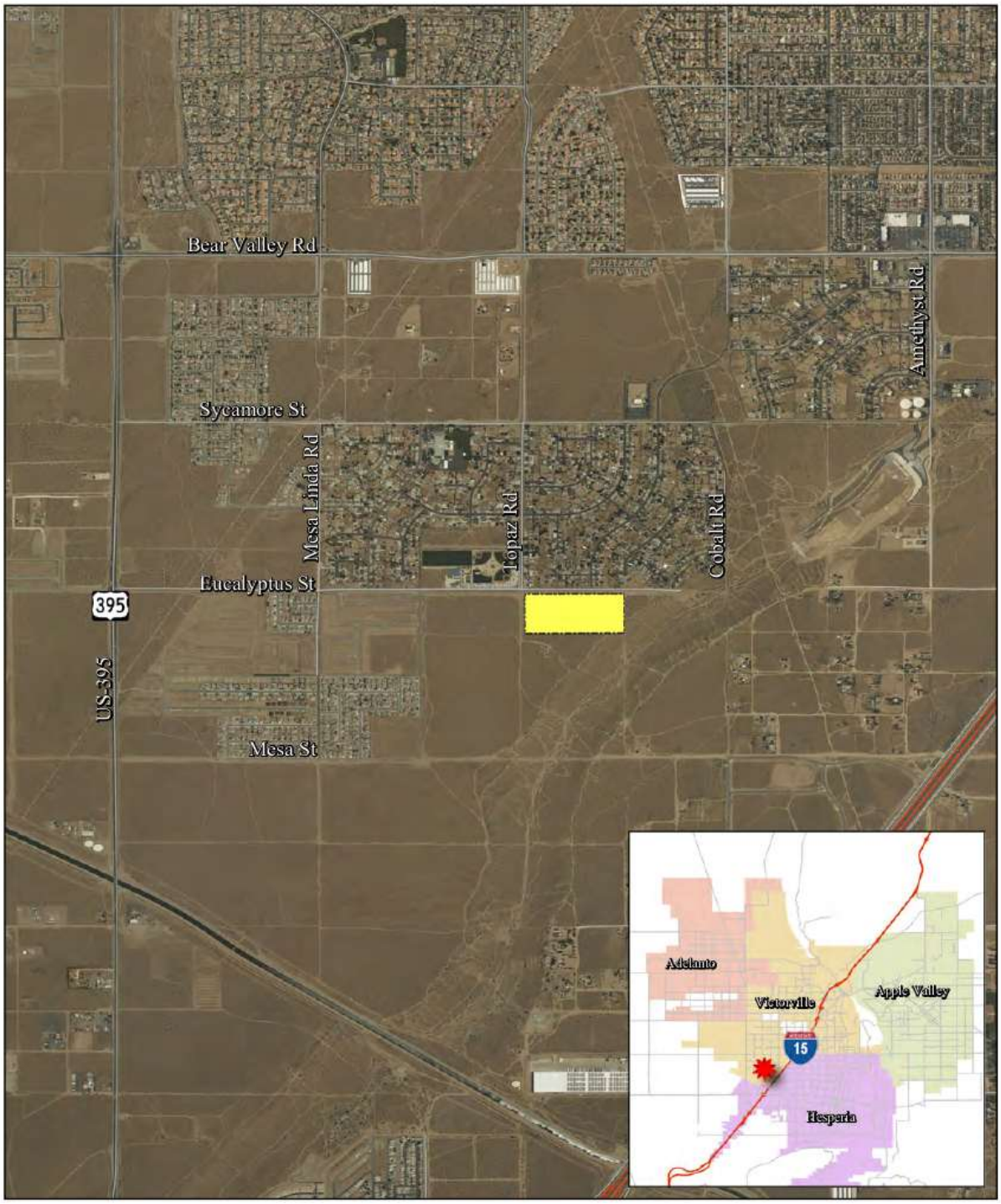

Figure 3.2- Site Aerial Photo

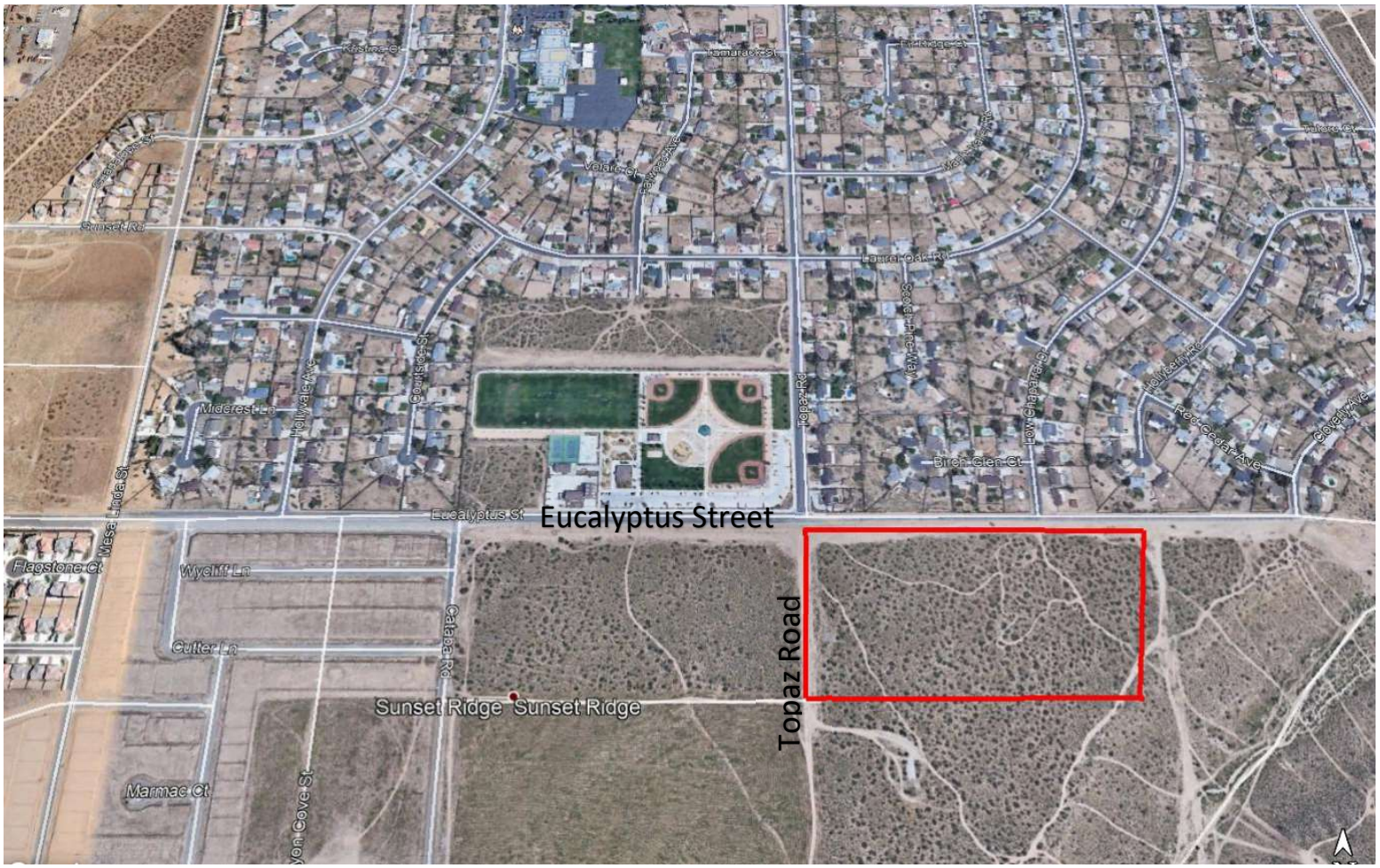

Figure 3.3- Lot Layout

3.4- Construction and Operational Characteristics

Construction Schedule

Houses will be constructed based on market demand and absorption. Construction is expected to commence sometime in 2022 and would occur in several general phases until completion at some undermined time in the future. The Project Applicant expects the following time durations for the construction process, which would be somewhat sequential but overlap in some cases:

- Site Preparation 10 - days
- Grading 30 - days
- Building Construction 300 – days
- Architectural Coating 20 – days
- Paving 20-days

Operational Characteristics

The proposed Project would be operated as a residential community. As such, typical operational characteristics include residents and visitors traveling to and from the site, leisure and maintenance activities occurring on individual residential lots and in the on-site recreational facilities and general maintenance of common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community is expected.

3.5-Environmental Setting

Onsite and adjacent land uses, General Plan land use designations, and zoning classifications are shown in Table 3.1.

Table 3.1: Land Uses, General Plan Land Use Designations, and Zoning Classifications

Location	Current Land Use	General Plan Land Use District	Zoning Classification
Site	Vacant undeveloped land	Low Density Residential (5 du/ac)	R-1T (Single Family Residential)
North	Eucalyptus Street followed by single-family residential development	Very Low Density Residential (2 du/ac)	R-1T (Single Family Residential)
South	Vacant undeveloped land	Low Density Residential (5 du/ac)	R-1T (Single Family Residential)
East	Vacant undeveloped land	Low Density Residential (5 du/ac)	R-1T (Single Family Residential)
West	Topaz Road (unimproved) followed by vacant undeveloped land	Commercial	C-2T (General Commercial)

Source: Field inspection, City of Victorville -General Plan Land Use & Zoning District Map, June 20, 2018, Google Earth Pro.

4.0-Environmental Analysis

The Project is evaluated based on its potential effect on twenty-one (21) environmental topics. Each of the above environmental topics are analyzed by responding to a series of questions pertaining to the impact of the Project on the particular topic. Based on the results of the Impact Analysis, the effects of the Project are then placed in one of the following four categories, which are each followed by a summary to substantiate the factual reasons why the impact was placed in a certain category.

Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Significant or Potentially significant impact(s) have been identified or anticipated that cannot be mitigated to a level of insignificance. An Environmental Impact Report must therefore be prepared.	Potentially significant impact(s) have been identified or anticipated, but mitigation is possible to reduce impact(s) to a less than significant category. Mitigation measures must then be identified.	No "significant" impact(s) identified or anticipated. Therefore, no mitigation is necessary.	No impact(s) identified or anticipated. Therefore, no mitigation is necessary.

4.1 Aesthetics

Threshold 4.1 (a). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Have a substantial adverse effect on a scenic vista?			■	

Impact Analysis

According to the General Plan EIR, surrounding areas of high aesthetic sensitivity that provide scenic vistas to the City of Victorville (but not located within the City) are the San Bernardino and San Gabriel Mountain ranges located approximately 14 miles to the south and Quartzite Mountain, located approximately 12 miles northeast from the Project site, respectively.[1]

[1] General Plan EIR, p. 5-11.

Areas of high visual sensitivity within/adjacent to the City include the Mojave River, the rocky bluffs of the Narrows, and the Mojave Narrows Regional Park.[2] From, the site, the Mojave River is located approximately 7 miles to the east and the rocky bluffs of the Narrows and the Mojave Narrows Regional Park are located approximately 7 miles to the northeast.

Impacts to scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Public views and vantage points from the Project site would be from the public-rights- of way of Eucalyptus Street, Topaz Road, and the internal public streets serving the Project. Development within a viewer's line of sight of scenic areas may interfere with a public view of a scenic vista, either by physically blocking or screening the vista from view, or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development; but would have those views blocked post development. Because of distance to these scenic resources and intervening development, distance, public views of these scenic vistas would not be blocked by the Project.

Level of Significance: **Less than significant.**

Threshold 4.1 (b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				■

Impact Analysis

According to the California Department of Transportation, the Project site is not located within a State scenic highway[3]. As such, there is no impact.

Level of Significance: **No impact.**

[2] City of Victorville General Plan

[3]California Department of Transportation, State Scenic Highway Program, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed April 5, 2021.

Threshold 4.1 (c). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
If located in an Urbanized Area, conflict with applicable zoning and other regulations governing scenic quality?			■	

Impact Analysis

According to US Census Bureau, the Project site is located in the Victorville Hesperia, CA Urbanized Area[4]. As such, the Project is subject to the City's applicable regulations governing scenic quality. Future construction of the residential structures and related improvements are subject to site plan review as required by Development Code Section 16-3.01.020 (c) and subject to the Single-Family Design Guidelines (Sec. 16-3.08.090). With implementation of above referenced Development Code requirements, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Level of Significance: **Less than significant.**

Threshold 4.1 (d). Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			■	

Outdoor Lighting and Glare

The Project would increase the amount of light in the area above what is being generated by the vacant site by directly adding new sources of illumination including security and decorative lighting for the proposed structures. All outdoor lighting is required to be designed and installed to comply with Development Code Section 16.3.08.090 (b) (3) (ix), *Lighting.*

Building Material Glare

Development Code Section 16.3.08.090 (d) (6) (i), *Style,* requires the key exterior architectural elements consist of non-reflective materials including stucco, horizontal siding and stone.

[4] United States Census Bureau, 2010 Census Urban Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua90541_victorville--hesperia_ca/DC10UA90541_001.pdf accessed April 2021.

Compliance with the above referenced Development Code requirements will ensure that the Project will not adversely affect day or nighttime views in the area.

Level of Significance: **Less than significant.**

4.2 Agriculture and Forestry Resources

Note: Because there are no forestry resources located in the City of Victorville, the topic of Forestry Resources is not addressed.

Threshold 4.2 (a) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program.[5]

Level of Significance: No impact.

Threshold 4.2 (b) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with existing zoning for agricultural use, or a Williamson Act contract?			■	

[5] https://databasin.org/maps/new/#datasets=b83ea1952fea44ac9fc62c60dd57fe48,accessed on March 6, 2-21.

Impact Analysis

Agricultural Zoning

The current zoning classification for the site is R1-T (Single-Family Residential) which is intended to promote protect established neighborhoods of single-family dwellings and to provide space for suitable locations for additional developments of this kind, with appropriate community facilities. Therefore, the Project would not conflict with existing zoning for agricultural use.

Williamson Act

A Williamson Act Contract enables private landowners to voluntarily enter contracts with local governments for the purpose of establishing agricultural preserves. According to County of San Bernardino Office of the Assessor the Project site is not within an agricultural preserve.[6]

Level of Significance: **No impact**.

Threshold 4.2 (c) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?				■

Impact Analysis

There is no land zoned as forest land or timberland located in the vicinity that may be affected by the development of the Project.

Level of Significance: **No impact**.

[6] https://sbcountyarc.org/wp-content/uploads/arcforms/NPP874-WilliamsonActParcels.pdf, accessed March 6, 2021.

Threshold 4.2 (d) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in the loss of forest land or conversion of forest land to non-forest use?				■

Impact Analysis

No forest land or timberland is located in the vicinity that may be affected by the development of the Project.

Level of Significance: **No impact**.

Threshold 4.2 (e) Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				■

Impact Analysis

As noted under Threshold 4.2 (a), the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. In addition, the site is not under agricultural production and there is no land being used primarily for agricultural purposes in the vicinity of the site.

Level of Significance: **No impact**.

4.3 Air Quality

The following analysis is based in part on the following:

- *Summary of CalEEMod Model Runs and Output for* VTM 20368, EPC Environmental, April 21, 2021, and is included as Technical Appendix A to this Initial Study.

- MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, February 2020,* available at: https://www.mdaqmd.ca.gov/rules/overview.

Air Quality Setting

Topography and Climate

The Project site is located within the Mojave Desert portion of the Mojave Desert Air Basin (MDAB) is bordered in the southwest by the San Bernardino Mountains, separated from the San Gabriel's by the Cajon Pass (4,200 ft). A lesser channel lies between the San Bernardino Mountains and the Little San Bernardino Mountains (the Morongo Valley). The MDAB is classified as a dry-hot desert (BWh), with portions classified as dry-very hot desert (BWhh), to indicate at least three months have maximum average temperatures over 100.4° F.[7]

Air Pollutants and Health Effects

Air Pollutants are the amounts of foreign and/or natural substances occurring in the atmosphere that may result in adverse effects to humans, animals, vegetation and/or materials. The Air Pollutants regulated by the MDAQMD that are applicable to the Project are described below.[8]

Carbon Monoxide (CO). A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. Carbon monoxide is harmful when breathed because it displaces oxygen in the blood and deprives the heart, brain and other vital organs of oxygen.

Nitrogen Dioxide NOx). Nitrogen dioxide (NO2) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO2, creating the mixture of NO and NO2 commonly called NOx. NOx can irritate eyes, nose, throat and lungs, possibly leading to coughing, shortness of breath, tiredness and nausea.

Particulate Matter ($PM_{2.5}$ and PM_{10}): One type of particulate matter is the soot seen in vehicle exhaust. Fine particles — less than one-tenth the diameter of a human hair — pose a serious threat to human health, as they can penetrate deep into the lungs. PM can be a primary pollutant

[7] MDAQMD CEQA Guidelines, February 2020, Page 6-7.
[8] http://www.aqmd.gov/home/air-quality

or a secondary pollutant from hydrocarbons, nitrogen oxides, and sulfur dioxides. Diesel exhaust is a major contributor to PM pollution.

Sulfur Dioxide (SO_2). A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO_2. Sulfur dioxide irritates the skin and mucous membranes of the eyes, nose, throat, and lungs.

Ozone: Ozone is formed when several gaseous pollutants react in the presence of sunlight. Most of these gases are emitted from vehicle tailpipe emissions. Ozone can reduce lung function worsen bronchitis, emphysema, and asthma.

Volatile Organic Compounds (VOCs): VOCs contribute to the formation of smog and/or may themselves be toxic. VOCs often have an odor and some examples include gasoline, alcohol and the solvents used in paints. Health effects may include eye, nose and throat irritation, headaches, loss of coordination, and nausea.

Non-attainment Designations and Classification Status

The United States Environmental Protection Agency and the California Air Resources Board have designated portions of the District non-attainment for a variety of pollutants. An "attainment" designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a "nonattainment" designation indicates that a criteria pollutant concentration has exceeded the established standard. Table 4.3-2 shows the attainment status of criteria pollutants in the MDAB.

Table 4.3-2- Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	No Standard
Ozone – 8-hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM_{10})	Nonattainment	Attainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (N0x)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO_2)	Unclassified /Attainment	Unclassified/Attainment
Lead	Attainment	Attainment

Source: California Air Resources Board, 2015.

As shown in Table 4.3-2 above, the MDAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, Respirable Particulate Matter (PM_{10}) and Fine Particulate Matter ($PM_{2.5}$)

Threshold 4.3 (a). Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with or obstruct implementation of the applicable air quality plan?			■	

Impact Analysis

The following analysis is consistent with the preferred analysis approach recommended by the MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines.*

Conformity with Air Quality Management Plans

The Project is located within the Mojave Desert Air Basin and under the jurisdiction of the Mojave Desert Air Quality Management District. Under the Federal Clean Air Act the Mojave Desert Air Quality Management District has adopted a variety of attainment plans (i.e. "Air Quality Management Plans") for a variety of non-attainment pollutants. A complete list of the various air quality management plans is available from the Mojave Desert Air Quality Management District located at 14306 Park Avenue, Victorville, CA 92392 or on their website at: https://www.mdaqmd.ca.gov/rules/overview.

The Mojave Desert Air Quality Management District is responsible for maintaining and ensuring compliance with the various Air Quality Management Plans. Conformity is determined based on the following criteria:

- □ A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project may also be non-conforming if it increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).

- □ A project is conforming if it complies with all applicable Mojave Desert Air Quality Management District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan).

Consistency with Emission Thresholds

As shown in Tables 4.3.5 and 4.3.6 below, the Project would not exceed Mojave Desert Air Quality Management District significance thresholds for any criteria pollutant during construction

or during long-term operation. Accordingly, the Project's air quality emissions are less than significant.

Consistency with Control Measures

The construction contractors are required to comply with rules, regulations, and control measures to control fugitive dust from grading (Rule 403) and the application of architectural coatings during building construction (Rule 1113).

Consistency with Growth Forecasts

The Project site is designated as R-1T (Single Family Residential) by the General Plan Land Use & Zoning Map. This land use designation is consistent with the land use plan that was used by the MDAQMD to generate the growth forecasts for the air quality plans referenced above.

Level of Significance: **Less than significant**.

Threshold 4.3 (b). Would the Project:	**Potentially Significant Impact**	**Less Than Significant Impact with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?			■	

Impact Analysis

The following provides an analysis based on the applicable regional significance thresholds established by the Mojave Desert Air Quality Management District in order to meet national and state air quality standards.

Table 4.3.2. MDAQMD Air Quality Significance Thresholds

Pollutant	**Daily Emissions (pounds/day)**
Carbon Monoxide (CO)	548
Oxides of Nitrogen (NOx)	137
Volatile Organic Compounds (VOC)	137
Oxides of Sulphur (SOx)	137
Particulate Matter (PM10)	82
Particulate Matter (PM 2.5)	65

Source: MDAQMD CEQA Guidelines, February 2020, Table 6.

Both construction and operational emissions for the Project were estimated based on a worst-case scenario of 65 dwelling units by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as California Environmental Quality Act (CEQA) documents and is authorized for use by the Mojave Desert Air Quality Management District.

Construction Emissions

Construction activities associated with the Project will result in emissions of CO, VOCs, NOx, SOx, PM10, and PM2.5. Construction related emissions are expected from the following onsite and offsite construction activities:

- Site Preparation 10 - days
- Grading 30 - days
- Building Construction 300 – days
- Architectural Coating 20 – days
- Paving 20-days

Construction activities produce combustion emissions from various sources (utility engines, tenant improvements, and motor vehicles transporting the construction crew). Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. Construction emissions are shown in Table 4.3.5 below.

Table 4.3.5. Construction Emissions

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
	59.60	127.77	36.01	0.06	9.76	6.28
Regional Threshold	**137**	**137**	**548**	**137**	**82**	**65**
Exceeds Regional Threshold?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: MDAQMD and CalEEMod 2016.3.2

Operational Emissions

The Project would be operated as a residential subdivision. Typical operational characteristics include residents and visitors traveling to and from the site, delivery of goods and services to the residents, and maintenance activities. Table 4.3-6 shows the Mojave Desert Air Quality Management District thresholds for operational emissions compared to the Project's maximum daily emissions.

Table 4.3.6. Operational Emissions

Maximum Daily Emissions	Emissions (pounds per day)					
	NOx	ROG	CO	SOx	PM10	PM2.5
	57.19	22.19	101.48	0.29	17.54	5.06
Regional Threshold	**137**	**137**	**548**	**137**	**82**	**65**
Exceeds Regional Threshold?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: MDAQMD and CalEEMod 2016.3.2 .

As shown in Table 4.367 above, operational related emissions would not exceed Mojave Desert Air Quality Management District thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during operation and would not contribute to an existing or projected air quality violation, on a direct or cumulative basis. As such, impacts are less than significant and no mitigation measures are required.

Level of Significance: **Less than significant.**

Threshold 4.3 (d). Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Expose sensitive receptors to substantial pollutant concentrations?				■

Impact Analysis

The Project is a residential subdivision and does not produce toxic air emissions such as those generated by industrial manufacturing uses or uses that generate heavy-duty diesel truck emissions. According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The nearest sensitive receptors are the residential neighborhood and the Sunset Ridge Park located approximately 100-feet north and 200- feet northeast of the Project site, respectively.

The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- □ Any industrial project within 1,000 feet;
- □ A distribution center (40 or more trucks per day) within 1,000 feet;
- □ A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- □ A dry cleaner using perchloroethylene within 500 feet; and,
- □ A gasoline dispensing facility within 300 feet.

The Project is a proposal to construct 65 single-family units. The Project does not meet the aforementioned criteria listed above. As a result, no impact will occur.

Level of Significance: **No impact.**

Threshold 4.3 (d). Would the Project	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			■	

Impact Analysis

Potential odor sources associated with t Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses.

The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required.

Level of Significance: **Less than significant.**

4.4 Biological Resources

The analysis in this section is based in part on the following technical reports*:*

- *General Biological Resources Assessment, Victorville, San Bernardino County, California (Township 4 North, Range 5 West, Section 11) APN: 0405-322-08; 0405-322-09,* RCA Associates, Inc., which is dated June 2, 2021, and is included as Appendix B to this Initial Study.

- *Protected Plant Preservation Plan APN: 0405-322-08 and 09 City of Victorville, California*, RCA Associates, Inc., which is dated May 27, 2021, and is included as Appendix C to this Initial Study.

Threshold 4.4 (a) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		■		

Impact Analysis

Plant Species

The property supports a creosote community consisting of Joshua trees *(Yucca brevifolia),* creosote bush *(Larrea tridentata),* rubber rabbitbrush *(Ericameria nauseosa),* Indian grass *(Sorghastrum nutans),* California buckwheat *(Eriogonum fasciculatum),* ketch grass *(Schismus barbatus),* Nevada joint fir *(Ephedra nevadensis),* and brome grasses *(Bromus sp.).* With the exception of the western Joshua Tree, there are no candidate, sensitive, or special status species located on the Project site.

Western Joshua Tree

Western Joshua tree became a candidate species under the California Endangered Species Act (CESA), effective October 9, 2020. The CESA prohibits the take and possession of any species, or any part or product of a species that is designated by the California Fish and Game Commission as an endangered, threatened, or candidate species. As a candidate species, western Joshua tree now has full protection under CESA and any take of the species (including removal of western Joshua tree or similar actions) will require authorization under CESA.

Development of the Project will result in the removal or relocation of western Joshua trees. Based on the results of the field investigations there are 105 western Joshua trees which occur within the boundaries of the property. Based on the evaluation and analysis of each tree it was determined that 22 of the 105 trees (21%) are suitable for transplanting. The remaining 83 Joshua trees (79%) were determined to be unsuitable for transplanting due to a variety of factors such as size, condition, damage, dying, excessive leaning, possibly disease, clonal, etc. and are proposed to be removed.

The factors utilized to determine which Joshua trees were suitable for transplanting include the following criteria:

1. Trees from about 1 foot in height up to approximately 12 feet,

2. No visible signs of damage to the tree such as absence of bark due to rodent or other animals,
3. Minimal number of branches (No more than 2 or 3 branches),
4. No excessive leaning of the tree,
5. No yellow or brown fronds,
6. Proximity to other Joshua trees (i.e., clonal), and
7. No exposed roots at the base of the tree.

The following mitigation measures apply to the removal or transplanting of any western Joshua trees.

Western Joshua Tree Mitigation Measures

Mitigation Measure BIO-1. Incidental Take Permit Required During Candidacy Period for Western Joshua Tree. *Any attempt to remove a western Joshua tree, dead or alive, from its current position will require an Incidental Take Permit (ITP) issued by the California Department of Fish and Wildlife (CDFW) until such time a final decision is made whether or not the species will be listed as threatened or endangered under the CESA. Should the CDFW determine that the western Joshua tree will be listed as threatened or endangered under the CESA and/or prior to their determination, an ITP will be required prior to any construction activities on the project site. Compensatory mitigation shall be per Mitigation Measure BIO-2.*

Mitigation Measure BIO-2. Incidental Take Permit Compensatory Mitigation for Western Joshua Tree Removal. *If an Incidental Take Permit (ITP) is required before or after the candidacy period, the compensatory mitigation ratio for impacts to western Joshua tree shall be determined by the functional quality of the habitat based on the size and reproductive class of trees within the Project impact area as confirmed in the Department-approved tree census report. The compensatory mitigation ratio for impacts to western Joshua tree shall be at a ratio of 1:1 of the project impact area unless a lesser ratio is approved by the CDFW through the Incidental Take Permit application process. To satisfy the compensatory mitigation requirement, prior to commencing any project activities on the project site, the Project Proponent shall pay a mitigation fee to be established by the CDFW in conjunction with the ITP. The fee accounts for biological monitoring, infrastructure, short- and long-term habitat maintenance, and reporting activities.*

Mitigation Measure BIO-3. Transplantation of Western Joshua Trees. *The following criteria will be utilized by the Project Proponent when conducting any future transplanting activities authorized by the CDFW in conjunction with an Incidental Take Permit, as required.*

A. The Joshua trees will be retained in place or replanted somewhere on the site where they can remain in perpetuity or will be transplanted to an off-site area approved by the City where they can remain in perpetuity. Joshua trees which are deemed not suitable for transplanting will be cut-up and discarded as per City requirements.

B. Earthen berms will be created around each tree by the biologist prior to excavation and the trees will be watered approximately one week before transplanting. Watering the trees prior to

excavation will help make excavation easier, ensure the root ball will hold together, and minimize stress to the tree.

C. Each tree will be moved to a City approved pre-selected location which has already been excavated and will be placed and oriented in the same direction as their original direction. The hole will be backfilled with native soil, and the transplanted tree will be immediately watered. The biologist will develop a watering regimen to ensure the survival of the transplanted trees. The watering regimen will be based upon the needs of the trees and the local precipitation.

Mitigation Measure BIO-4. Western Joshua Tree Protection During Construction/Operational Activities. *Any Western Joshua trees that are to remain located on-site shall be protected in place during all grading, construction and operational activities. A perimeter fence shall be constructed with a 25-to-50-foot minimum buffer around the trees in order to protect the trees, branches, roots, and the existing buffer around the trees and the existing established location. Additionally, any landscaping around the trees should be drought tolerant and native. No artificial irrigation will be needed and no runoff shall impact the trees.*

With implementation of Mitigation Measures BIO-1 through BIO-4, impacts would be less than significant relating to candidate, sensitive, or special status plant species.

Wildlife Species

Wildlife observed on the site or which are expected to inhabit the site include jackrabbits *(Lepus californicus),* desert cottontails *(Sylvilagus audubonii),* Antelope ground squirrel *(Ammospermophilus leucurus),* and California ground squirrel (*Otospermophilus beecheyi).* Coyote (*Canis la trans)* dens and scat were observed on site, indicating coyotes utilize the site during hunting activities. Birds observed included ravens *(Corvus corax),* house finch *(Carpodacus mexicanus),* cactus wren *(Campylorhynchus brunneicapillus),* Anna's hummingbird *(Calypte anna),* greater roadrunner *(Geococcyx californianus),* black-chinned sparrow *(Spizella atrogularis),* and mourning dove *(Zenaida macroura).* Reptiles observed during the survey include desert spiny lizard *(Sceloporus magister),* and western whiptail lizard *(Cnemidophorus tigris).*

Protocol surveys were conducted for the desert tortoise and burrowing owl as per agency requirements, and a habitat assessment was performed for the Mohave ground squirrel. The results of the surveys for Desert Tortoise, Burrowing Owl, and Mojave Ground Squirrel are summarized below.

Desert Tortoise

No tortoise sign was identified on the site or zone of influence. The species is not expected to move onto the site in the near future based on the absence of any sign, absence of any recent observations in the immediate area, and the presence of busy roadways and developments in the immediate area which may act as barriers to migration of tortoises.

Burrowing Owl

The site does support suitable habitat for the burrowing owl. No owls were observed during the field investigations, and there were no owls sign (i.e., whitewash, feathers, or castings) in the immediate vicinity of the few suitable burrows observed on the site.

Mojave Ground Squirrel

The habitat is not prime Mohave ground squirrel habitat and due to the low population levels and no recent observations in this area of the Mojave Desert, the likelihood of Mohave ground squirrels occurring on the proposed project site is very low for the following reasons:

1. Small size (18-acres);
2. No recent documented observations in the general region; and
3. No connectivity with habitat which may support the species.

Table 4.4.1. *Presence of Candidate, Sensitive, or Special Status Wildlife Species*, provides a summary of all wildlife species that may be located in the Project area.

Table 4.4.1. Presence of Candidate, Sensitive, or Special Status Wildlife Species

Species	Status
Desert Tortoise	**Future Presence Possible:** The property supports very marginal habitat for the desert tortoise based on the location of the site in a developed area of Victorville. No tortoises or tortoise sign (burrows, scats, etc.) were observed anywhere within the property boundaries. Therefore, Mitigation Measure BIO-6. *30-day Pre-Construction Desert Tortoise Survey* is required.
Mohave Ground Squirrel	**Not Present:** The habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the small size of the site, no recent documented observations in the general region; and no connectivity with habitat which may support the species.
Yellow warbler	**Not Present.** There is no habitat that the supports yellow warbler on the site.
Cooper's hawk	**Not Present.** Cooper's hawk has not been observed in the area recently and the species is expected to infrequently use the site for hunting.
Coast horned lizard	**Not Present**: The use of the site by coast homed lizards may be very infrequent given the low population levels in the region as well as the lack of any recent sightings.
Pallid bat .	**Not Present.** The habitat that the bat would use is not present.

Species	Status
Long-eared owl	**Not Present.** The species is expected to infrequently use the site for hunting due to its proximity to a major roadway.
Le Conte's thrasher	**Not Present**. The use of the site by thrashers may be very infrequent given the low population levels in the region as well as the lack of any recent sightings.
Grev vireo	**Not Present.** The use of the site by grey vireo may be very infrequent given the low population levels in the region as well as the lack of any recent sightings
Burrowing Owl	**Future Presence Possible.** No owls or owl sign (whitewash, etc.) were seen on the property during the survey. There is a possibility of owls moving onto this site in the future based on the presence of suitable burrows for utilization. Therefore, Mitigation Measure BIO-5. *30-day Pre-Construction Burrowing Owl Survey* is required.

Wildlife Species Mitigation Measures

As noted above, no wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service were detected on-site. However, both the Burrowing Owl and the Desert Tortoise species are known to potentially be located within the area and due to their transient nature, have the potential to inhabit the site in the future. Therefore, the following mitigation measures have been included in order to ensure any impacts are less than significant to the Burrowing Owl and Desert Tortoise.

Mitigation Measure BIO-5. Burrowing Owl Pre-Construction Surveys. *Prior to the issuance of a grading permit, pre-construction surveys for Burrowing Owls on the project site and in the surrounding area in accordance with California Department of Fish and Wildlife (CDFW) approved protocols shall be conducted no more than 30-days prior to ground disturbing activities in accordance with best practices identified by the California Department of Fish and Wildlife. If ground disturbing activities are delayed for more than 30-days (including the restarting of activities after project/ground disturbing delays of 30- days or more), additional surveys will be required. If burrowing owls are observed on the project site during future surveys the California Department of Fish and Wildlife shall be immediately notified and mitigation measures shall be required to reduce impacts to less than significant, as approved by the CDFW. Acceptable mitigation measures are described in the Staff Report on Burrowing Owl Mitigation State of California Natural Resources Agency, Department of Fish and Game, March 7, 2012.*

Mitigation Measure BIO-6. Pre-Construction Desert Tortoise Surveys. *No more than 30 calendar days prior to start of Project Activities a qualified biologist shall conduct pre-construction surveys*

for desert tortoise. Pre-construction surveys shall be completed using perpendicular survey routes within the Project Area and 50-foot buffer zone. Pre-construction surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project Activities cannot start until 2 negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Should desert tortoise presence be confirmed during the survey, all desert tortoises encountered during clearance surveys and subsequent monitoring efforts will be permanently removed from the project area and translocated to an off-site recipient site. The Project Proponent shall prepare a site-specific Desert Tortoise Translocation Plan that will provide details on the proposed recipient site, desert tortoise clearance surveys and relocation, definitions for Authorized Biologists and qualified desert tortoise biologists, exclusion fencing guidelines, protocols for managing desert tortoise found during active versus inactive seasons, protocols for incidental tortoise death or injury, and will be consistent with project permits and current USFWS guidelines. The Plan will also include a requirement for communication and coordination with the BLM regarding the desert tortoise recipient site. Prior to construction and the removal of any Desert Tortoises, the Plan will be subject to the approval of the CDFW and the USFWS. Impacts shall be offset through acquisition of compensatory land within suitable and occupied desert tortoise habitat and/or monetary contributions to other recovery efforts in the West Mojave habitat mitigated for at a ratio of 1:1. Final mitigation acreage are subject to the approval of the applicable state and federal wildlife agencies.

With implementation of Mitigation Measures BIO-5 and BIO-6, impacts would be less than significant relating to candidate, sensitive, or special status wildlife species.

General Biological Resource Mitigation Measures

Mitigation Measure BIO-7. Worker Awareness Program. *Prior to the start of construction, a Worker Environmental Awareness Program (WEAP) will be developed by the Project Proponent. A qualified biologist with experience with the sensitive biological resources in the region will present the WEAP to all personnel working in the project area (either temporarily or permanently) prior to the start of project activities. The WEAP may be videotaped and used to train newly hired workers or those not present for the initial WEAP. The WEAP could include, but will not be limited to discussions of the sensitive biological resources associated with the project, project-specific measures to avoid or eliminate impacts to these resources, consequences for not complying with project permits and agreements, and contact information for the lead biologist. Logs of personnel who have taken the training will be kept on the site at the construction or project office.*

Mitigation Measure BIO-8. Qualified Biologist On-Site. *Unless determined to be unnecessary by the project biologist, the applicant/developer shall provide a qualified biologist on-site prior to and during all ground and habitat disturbing activities to move out of harm's way wildlife that would otherwise be injured or killed from related project activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should only be moved as far as necessary to ensure their safety. Measures to prevent wildlife from re-entering the site should also be taken. Only qualified biologists with authorization by CDFW may move CESA-listed species.*

Additionally, in order to ensure the mitigation measures proposed are valid in accordance with current site conditions and that no additional mitigation measures are needed, the following mitigation measure has been included. Mitigation Measure:

Mitigation Measure BIO-9. Expiration of Biological Resources Assessments. *The General Biological Resources Assessment, Victorville, San Bernardino County, California (Township 4 North, Range 5 West, Section 11) APN: 0405-322-08; 0405-322-09, RCA Associates, Inc., dated June 2,2021 and the Protected Plant Preservation Plan, APN: 0405-322-08 and 09 City of Victorville, California, RCA Associates, Inc., dated May 27, 2021, are valid for one (1) year. Should ground disturbing activities commence after these dates, updated biological surveys shall be filed with the City of Victorville to determine the presence or absence of endangered species, threatened species, candidate species, Species of Special Concern, and fully protected species on the site and to ensure appropriate mitigation measures are maintained.*

Level of Significance: **Less than significant** with implementation of Mitigation Measures BIO-1 through BIO-9**.**

Threshold 4.4 (b). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				■

Impact Analysis

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats.

Level of Significance: **No impact**.

Threshold 4.4 (c) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The following sources were reviewed to determine the potential presence or absence of jurisdictional streams/drainages, wetlands, and their location within the watersheds associated with the Project site, and other features that might contribute to federal or state jurisdictional authority located within watersheds associated with the Project site:

- □ National Wetlands Inventory (NWI) maps (USFWS 2018b). The NWI database indicates potential wetland areas based on changes in vegetation patterns as observed from satellite imagery. This database is used as a preliminary indicator of wetland habitats because the satellite data are not precise;
- □ USGS National Hydrography Dataset (NHD) provides the locations of "blue-line" streams as mapped on 7.5-Minute Topographic Map coverage;
- □ Aerial Imagery (Google Earth) (Google 2021);
- □ USGS 7.5-Minute Topographic Maps; and
- □ Natural Resources Conservation Service (NRCS) Soil Survey.

All areas with potential depressions or drainages were evaluated for the presence of jurisdictional waters, including jurisdictional wetlands. Each area was inspected according to the USACE delineation guidelines, streambeds/riparian/wetland boundaries of CDFW and RWQCB, and riparian/riverine areas and vernal pools. Any drainages encountered were also examined for connectivity or lack of connectivity to other hydrologic features. Dominant vegetation within the drainages or adjacent to the drainages were identified and recorded. Other references used to determine jurisdictional areas included vegetation and topographic maps of the Project site and a recent aerial photograph.

No jurisdictional non-wetland Waters of the U.S. are present on the Project site nor were any jurisdictional riparian waters of the State or streambed waters of the State observed on the site. The small drainage swales on the site were determined to not be within USACE jurisdiction due

to the lack of connectivity to adjacent jurisdictional features and the lack of wetlands. All jurisdictional Waters of the U.S. under the jurisdiction of the USACE and RWQCB, Waters of the State under the jurisdiction of CDFW and RWQCB, that are present in the surrounding region will not be directly impacted by the proposed project. To avoid indirect impacts to jurisdictional waters during construction, standard BMPs will be implemented. To prevent direct and indirect impacts to jurisdictional waters post-construction, features to protect water quality such as the installation of a storm drain system and a water quality basin will be implemented.

Level of Significance: **No impact.**

Threshold 4.4 (d). Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?		■		

Impact Analysis

The Project Site is bordered by Eucalyptus Street and residential development to the north. As such, the Project does not serve as a wildlife travel route, crossing or regional movement corridor between large open space habitats.

However, the site supports limited nesting opportunities for common migratory bird species. All migratory bird species, whether listed or not, also receive protection under the Migratory Bird Treaty Act (MBTA) of 1918[9]. The MBTA prohibits individuals to kill, take, possess, or sell any migratory bird, bird parts (including nests and eggs) except per regulations prescribed by the Secretary of the Department (16 U. S. Code 7034).

Therefore, if vegetation is to be removed during the nesting season, a pre-construction nesting bird survey shall be conducted, and avoidance measures taken to ensure that no take of birds or their nests will occur.

Mitigation Measure

Mitigation Measure BIO-10. Nesting Bird Survey. *All Project activities on-site shall be conducted outside of nesting season {January 15 to August 31} to the maximum extent feasible. During the nesting bird season, a qualified biologist shall conduct pre-project nesting bird surveys, implement*

[9] United States Fish and Wildlife Service, Migratory Bird Treaty Act, August 8, 2017, Available at: https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php

nest buffers, and conduct monitoring at all active nests within the work area and surrounding 300-foot buffer. Nesting bird surveys shall be conducted by a qualified biologist within 300 feet of all work areas, no more than 3 days prior to commencement of project activities. If active nests containing eggs or young are found, a qualified biologist shall establish an appropriate nest buffer. Nest buffers are species-specific and range from 15 to 100 feet for passerines and 50 to 300 feet for raptors, depending on the planned activity's level of disturbance, site conditions, and the observed bird behavior. Established buffers shall remain until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests shall be monitored until the biologist has determined the young have fledged or the project is finished*. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.*

Level of Significance: With implementation of Mitigation Measure BIO-10, impacts would be **less than significant.**

Threshold 4.4 (e) Would the Project:	**Potentially Significant or Significant Impact**	**Less Than Significant Impact with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				■

Impact Analysis

Other than Joshua Tree, which is discussed under Threshold 4.4 (a), there are no trees on the Project site.

Level of Significance: **No Impact**.

Threshold 4.4 (f) Would the project:	**Potentially Significant or Significant Impact**	**Less Than Significant Impact with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				■

Impact Analysis

According to the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife Department, there are no habitat conservation plans that encompass the Project site.[10]

Level of Significance: **No Impact**.

4.5 Cultural Resources

The analysis in this section is based in part on the following technical report*: Cultural Resources Assessment, APN 0405-322-08 & 0405-322-09 Project, Victorville, San Bernardino County, California*, BCR Consulting, LLC, which is dated February 19, 2021, and is included as Technical Appendix D to this Initial Study.

Threshold 4.5 (a)	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?				■

Impact Analysis

Records Search

Data from the South-Central Coastal Information Center (SCCIC) revealed 24 previous cultural resource studies have taken place, and 18 cultural resources have been identified within one mile of the Project site. Two of the previous studies have assessed the Project site and no cultural resources were identified within its boundaries.

Field Survey

During the field survey, no historic-period cultural resources of any kind were found within the Project site boundaries. The Project has been subject to severe artificial disturbances associated with modern refuse dumping and adjacent street, sidewalk, and residential property construction. Most of the project site is covered with old alluvium, and a small portion in the southeastern corner contains more recent alluvium associated with the flooding of the adjacent Oro Grande Wash.

Level of Significance: No impact**.**

Threshold 4.5 (b)	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?		■		

Impact Analysis

Archaeological Setting

Although no archaeological resources were found during the field survey, ground-disturbing activities have the potential to reveal buried deposits not observed on the surface. Therefore, the following mitigation measure is recommended:

Mitigation Measure(s)

CR-1: Archaeological Inadvertent Discovery. *Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: If archaeological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. The Project Archaeologist shall be notified and will be allowed to temporarily divert or redirect grading or excavation activities in the vicinity to make an evaluation of the find. If the resource is significant, Mitigation Measure CR-2 shall apply.*

CR-2: Archeological Treatment Plan. *Prior to the issuance of a grading permit, the following note shall be placed on the grading plan: If a significant archaeological resource(s) is discovered on the property, ground disturbing activities shall be suspended 100 feet around the resource(s). The Project Archaeologist, the Project Proponent, and the City Planning Department shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The treatment plan shall contain a research design and data recovery program necessary to document the size and content of the discovery such that the resource(s) can be evaluated for significance under CEQA criteria. The research design shall list the sampling procedures appropriate to exhaust the research potential of the archaeological resource(s) in accordance with current professional archaeology standards (typically this sampling level is two (2) to five (5) percent of the volume of the cultural deposit). At the completion of the laboratory analysis, any recovered archaeological resources shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility. A final report containing the significance and treatment*

findings shall be prepared by the archaeologist and submitted to the City of Victorville Planning Department and the South-Central Coastal Information Center.

Level of Significance: With implementation of Mitigation Measures CR-1 and CR-2, impacts are **less than significant.**

Threshold 4.5 (c) Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Disturb any human remains, including those interred outside of formal cemeteries?			■	

Impact Analysis

The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. If human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et. seq.

Level of Significance: With implementation of the California Health and Safety Code, impacts would be **less than significant**.

4.6 Energy

Threshold 4.6 (a) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			■	

Impact Analysis

Construction Energy Analysis

Construction of the Project would require the use of fuel and electric powered equipment and vehicles for construction activities. The majority of activities would use fuel powered equipment and vehicles that would consume gasoline or diesel fuel. Heavy construction equipment (e.g. dozers, graders, backhoes, dump trucks) would be diesel powered, while smaller construction vehicles, such as pick-up trucks and personal vehicles used by workers would be gasoline powered. The majority of electricity use would be from power tools. The anticipated construction schedule assumes the Project would be built-out in approximately 12 months. Table 4.6.1 below shows an estimate for energy consumption during the construction phase.

Table 4.6.1. Energy Consumption Estimate for Project Construction.

Construction Phase	Number of Construction Days	Average Worker and Vendor Trips Per Day	Horse Power Hours per Construction Phase	Construction Equipment		Worker and Vendor Trips
				Energy Use (1)	Gas & Fuel Use (2)	Gas & Fuel Use (3)
Site Preparation	10	18	90,320		4,882	198
Grading	30	20	402,702		21,768	659
Building Const., Paving, Architectural Coating.	300,20,20	30,15,5	2,167,800		117,178	10,323
			TOTALS	**503.88 kWh**	**143,828 Gal.**	**11,180 Gal.**

1: Calculation is based on an average construction energy cost of $2.28 per month of energy use per 1,000 square feet of building space (162,500s.f.) over the total duration of construction (17- months), at the rate of 8 cents per kilowatt hour (kWh).
2: Calculation is based on expected horsepower (HP) hours and an average factor of 1 gallon of fuel per 18.5 horsepower-hour.
3: Calculation is based on number of expected worker and vendor trips per day, multiplied by an average trip length of 14.7 miles and based on the average fuel economy of a light duty automobile of 26.77 miles per gallon.
4. This calculation overstates the HP hours per construction phase because it does not apply a load factor.

The consumption of energy would be temporary in nature and would not represent a significant demand on available supplies. Given the physical characteristics of the site and the type of development proposed, there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

In addition, as required by state law[11], idling times of construction vehicles is limited to no more than five minutes, thereby minimizing, or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Operation Energy Analysis

Energy consumption in support of or related to Project operations would include transportation energy demands and operational energy demands.

Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total vehicles miles traveled (VMT) and estimated vehicle fuel economies of vehicles accessing the Project site. The Project will result in 1,744,016 annual VMT and an estimated annual fuel consumption of 54,500 gallons of fuel.[12]

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operational Energy Demands

Occupancy of the single-family residences would result in the consumption of natural gas and electricity. Energy demands are estimated at 1,988 kBTU/year of natural gas and 566,571 kWh/year of electricity[13]. Natural gas would be supplied to the Project by Southwest Gas Corporation and electricity would be supplied by SCE. The Project proposes single-family homes reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other single-family land use projects of similar scale and configuration. Lastly, the Project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

Level of Significance: **Less than significant**.

[11] *California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) Idling*.
[12] Appendix A, *CalEEMod Outputs.*
[13] Appendix A, *CalEEMod Outputs.*

Threshold 4.6(b). Would the Project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			■	

Impact Analysis

The regulations directly applicable to the Project are *Building Energy Efficiency Standards*, Title 24, Part 6, and *CALGreen* Title 24, Part 11. These regulations include, but are not limited to the use of energy efficient heating and cooling systems, water conserving plumbing and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process.

Level of Significance: **Less than significant.**

4.7 Geology And Soils

Threshold 4.7(a). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				■

Impact Analysis

According to the California Department of Conservation, there are no known or suspected Alquist-Priolo Earthquake Fault zones within the City.[14]

Level of Significance: **No impact.**

[14] https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed March 15,2021.

Threshold 4.7(a1). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Strong seismic ground shaking?			■	

Impact Analysis

As a mandatory condition of Project approval, the Project would be required to comply with the seismic design criteria mandated by Development Code *Title 16, Chapter 5, Building and Fire Regulations, Article 4, Residential Code.*

Level of Significance: **Less than significant**.

Threshold 4.7(a2). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Seismic-related ground failure, including liquefaction?			■	

Impact Analysis

According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp), the Project site is not located in a liquefaction zone.[15] Notwithstanding, the Project would be required to comply with Development Code Section 16-5.02.060 (b) (2), *Soils Engineering Report*, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Level of Significance: **Less than significant**.

Threshold 4.7(a3). Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Landslides?				■

[15] https://maps.conservation.ca.gov/geologichazards/#dataviewer, accessed March 15,2021.

Impact Analysis

The site is relatively flat and is not adjacent top any slopes or hillsides that could be potentially susceptible to landslides.

Level of Significance: **No Impact**.

Threshold 4.7(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in substantial soil erosion or the loss of topsoil?			■	

Impact Analysis

Construction

Grading and construction activities would expose and loosen topsoil, which could result in soil erosion. The City has several Development Code requirements to manage soil erosion as indicated below.

- Section 10.30.210 - *Erosion and Sediment Control Plan* ("ESCP")
- Section 16-5.02.060 (4),*Wind Generated Soil Erosion*,
- Section 16-4.12.020: - *Erosion Control*
- Section 17.88.010 - *Grading and Erosion Control*.

Through compliance with the Development Code, construction impacts related to erosion and loss of topsoil would be less than significant.

Operation

The proposed Project includes installation of landscaping throughout the Project site and areas of loose topsoil that could erode by wind or water would not exist upon operation of the Project. The basin will reduce the potential for stormwater to erode topsoil downstream.

Level of Significance: **Less than significant**.

Threshold 4.7(c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?			■	

Impact Analysis

Landslides, lateral spreading, subsidence, liquefaction, and collapse as a result of an earthquake are largely dependent on the underlying geologic conditions (e.g. bedrock, type of soil, and the depth of the water table). The site is composed Cajon Sand which consists of very deep, somewhat excessively drained soils that formed in sandy alluvium from dominantly granitic rocks.

Level of Significance: **Less than significant**.

Threshold 4.7(d) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?			■	

Impact Analysis

The soil on the project site consists of Cajon Sand. The Cajon series consists of very deep, somewhat excessively drained soils that formed in sandy alluvium from dominantly granitic rocks.[16] Cajon Sand is not a clay soil and is generally not susceptible to expansion. Notwithstanding, the Project would be required to comply with Development Code Section 16-5.02.060 (b) (2), *Soils Engineering Report*, which includes data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures and other data required by the Building Official.

Level of Significance: **Less than significant.**

[16] https://soilseries.sc.egov.usda.gov/osdname.aspx, accessed on March 21, 2021.

Threshold 4.7(e) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Project does not propose the use of septic tanks or alternative wastewater disposal systems. The Project would install domestic sewer infrastructure and connect to the City of Victorville's sewer conveyance and treatment system.

Level of Significance: No impact.

Threshold 4.7(f) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		■		

Impact Analysis

General Plan Figure 5.5-5 *Sensitivity Assessment for Paleontological Resources,* indicates that the site has a low sensitivity for containing paleontological resources. Low sensitivity geologic units are assigned to this category when few significant nonrenewable vertebrate, invertebrate, or plant fossils have been recovered from the same unit nearby.[17]

However, because paleontological resources have been known to be encountered in the Victorville area, the following mitigation measure is required for the inadvertent discovery of paleontological resources that may be encountered during grading.

Mitigation Measures

GEO-1: Inadvertent Discovery of Paleontological Resources. *If paleontological resources are encountered during implementation of the Project, ground-disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist (the "Project*

[17] Ibid.

Paleontologist") shall be retained by the developer to make an evaluation of the find. If the resource is significant, Mitigation Measure GEO-2 shall apply.

GEO-2: Paleontological Treatment Plan. *If a significant paleontological resource(s) is discovered on the property, in consultation with the Project proponent and the City, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.*

With implementation of Mitigation Measures GEO-1 and GEO-2, impacts are less than significant with regard to paleontological resources.

Unique Geologic Feature

The Project site is relatively flat. The site soils generally consist of Cajon Sand which is a common soil type in Victorville. As such, the Project does not contain a geologic feature that is unique or exclusive locally or regionally.

Level of Significance: **Less than significant** with mitigation incorporated for paleontological resources.

4.8 Greenhouse Gas Emissions

The following documents were used in the preparation of this analysis:

- *City of Victorville Climate Action Plan*, September 2015.
- Mojave Desert Air Quality Management District, *California Environmental Quality Act (CEQA) And Federal Conformity Guidelines,* February 2020.

Threshold 4.8 (a-b) Would the Project:	**Potentially Significant or Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			■	

Impact Analysis

City of Victorville Climate Action Plan

The City of Victorville has adopted a Climate Action Plan (CAP) to demonstrate how the City will reduce its GHG emissions in compliance with AB32. The CAP is a document that specifically demonstrate how the City will reduce GHGs in compliance with AB32. The CAP involves both existing and new construction within the City and across all industries including residential, commercial, industrial, municipal (public) and institutional.

The CAP allows for the streamlining of projects by allowing developers to demonstrate that their projects are consistent with the CAP through a screening table process which allows the applicant to choose any of a number of reduction measures. For a project to meet the GHG reduction goal through the screening tables, 45 points must be achieved. The applicant submitted a GHG Emissions Screening Table and achieved 70 points. As such, the Project is in compliance with the CAP. (See Appendix E).

Mojave Desert Air Quality Management District Thresholds of Significance

The Mojave Desert Air Quality Management District (MDAQMD) has established GHG significance thresholds of 100,000 tons on an annual basis for this type of project. A summary of the projected annual operational greenhouse gas emissions, including amortized construction-related emissions associated with the development of the Project is provided in Table 4.8-1.

Table 4.8.1. Project Greenhouse Gas Emissions

Source		GHG Emissions MT/yr		
	N2O	CO2	CH4	CO2e
Mobile Sources	0.000	973.50	0.074	975.35
Area	0.005	96.01	0.063	99.32
Energy	0.0035	286.65	0.009	287.93
Solid Waste	0.000	15.48	0.091	38.35
Water/Wastewater	0.003	28.36	0.14	32.88
30-year Amortized Construction GHG				10.17
TOTAL				*1,444.00*
MDAQMD Threshold				**100,000**
Exceed Threshold?				**NO**

Source: Summary of CalEEMod Model Runs and Output (Appendix A).

As shown on Table 4.8-1, the Project has the potential to generate a total of approximately 1,440 $MTCO_2e$ per year. As such, the Project would not exceed the MDAQMD's significance threshold of 100,000 $MTCO_2e$. Thus, Project-related emissions would not have a significant direct

or indirect impact on greenhouse gas emissions that could impact climate change and no mitigation or further analysis is required.

Level of Significance: **Less than significant.**

4.9 - Hazards And Hazardous Materials

Threshold 4.9(a) (b)	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			■	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			■	

Impact Analysis

Existing Conditions

The Project site has been subject to severe artificial disturbances associated with modern refuse dumping and adjacent street, sidewalk, and residential property construction. Most of the Project site is covered with old alluvium, and a small portion in the southeastern corner contains more recent alluvium associated with the flooding of the adjacent Oro Grande Wash.

There have been no previous activities, including agricultural production, that could result in the release of surface or subsurface hazardous materials during the construction phase of the Project.

Construction Activities

Construction contractors are required to comply with all applicable federal, state, and local laws and regulations regarding hazardous materials, including but not limited requirements imposed by the Environmental Protection Agency, California Department of Toxic Substances Control, Mojave Desert Air Quality Management District, and the Lahontan Regional Water Quality Control Board. As such, impacts due to construction activities would not cause a significant hazard to the public or the environment through the release of hazardous materials to the environment.

Operational Activities

The Project site would be developed with residential land uses which is a land use not typically associated with the transport, use, or disposal of hazardous materials. Although residential land uses may utilize household products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the Project site.

Level of Significance: **Less than significant**.

Threshold 4.9 (c) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			■	

Impact Analysis

The Project site is located slightly over 0.25 miles (0.38 miles) from Hollyvale Elementary School. Although not within 0.25 miles of the school, as discussed in the responses to Thresholds 4.9 (a) and 4.9 (b) above, all hazardous or potentially hazardous materials would comply with all applicable federal, State, and local agencies and regulations with respect to hazardous materials. Therefore, regardless of the proximity of planned or proposed schools, the Project will not impact schools.

Level of Significance: **Less than significant**.

Threshold 4.9 (d) Would the Project	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State and local agencies to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites pursuant to Government Code Section 65962.5. Below are the data resources that provide information regarding the facilities or sites identified as meeting the Cortese List requirements, Based on a review of the Cortese List maintained by the California Environmental Protection Agency the Project site is not identified on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. [18]

Level of Significance: **No impact.**

Threshold 4.9 (e) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Project site is located not located within an airport land use plan[19]. The nearest airports from the site are Hesperia Airport located approximately 6 miles southeast and the Southern California Logistics Airport approximately 8 miles north.

Level of Significance: **No impact**.

Threshold 4.9 (f) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			■	

[18] California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/sitecleanup/corteselist/ , accessed August 20, 2020.
[19] https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx, accessed on April 25, 2021.

Impact Analysis

Access to the Project site is proposed from Eucalyptus Street and Topaz Road. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles from Eucalyptus Street and Topaz Road.

Level of Significance: **Less than significant**.

Threshold 4.9 (g) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				■

Impact Analysis

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area[20]. Also refer to analysis under Section 4.20, *Wildfire*.

Level of Significance: **No impact**.

4.10 Hydrology And Water Quality

The following analysis is based in part on the following technical report: Preliminary Drainage Report For Tentative Tract Map No. 20368 Victorville, CA, United Engineering Group, December 2020, and is included as Appendix F of this Initial Study.

Threshold 4.10 (a) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			■	

[20] https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed on April 25, 2021.

Impact Analysis

Construction Impacts (Water Quality Standards)

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction activities in the absence of any protective or avoidance measures.

Victorville Municipal Code (V.M.C.) *Chapter 10.30 - Storm Water and Urban Runoff Management and Discharge Control*, requires the Project to obtain a National Pollutant Discharge Elimination System Municipal Stormwater Permit for construction activities. The permit is required for all Projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area.

Compliance with the permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan for construction-related activities, including grading. The plan would specify the measures that would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the site.

Operational Impacts (Water Quality Requirements)

Storm water pollutants commonly associated with the type of land uses that could occupy the proposed structures include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. V.M.C. *Chapter 10.30 - Storm Water and Urban Runoff Management and Discharge Control*, requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of storm water or urban runoff that flows from a developed site after construction is completed and the facilities or structures are occupied and/or operational. The Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin, designed for stormwater treatment through infiltration provided at the bottom of the basin, where the required volume will infiltrate through the site soils and into the groundwater, before discharging to the existing storm drain in Eucalyptus Street.

Waste Discharge Requirements

Waste Discharge Requirements are issued by the Lahontan Regional Board under the provisions of the California Water Code, Division 7 “Water Quality,” Article 4 “Waste Discharge

Requirements."[21] These requirements regulate the discharge of wastes which are not made to surface waters, but which may impact the region's water quality by affecting underlying groundwater basins. Discharge requirements are issued for Publicly Owned Treatment Works' wastewater reclamation operations, discharges of wastes from industries, subsurface waste discharges such as septic systems, sanitary landfills, dairies, and a variety of other activities which can affect water quality.

Operational Impacts (Waste Discharge Requirements)

To facilitate proper funding and management of sanitary sewer systems, the City implements SWRCB Order No. 2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. On July 30, 2013, Attachment A to the Order was promulgated and became effective on September 9, 2013, and is known as Attachment A, SWRCB Order No. WQO 2013-0058-EXEC, amending the Monitoring and Reporting Program for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (together these documents constitute the "SSS WDR") for the operation of the City's sewer system. This permit, among other things, requires local public sewer collection system agencies, referred to as "Enrollees," to develop a Sewer System Management Plan ("SSMP").

The *City of Victorville 2019 SSMP Sewer System Management Plan Update, May 20, 2019,* includes provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems. Additionally, the SSMP contains a spill response plan that establishes standard procedures for immediate response to a sanitary sewer overflow in a manner designed to minimize water quality impacts and potential nuisance conditions. The Project's impacts to waste discharge requirements will managed by connecting to the City's sewer system. Therefore, the Project will not violate any waste discharge requirements.

Level of Significance: **Less than significant.**

Threshold 4.10 (b) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			■	

[21] California Water Boards, *Waste Discharge Requirements Program*, July 3, 2020. Available at: https://www.waterboards.ca.gov/water_issues/programs/waste_discharge_requirements/

Impact Analysis

Groundwater Supplies

The source of potable water supply for the Victorville Water District (VWD) is from groundwater. VWD has groundwater wells within its distribution system that are actively used to pump groundwater from the Mojave River Groundwater Basin, which lies beneath Victor Valley.[22] A discussion of overall water supplies can be found in Section, 4.19 *Utilities and Service Systems*, of this Initial Study.

Groundwater Recharge

The Project proposes to use roads within the Project site to carry runoff to a proposed water quality basin, designed for both retention and detention, before discharging to the existing storm drain in Eucalyptus Street. As such, the Project will not interfere substantially with groundwater recharge.

Sustainable Groundwater Management

The City of Victorville is located within the Upper Mojave River Valley portion of the Mojave River Basin. The Mojave River is an adjudicated basin (i.e. water rights are determined by court order).[23] Adjudicated basins are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of the Basin. No component of the Project would obstruct with or prevent implementation of the management plan for the Basin. As such, the Project would not conflict with any sustainable groundwater management plan. Impacts would be less than significant

Level of Significance. **Less than significant**.

Threshold 4.10 (c). Would the Project:	**Potentially Significant or Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 that would:				
(i) Result in substantial erosion or siltation on- or off-site?			■	

[22] *Victorville Urban Water Management Plan*, June 6, 2016, p. 23, accessed on April 25, 2021.

[23] https://gis.water.ca.gov/app/bp-dashboard/final/, accessed on April 25, 2021./

Threshold 4.10 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			■	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			■	
(iv) Impede or redirect flood flows?			■	

Impact Analysis

Existing Condition

The Project site is vacant, undeveloped and undisturbed land with uniform slope of approximately 1.7 percent. The runoff from the subject site is primarily sheet flow. The site drains northeasterly to Eucalyptus Street where it continues easterly into an existing City Storm drain inlet along the north side of Eucalyptus Street.

Proposed Condition

The proposed condition is to use a basin for water quality and flood routing to manage the Project runoff. Post development runoff will be conveyed by the internal street system and then routed through the proposed basin before discharging into the existing storm drain in Eucalyptus Street. The basin is designed with a sufficient size to handle water quality through infiltration, and flood mitigation through detention.

As proposed, the design of the storm drain system manage runoff so that the Project will not result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.

Level of Significance. **Less than significant.**

Threshold 4.10 (d). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				■

Impact Analysis

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.[24] According to the California Department of Conservation, California Official Tsunami Inundation Maps[25], the site is not located within a tsunami inundation zone. In addition, the Project would not be at risk from seiche because there is no water body in the area of the Project site capable of producing as seiche.

Level of Significance: **No impact**.

Threshold 4.10 (e) Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			■	

Impact Analysis

As discussed under Threshold 4.10 (a) and 4.10 (c), with implementation of the proposed drainage system improvements and features, the Project will not conflict with or obstruct implementation of the *Lahontan Basin Plan*. In addition, as discussed under Threshold 4.10 (b), the Project site is not subject to a Sustainable Groundwater Water Management program and will not substantially impede sustainable groundwater management of the basin

Level of Significance: **Less than significant**.

[24] https://www.fema.gov/flood-maps, accessed on April 25, 2021.
[25] California Department of Conservation, *California Official Tsunami Inundation Maps,* https://www.conservation.ca.gov/cgs/tsunami/maps#:~:text=Coordinated%20by%20Cal%20OES%2C%20California,considered%20tsunamis%20for%20each%20area., accessed April 25, 2021.

4.11 Land Use And Planning

Threshold 4.11 (a)	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide a community?				■

Impact Analysis

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is bordered on the north by Eucalyptus Street followed by single-family residential development, on the south by vacant land, on the east by vacant land, and on the west by Topaz Road (unimproved) followed by vacant land. Given the location and surrounding land uses, the Project will not divide an established community.

Level of Significance: **No impact**.

Threshold 4.11 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			■	

Impact Analysis

The applicable plans and policies relating to a 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect are summarized below.

City of Victorville General Plan

Land Use Element

The General Plan Land Use designation for the Project site is Low Density Residential (5 du/ac). The Project proposes a density of 3.6 du/ac, which is consistent with the General Plan Land Use

Element. Other General Plan Elements that are adopted for the purposes on avoiding or mitigating an environmental effect are the

Circulation Element

Any new project is required to conform to the street sections identified in the Circulation Plan. Eucalyptus Street along the Project frontage is classified as a Super Arterial and will be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 64-foot, half-width right-of-way. Topaz Road is classified as an Arterial along the Project frontage, and will be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 49-foot, half-width right-of-way. Impacts are less than significant. Refer to Threshold 4.17 (a) in Section 4.17, *Transportation,* for further discussion.

Noise Element

Impacts are less than significant with mitigation for construction noise. Refer to Threshold 4.13 (a) in Section 4.13, *Noise,* for further discussion.

Resource Element

The Resource Element contains policies addressing water supply, biological resources, cultural resources, paleontological resources, mineral resources, flooding, water quality, solid waste, air quality, and energy. These environmental topics have been addressed under the applicable sections throughout this Initial Study. In cases where impacts were identified as potentially significant, mitigations are required to reduce impacts to less than significant.

City of Victorville Development Code

The Zoning classification is R1-T (Single Family). with a minimum lot size of 7,200 square feet. The Development Code contains regulations addressing hydrology/water quality and geology/soils. These environmental topics have been addressed under the applicable sections throughout this Initial Study. In no instances was the Project found to be inconsistent with the requirements of the Development Code.

City of Victorville Non-Motorized Transportation Plan

The Project proposes bike lanes and sidewalks along the Project frontage of Eucalyptus Street and Topaz Road. A connection to a trail system is proposed at the eastern border of the site. Impacts are less than significant. Refer to Threshold 4.17 (a) in Section 4.17, *Transportation,* for further discussion.

City of Victorville Climate Action Plan

Impacts are less than significant. Refer to Threshold 4.8 (b) in Section 4.8, *Greenhouse Gas Emissions,* for further discussion.

Mojave Desert Air Quality Management District Air Quality Management Plans

Impacts are less than significant. Refer to Threshold 4.3 (a) in Section 4.2, *Air Quality,* for further discussion.

Water Quality Control Plan for the Lahontan Region (Basin Plan)

Impacts are less than significant. Refer to Threshold 4.10 (e) in Section 4.10, *Hydrology and Water Quality,* for further discussion.

Conclusion

As demonstrated throughout this Initial Study/Mitigated Negative Declaration, the Project would not conflict with any applicable land use plan, policy, or regulation for purposes of avoiding or mitigating a physical impact to the environment.

Level of Significance: **Less than significant.**

4.12 Mineral Resources

Threshold 4.12 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Victorville General Plan indicates the Project site is within a large area encompassing much of the City of Victorville that has been designated with a Mineral Land Classification of MRZ-3A or area containing known mineral occurrences of undetermined mineral resource significance. This classification was based on a report by the California Department of Conservation, Division of Mines and Geology, entitled *Mineral Land Classification of Concrete Aggregate Resources in the Barstow - Victorville Area, San Bernardino County, California*.

The naturally occurring mineral resources within the Planning Area include sand, gravel or stone deposits that are suitable as sources of concrete aggregate. Review of the California Department of Conservation interactive web mapping, indicates there is no active mines on the Project site[26]. Accordingly, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California.

Level of Significance: **No impact.**

[26] https://maps.conservation.ca.gov/mineralresources/, accessed on April 17, 2021.

Threshold 4.12 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

The Project site is designated as Low Density Residential (LDR). As such, the Project is not delineated on the General Plan, a specific plan, or other land use plan as a locally important mineral resource recovery site.

Level of Significance: **No impact**.

4.13 Noise

Threshold 4.13 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		■		

Impact Analysis

Existing Ambient Noise Levels

As dictated by CEQA, the focus of the noise analysis is focused on whether or not the Project causes a substantial temporary or permanent increase in ambient noise levels in the immediate vicinity of the Project site.

The primary source of noise in the area is from vehicle traffic from Eucalyptus Street, which is classified as a Super Arterial by the General Plan Circulation Element. Super Arterials transport large volumes of intercity, intra-city, and regional traffic at higher speeds with limited access control points. Super arterials generally connect to freeways to distribute traffic to other facilities such as major and secondary arterials, and collector facilities serving the City and other regional networks and generate higher levels of noise.

Under existing conditions, Eucalyptus Street is functioning as a local street because it does not connect to I-15 to the east yet. General Plan EIR, *Table 5.11-6* shows that local roads are not forecast to carry enough traffic to cause any significant noise impact outside the roadway right-of- way. The maximum extent of the 65 dB CNEL contour of 49 feet would occur.

Construction Noise Impact Analysis

Construction-related noise and ground vibration will be analyzed using published reference noise and vibration levels for typical construction equipment. Anticipated project-generated levels of noise and ground vibration will be estimated based on standard attenuation rates using calculation methods recommended by Caltrans and the Federal Transit Administration.

Noise levels associated with the construction will vary with the different types of construction equipment. Table 4.13-1, *Typical Construction Equipment Noise Levels* identifies the level of noise generated by construction equipment.

Table 4.13-1. Typical Construction Equipment Noise Levels

Type	Lmax (dBA) at 50 Feet
Backhoe	80
Grader, Dozer, Excavator, Scraper	85
Truck	88
Concrete Mixer	85
Pneumatic Tool	85
Pump	76
Saw, Electric	76
Air Compressor	81
Generator	81
Paver	89
Roller	74

Source: FTA Transit Noise and Vibration Impact Assessment Manual.

Construction noise will have a temporary or periodic increase in the estimated 65 dBA ambient noise level above the existing within the Project vicinity. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during grading phase. The construction noise levels are expected to range from 74 to 89 dBA. The nearest sensitive receptors are the residential uses located approximately 100 feet north of the Project site across Eucalyptus Street. For every doubling of distance, the sound level reduces by 6 dBA. Thus, the noise levels at these residential uses is forecast to range from 68 dBA to 83 dBA.

To reduce construction impacts to the residential uses to the north, the following mitigation measure is required.

Mitigation Measure(s)

NOI-1. Construction Noise Mitigation. *Prior to the issuance of a grading permit, the following notes shall be included on grading plans and building plans. Project contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by City of Victorville staff or its designee to confirm compliance as needed. These notes also shall be specified in bid documents issued to prospective construction contractors.*

a) Haul truck deliveries shall be limited daytime hours of 7:00am to 6:00pm.

b) Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.

c) All stationary construction equipment shall be placed in such a manner so that emitted noise is directed away from any sensitive receptors adjacent to the Project site.

d) Construction equipment staging areas shall be located the greatest distance between the staging area and the nearest sensitive receptors (e.g. single-family residences).

Off-Site Operational Traffic Noise Impacts

Under existing conditions, traffic volumes are relatively low (179 trips N/S on Topaz Road and E/W on Eucalyptus Street because Eucalyptus Street terminates in a dead end approximately 600 feet east of the Project site. The Project expects to generate a maximum of 642 daily trips at full occupancy with 50 trips during the AM peak hour and 67 trips during the PM peak hour (periods where the highest noise levels will be generated).

According to Caltrans, the human ear is able to begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[27] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable.

The existing peak hour traffic volumes are 252 trips in the AM and 404 trips in the PM. The Project traffic will increase traffic volumes by 15% in the AM peak hour and 20% in the PM peak hours. As the Project does not double the existing traffic volumes so noise impacts from traffic noise are less than significant.

[27] Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

Conclusion

With implementation of Mitigation Measure NOI-1, the Project's construction noise impacts will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Level of Significance: **Less than significant** w/mitigation measure NOI-1 implemented.

Threshold 4.13 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Generation of excessive ground borne vibration or groundborne noise levels?			■	

Impact Analysis

Ground-borne vibration levels from automobile traffic are generally overshadowed by vibration generated by heavy trucks that roll over the same uneven roadway surfaces. The Project does not involve the use of heavy trucks, so vehicle traffic generated by the Project will not generate excessive ground borne vibration.

According to the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018[28], while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory compaction, demolition, and drilling or excavation near sensitive structures. The Project does not require these types of construction activities.

Level of Significance: **Less than significant**.

Threshold 4.13 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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			■	

[28] https://www.transit.dot.gov/research-innovation/transit-noise-and-vibration-impact-assessment-manual-report-0123.

Threshold 4.13 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
people residing or working in the project area to excessive noise levels?				

Impact Analysis

The Project consists of single-family residences and will not expose people to aircraft noise. In addition, The Project site is located not located within an airport land use plan[29]. The nearest airports from the site are Hesperia Airport located approximately 6 miles southeast and the Southern California Logistics Airport located approximately 8 miles south so there is no existing aircraft noise impacts affecting the site that would be exacerbated by the Project and thereby expose residents of the Project to excessive noise levels.

Level of Significance: **Less than significant impact.**

4.14 Population And Housing

Threshold 4.14 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			■	

Impact Analysis

According to the 2020 population estimates provided by the California Department of Finance, there are 3.45 persons per households in Victorville[30]. Based on 65 dwelling units, the Project could increase the overall population of the City by 224 persons (assuming all new residents will come from outside the city limits). The Project site is located on the southeast corner of Eucalyptus Street and Topaz Road in close proximity to residential development and Sunset Ridge Park and is a logical extension of existing nearby development. In addition, the Project site is served by existing water and sewer facilities, gas and electric utilities, and roadways. No

[29] https://cms.sbcounty.gov/lus/Planning/AirportLandUse.aspx, accessed on April 25, 2021.
[30] https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/, accessed on April 6, 2021.

additional infrastructure will be needed to serve the Project other than connection to infrastructure adjacent to the site.

Level of Significance: **Less than significant.**

Threshold 4.14 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				■

Impact Analysis

The Project site consists of undeveloped vacant land. Therefore, implementation of the Project would not displace a substantial number of existing housing, nor would it necessitate the construction of replacement housing elsewhere.

Level of Significance: **No impact**.

4.15 Public Services

Threshold 4.15 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			■	
2) Police protection?			■	
3) Schools?			■	
4) Parks?			■	

Threshold 4.15 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5) Other public facilities?			■	

FIRE PROTECTION

Impact Analysis

The Victorville Fire Department provides fire protection services to the Project site The Project is currently served by Fire Station No. 313 located approximately 3.5 miles northeast the Project site at 13086 Amethyst Road. Fire Station No 313, constructed but not yet in operation, is located approximately 1/4th of a mile west of the site at 12820 Eucalyptus Street.

Development of the Project would impact fire protection services by placing an additional demand on existing fire protection resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes.

In addition, the City collects a Development Impact Fee to assist the City in providing fire protection facilities. Payment of the Development Impact Fee would be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project. Therefore, the Project would not result in the need to construct new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.

Level of Significance: **Less than significant.**

POLICE PROTECTION

Impact Analysis

The City of Victorville Police Department provides community policing to the Project site from the Victorville Police Station located at 14200 Armagosa Road. The City collects a Development Impact Fee to assist the City in providing for capital improvement costs for police protection facilities. Payment of the Development Impact Fee would be applied to police facilities and/or equipment, to offset the incremental increase in the demand for police protection services that would be created by the Project. Therefore, the Project would not result in the need to construct

new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.

Level of Significance: **Less than significant**.

SCHOOLS

Impact Analysis

The Project proposes 65 new housing units that may directly create additional students to be served by the Hesperia Unified School District which serves the Project site. However, the Project would be required to contribute fees to the Hesperia Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services.

Level of Significance: **Less than significant**.

PARKS

Impact Analysis

The Sunset Ridge Park is located within walking distance to the Project site to serve the residents. In addition, the City collects a Development Impact Fee to assist the City in providing for additional park facilities to serve the growing population as needed.

Level of Significance: **Less than significant**.

OTHER PUBLIC FACILITIES

As noted above, development of the Project could add approximately 224 persons to the population of the City, assuming that all new residents come from outside the City limits. This number of persons in relation to the current population of 126,432,[31] would not significantly increase the demand for public services, including public health services and library services which would require the construction of new or expanded public facilities.

Level of Significance: **Less than significant.**

4.16 Recreation

[31] https://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/, accessed on April 6, 2021.

Threshold 4.16 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				■

Impact Analysis

Sunset Ridge Park is a community park located within walking distance to the Project site. Development of the Project could add approximately 224 persons to the population of the City, assuming that all new residents come from outside the City limits. This number of would not significantly increase the use of Sunset Ridge Park to the degree that deterioration of the facility would occur or be accelerated.

Level of Significance: **No impact**.

Threshold 4.16 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				■

Impact Analysis

The Project proposes a 1.9-acre passive recreation/water quality basin that connects to the City's trail system. Physical impacts to the environment as a result of developing the park are addressed throughout this Initial Study as applicable.

Level of Significance: **No impact**.

4.17 Transportation

The following analysis is based in part on the following technical report: *Topaz Road and Eucalyptus Street Residential Traffic Impact Analysis,* Translutions, Inc., February 5, 2021, and is included as Appendix G to this Initial Study.

Threshold 4.17(a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			■	

Impact Analysis

Public transportation services within the City of Victorville and near the proposed project include bus transit service provided by the Victor Valley Transit Authority. The closet transit routes to the Project site are located on Bear Valley via Routes 21W and Route 54 approximately 1 mile north. The Project is not proposing any improvements that would preclude future transit service in the area.

Roadways

As required by the General Plan Circulation Element, the Project is required to construct the following roadway improvements.

Topaz Road (Arterial)

Topaz Road, along the Project frontage, shall be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 49-foot, half-width right-of-way.

Eucalyptus Street (Super Arterial)

Eucalyptus Street shall be improved with pavement, curb, gutter, sidewalk, bike lane, and landscaped parkway within a 64-foot, half-width right-of-way.

Internal Streets (Local)

Proposed internal streets will be public roads improved with pavement, curb, gutter, sidewalk, driveway approaches, and landscaped parkway within a 60-foot, full-width right-of-way.

Non-Motorized Transportation Plan

The Plan serves as the guiding document for the City to follow in improving its bicycle and pedestrian infrastructure and programs. It complements the Circulation Element of the General Plan which discusses the necessity for developing non-motorized facilities. The Project implements the Plan by providing the following:

- Bike lanes on Eucalyptus Street and Topaz Road.
- Connection to the proposed trail located adjacent to the eastern boundary of the site.
- Sidewalks on Eucalyptus Street, Topaz Road, and internal streets.

Conclusion

Based on the preceding analysis, the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Level of Significance: **Less than significant.**

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			■	

Impact Analysis

Changes to California Environmental Quality Act (CEQA) Guidelines were adopted in December 2018, which require all lead agencies to adopt Vehicle Miles Traveled (VMT) as a replacement for automobile delay-based level of service (LOS) as the new measure for identifying transportation impacts for land use projects. This statewide mandate took effect July 1, 2020. Impacts related to LOS will be evaluated through the City's development review process apart from CEQA.

Based on the *Victorville Vehicle Miles Traveled Analysis Guidelines*, June 2020, projects that will not require a VMT analysis and can be screened out by using either the daily vehicle trips generated by the project or the project's land use type. The following screening thresholds are included in the City Guidelines for projects that can be assumed to have less than significant impacts under CEQA:

- □ **Daily Vehicle Trip Threshold: The project results in a net increase of 1,285 or less weekday daily trips:** The Project generates 642 daily trips and does not exceed this threshold.

- □ **Land Use Type Threshold: The project includes less than 136 Single-Family dwelling units:** The Project proposes 65 single-family dwelling units and does not exceed this threshold.

Based on the analysis above, the Project will not require a full VMT analysis.

Level of Significance: **Less than significant**.

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			■	

Impact Analysis

The proposed roadway improvement will be designed in accordance with the City of Victorville *Minimum Requirements for Street Improvement Plans* document. In addition, the Project is located in an area developed with residential uses and a community park. As such, the Project would not be incompatible with existing development in the surrounding area to the extent that it would create a transportation hazard because of an incompatible use.

Level of Significance: **Less than significant**.

Threshold 4.17(b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in inadequate emergency access?			■	

Impact Analysis

The Project would take access from Eucalyptus Street and Topaz Road. During the course of the preliminary review of the Project, the Project's transportation design was reviewed by the City's Engineering Department, Fire Department, and Police Department to ensure that adequate access to and from the site would be provided for emergency vehicles.

Level of Significance: **Less than significant**.

4.18 Tribal Cultural Resources

Threshold 4.18 (a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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)?				■

Impact Analysis

Refer to *Cultural Resources*, Threshold 4.5 (a) under the regarding historical resources. The project is not listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

Level of Significance: No impact.

Threshold 5.18 (b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		■		

Assembly Bill (AB) 52 created a process for consultation with California Native American Tribes in the CEQA process. Tribal Governments can request consultation with a lead agency and give input into potential impacts to tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed project.

The City of Victorville commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code section 21080.3.1. The San Manuel Band of Mission Indians (SMBMI) responded and indicated the proposed Project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the Cultural Resources Management Department's present state of knowledge, SMBMI did not have any concerns with the Project's implementation, as planned, at this time. As a result, SMBMI requested that Mitigation Measure TCR-1 through TCR-5 be made a part of the project/permit/plan conditions.

Mitigation Measures

Mitigation Measure TCR-1. Inadvertent Discovery. *In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-4, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.*

Mitigation Measure TCR-2. Monitoring and Treatment Plan. *If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-4. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.*

Mitigation Measure TCR-3. Human Remains. *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.*

Mitigation Measure TCR-4. Pre-Contact Historic Cultural Resources. *The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in Mitigation Measure TCR-1 and TCR-2, of any pre-contact and/or historic-era cultural resources*

discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

Mitigation Measure TCR-5. Documents. *Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.*

Level of Significance: With implementation of Mitigation Measures TCR-1 through TCR-5, impacts are **Less than significant**.

4.19 Utilities And Service Systems

Threshold 4.19 (a). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		■		

Impact Analysis

The construction or installation of the infrastructure and utilities needed to serve the Project will result in ground disturbance that may impact Biological Resources, Cultural Resources, Tribal Cultural resources, and generate dust and noise in the absence of any protective or avoidance measures.

Water Service

The Project will connect to the existing waterline at the intersection of Eucalyptus Street and Topaz Road.

Sewer Service

The Project will connect to the existing sewer line at the intersection of Eucalyptus Street and Topaz Road.

Storm Drainage Improvements

The primary hydraulic design elements are the roads and the storm drain. Roads within the project will be used to carry runoff to a proposed water quality basin designed for both retention and detention before discharging to the existing storm drain in Eucalyptus Street.

Electric Power Facilities

The Project will connect to the existing Southern California Edison electrical distribution facilities available in the vicinity of the Project site.

Natural Gas Facilities

The Project will connect to the existing Southern California Gas natural gas distribution facilities available in the vicinity of the Project site.

Telecommunication Facilities

Telecommunication facilities include a fixed, mobile, or transportable structure, including, all installed electrical and electronic wiring, cabling, and equipment, all supporting structures, such as utility, ground network, and electrical supporting structures, and a transmission pathway and associated equipment in order to provide cable TV, internet, telephone, and wireless telephone services to the Project site. Services that are not provided via satellite will connect to existing facilities maintained by the various service providers.

Conclusion

Construction or installation of utilities and service systems may impact Biological Resources, Cultural Resources, Paleontological Resources, Tribal Cultural Resources, and generate excessive noise. Mitigation Measures BIO-1 through BIO-10, CR-1, CR-2, GEO-1, GEO-2, NOI-1 and TCR-1 through TCR-5 are required.

Level of Significance: With the implementation the mitigation measures identified throughout this Initial Study, impacts are **less than significant**.

Threshold 4.19 (b). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple years?			■	

Impact Analysis

Water service would be provided to the Project site by the Victorville Water District. Based on a water demand generation factor of 0.7785 AF/YR per dwelling unit (assuming 695 gallons per day), water demand is 50.6 AY/YR[32].

Per the Mojave Basin Area Judgment, producers in the Mojave Basin Area are allowed to produce as much water as they need annually to meet their requirements. An underlying assumption of the Judgment is that sufficient water will be made available to meet the needs of the Basin in the future from a combination of natural supply, imported water, water conservation, water reuse and transfers of FPA among parties.[33]

According to the Victorville Water District *2015 Urban Water Management Plan*, the District has adequate supplies to meet demands during average, single dry and multiple dry years through 2040. In addition, the site's General Plan land use designation of Low Density Residential (LDR) was accounted for in the Victorville Water District's *2015 Urban Water Management Plan*.

Level of Significance: **Less than significant**.

Threshold 4.19 (c). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			■	

Impact Analysis

Wastewater treatment service would be provided to the Project site by Victor Valley Wastewater Reclamation Authority (VVWRA) regional wastewater treatment plant. VVWRA has undertaken

[32] City of Victorville PLAN 19-00033 and PLAN 20-00008.
[33] Victorville Water District 2015 UWMP, p. 31.

major upgrade projects to accommodate growth in the service area and improve the quality of effluent discharged to the Mojave River. These upgrades include plant expansions from a design flow of 5.5 million gallons per day (MGD) in 1989 to the current 18 MGD design flow.[34]

***Level of Significance*: Less than significant.**

Threshold 4.19 (d). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Generate solid waste more than State or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			■	

Impact Analysis

Construction Related Impacts

The California Green Building Standards Code ("CAL Green'), requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods. The City of Victorville Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CAL Green solid waste requirements

Operational Related Impacts

According to the California Emissions Estimator Model, the Project is estimated to generate 72 tons of solid waste per year[35]. Solid waste from Victorville is transported to the Victorville Sanitary Landfill at 18600 Stoddard Wells Road. According the CalRecycle website, the Victorville Sanitary Landfill has a daily throughput of 3,000 tons per day and a remaining capacity of 93,400,000 cubic yards. The expected closure is October 1, 2047.[36] As such, there is adequate landfill capacity to serve the Project.

***Level of Significance*: Less than significant**.

[34] Lahontan Water Board Order No. R6V-2013-0038.

[35] CalEEMod Outputs, Appendix A.

[36] https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652, accessed on April 26, 2021.

Threshold 4.19 (e). Would the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			■	

Impact Analysis

Victorville Disposal (Burrtec), currently provides solid waste collection services to the City as required by Municipal Code Chapter 6.36, *Solid Waste Services*. Burrtec is required to provide these services in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

Level of Significance: **Less than significant**.

4.20 Wildfire

Threshold 4.20 (e). Wildfire.	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Is the project located in or near state responsibility areas or lands classified as very high fire hazard severity zones?				■

Impact Analysis

A wildfire is a nonstructural fire that occurs in vegetative fuels, excluding prescribed fire. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. As stated in the State of California's General Plan Guidelines: "*California's increasing population and expansion of development into previously undeveloped areas is creating more 'wildland-urban interface' issues with a corresponding increased risk of loss to human life, natural resources, and economic assets associated with wildland fires*." To address this issue, the state passed Senate Bill 1241 to require that General Plan Safety Elements address the fire severity risks in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs).

According to the *California Fire Hazard Severity Zone Viewer* maintained by Cal Fire, the Project site is not located within a high wildfire hazard area[37]. Project site is not located in or near state

[37] https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed on April 25, 2021.

responsibility areas or lands classified as very high fire hazard severity zones. As such, Thresholds 4.20 (a) through 4.20 (d) below require no response.

Level of Significance: **Less than significant**.

Threshold 4.20 (a)	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	N/A	N/A	N/A

Threshold 4.20 (b)	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A	N/A	N/A	N/A

Threshold 4.20 (c)	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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?	N/A	N/A	N/A	N/A

Threshold 4.20 (d)	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?				

4.21 Mandatory Findings Of Significance

Threshold 4.21(a) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		■		

Impact Analysis

As indicated in this Initial Study, biological resources, cultural resources, and tribal cultural resources may be adversely impacted by Project development. The following mitigation measures are required to reduce impacts to less than significant levels: Mitigation Measures BIO-1 through BIO-10, CR-1, CR-2, GEO-1, GEO-2, NOI-1 and TCR-1 through TCR-5 are required.

Level of Significance: With implementation of the above-described mitigation measures impacts are **less than significant**.

Threshold 4.21 (b) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?			■	

In instances where impacts have been identified, compliance with federal, state, or local law currently in place which effectively reduces environmental impacts, or Mitigation Measures are required to reduce impacts to less than significant levels. Therefore, potential adverse environmental impacts of the Project, in combination with the impacts of other past, present, and future projects, would not contribute to cumulatively significant effects.

Level of Significance: **Less than significant**.

Threshold 4.21 (c) Does the Project:	Potentially Significant or Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		■		

As indicated by this Initial Study, the Project may cause or result in certain potentially significant environmental impacts that directly affect human beings for construction noise. The following mitigation measures are required to reduce impacts to less than significant levels: NOI-1-Construction Noise Mitigation Plan.

Level of Significance: With implementation of Mitigation Measure NOI-1, impacts are **less than significant.**