Victorville CarMax Auto Superstore Project
(PLAN 18-00052)
Recirculated
Draft EIR

August 2020

appliedplanning
inc

Recirculated
DRAFT ENVIRONMENTAL IMPACT REPORT

for the

Victorville CarMax Auto Superstore Project
(PLAN18-00052)
State Clearinghouse Number:
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Prepared for:

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August 2020

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PREFACE

PREFACE

Background

In March 2020, the City of Victorville (City) published the Victorville CarMax Draft Environmental Impact Report (original Draft EIR, original DEIR). The original DEIR evaluated potential environmental impacts of the proposed Victorville CarMax Project (Project). In summary, the Project proposes construction of an auto dealership and supporting auto service uses totaling approximately 8,526 square feet within the approximately 4.76-acre Project site. The Project site is located in the City of Victorville in San Bernardino County. The Project site is located within the Civic Center Community Sustainability Specific Plan (CCCSP, Specific Plan), along the east side of Civic Drive, south of the intersection of Roy Rogers Drive and Civic Drive. The street address of the Project site is 14901 Civic Drive.

The original DEIR was circulated for public review and comment for a period of 45 days (March 6 through April 20, 2020). During the review period, public agencies and private parties provided comments on the original DEIR. The City has reviewed those comments and has identified potential issues of environmental concern that could benefit from modification and further discussion within a Recirculated Draft EIR (RDEIR). Additionally, the City recognizes that the recent COVID-19 pandemic has restricted public access to City facilities, as well as information available through the City, including but not limited to information presented in the original DEIR. In response to comments received to date, to facilitate distribution of information presented in the original DEIR, and encourage public participation in the EIR process generally, in its role as the Lead Agency, the City has directed the recirculation of the original DEIR in its entirety.

EIR Recirculation Requirements

EIR recirculation requirements are outlined at *CEQA Guidelines* Section 15088.5, excerpted in pertinent part below.

> **15088.5. RECIRCULATION OF AN EIR PRIOR TO CERTIFICATION**
>
> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In addition, and as is the case here, a lead agency may choose to recirculate an EIR if additional studies or analysis is conducted for a project before a specific action is taken by local decision makers to approve a project.

Summary of the Recirculated Draft EIR Content and Revisions

This Preface Section is unique to this RDEIR and an additional "draft Mitigation Monitoring Plan" Appendix has been added (RDEIR Appendix F). Numbering and sequencing of the original DEIR, including the original DEIR Appendices and supporting technical studies is otherwise maintained in this RDEIR.

Revisions to the original DEIR presented in this RDEIR are summarized below. These revisions do not affect findings and conclusions of the original DEIR. Substantive revisions to the original DEIR reflected in this RDEIR include:

- Additional discussion and illustration of the disturbed/degraded character of the Project site. See RDEIR Section 3.0, *Project Description*.

- The discussion of Transportation impacts is revised. Consistent with *CEQA Guidelines* Section 15064.3 (b) requirements, the RDEIR Transportation Section is revised to address potential Vehicle Miles Traveled (VMT) impacts of the Project.

  The City recognizes that vehicle delay (Level of Service, LOS) deficiencies are no longer environmental impacts under CEQA.[1] Although not specifically relevant to an analysis of CEQA transportation impacts, City General Plan Policies and City Traffic Impact Study Guidelines require LOS analysis for new development projects. For this reason, although LOS cannot be used to make a conclusion of a significant environmental effect, analysis of Project-related LOS deficiencies is provided herein for City use and informational purposes. Discussions of "traffic

[1] *CEQA Guidelines* Section 15064.3, effective January 1, 2019, "describes specific considerations for evaluating a project's transportation impacts" and provides that, except for roadway capacity projects, "a project's effect on automobile delay (or LOS) shall not constitute a significant environmental impact." (*CEQA Guidelines*, § 15064.3, subd. (a).)

impacts" presented in the Project TIA (RDEIR Appendix B) are amended accordingly by reference.

- Archaeological resources impact mitigation is revised. See Mitigation Measure CR-1. Archaeological resources impact mitigation implementation, timing, and monitoring is outlined in the RDEIR Mitigation Monitoring Plan (MMP), included as RDEIR Appendix F.

- Paleontological resources impact mitigation is revised. See Mitigation Measure GEO-2. Paleontological resources impact mitigation implementation, timing, and monitoring is outlined in the RDEIR Mitigation Monitoring Plan (MMP), included as RDEIR Appendix F.

- The discussion of GHG emissions impacts is revised, clarifying and further substantiating that nominal GHG emissions resulting from the Project would not comprise a significant environmental impact. Project compliance with applicable GHG emissions reduction plans and strategies is further substantiated. See RDEIR Section 4.4, *Greenhouse Gases*.

- The discussion of Project consistency with applicable City and CCCSP sustainability, energy conservation, and energy efficiency policies is revised and expanded. See RDEIR Sections 4.1, *Land Use* and 4.6, *Energy.*

- The discussion of Alternative Sites is revised and expanded. See RDEIR Section 5.2, *Alternatives Analysis*.

- The discussion of City Municipal Separate Storm Sewer System Permit (MS4 Permit) requirements and provisions is revised. See RDEIR Section 1.0, *Executive Summary*.

- The discussion of water supply considerations is revised. See RDEIR Section 1.0, *Executive Summary*.

Recirculated Draft EIR Review Process

Consistent with *CEQA Guidelines* Sections 15087 and 15088.5(d), this RDEIR has been distributed for public review for a period of 45 days. During the 45-day review period, the general public, agencies, and organizations are encouraged to submit written comments on the RDEIR to the City.

Copies of the RDEIR are available for review at Victorville City Hall, Development Department, 14343 Civic Drive, Victorville, California 92393. Please contact the City via email at planning@victorvilleca.gov or telephone (760) 955-5135 for current days/hours of operation. The RDEIR is also posted at the City's website: https://www.victorvilleca.gov/government/city-departments/development/planning/environmental-review-notices.

All written comments on this RDEIR should be addressed to:

City of Victorville, Development Department
14343 Civic Drive
Victorville, California 92393
Contact Person: Travis Clark, Associate Planner
TClark@victorvilleca.gov

At the conclusion of the public review process, a Final RDEIR will be prepared. The Final RDEIR will comprise comments received on the RDEIR and responses to those comments; the RDEIR including any necessary revisions or corrections; and the original DEIR.

Although a part of the administrative record, previous comments received on the original DEIR do not require a written response in the Final RDEIR. New comments must be submitted for the RDEIR. The City, as provided at *CEQA Guidelines*, Section 15088.5(f)(1), will not respond to comments received on the original DEIR but will respond to new comments received on this RDEIR.

1.0 EXECUTIVE SUMMARY

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1.1 INTRODUCTION

Consistent with requirements of the California Environmental Quality Act (CEQA), this Recirculated Draft Environmental Impact Report (RDEIR [which supersedes the original DEIR]) evaluates and discloses potential environmental impacts resulting from construction and operation of the Victorville CarMax Auto Superstore Project (Project). The Project proposes construction of an auto dealership and supporting auto service uses totaling approximately 8,526 square feet within an approximately 4.76-acre Project site.

The Project site is located in the City of Victorville in San Bernardino County. The Project site is located within the Civic Center Community Sustainability Specific Plan (Specific Plan), along the east side of Civic Drive, south of the intersection of Roy Rogers Drive and Civic Drive. The street address of the Project site is 14901 Civic Drive. Please refer also to RDEIR Section 3.0, *Project Description*, and Figure 3.2-1, *Project Location*, for additional information.

This RDEIR Section summarizes Project background issues, provides a brief description of the Project and its Objectives, and summarizes potential environmental impacts of the proposal. Table 1.12-1, *Summary of Impacts and Mitigation*, presented at the conclusion of this Section, lists these impacts and presents the mitigation measures recommended to eliminate or reduce the effects of those impacts which have been determined to be potentially significant.

It is noted here that the Project would not result in any significant and unavoidable environmental impacts. For illustrative and informational purposes, Alternatives to the Project which could further reduce the Project's already less-than-significant

environmental impacts are briefly described within this Section. For a full description of the Project, its impacts, recommended mitigation measures, and considered Alternatives, please refer to RDEIR Sections 3.0, 4.0, and 5.0, respectively.

1.2 PROJECT ELEMENTS

Primary elements comprising the Project are summarized below. Please refer also to RDEIR Section 3.0, *Project Description*.

1.2.1 Development Concept

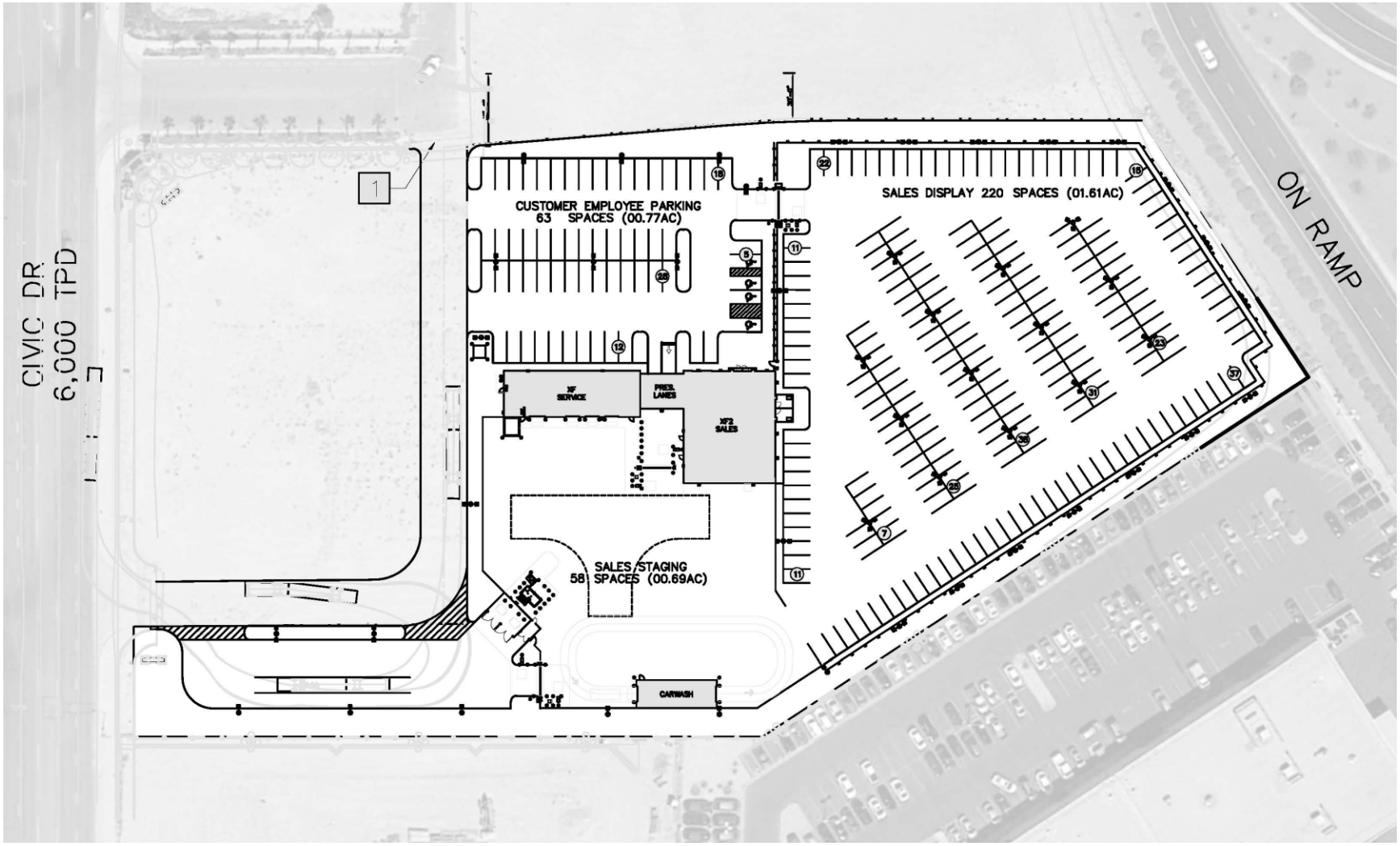
Table 1.2-1 summarizes the land uses and the maximum potential Project development scope evaluated in this RDEIR. Future variations or revisions to the Project described herein, or any other substantive change to the Project evaluated in this RDEIR would, at the discretion of the Lead Agency, be subject to subsequent environmental analysis.

Table 1.2-1
Project Development Summary

Main Dealership Sales and Service/Repair Buildings	Size
• Sales	4,312 SF
• Presentation	635 SF
• Retail Service	2,643 SF
• Carwash	936 SF
TOTAL	**8,526 SF**

1.2.2 Project Facilities

Project facilities orientation and floor plan(s) are presented at Figures 1.2-1, *Conceptual Site Plan*, and 1.2-2, *Building Floor Plan*. The Project building areas would comprise approximately 8,526 square feet and would accommodate sales, presentation and retail areas, supporting auto service/repair facilities and a dealership service carwash. The main dealership sales and service/repair building would be centrally located within the Project site. Vehicle inventory areas would be located along the Project site's easterly I-15 frontage. Customer and employee parking areas would be located in the northerly and westerly portions of the Project site.



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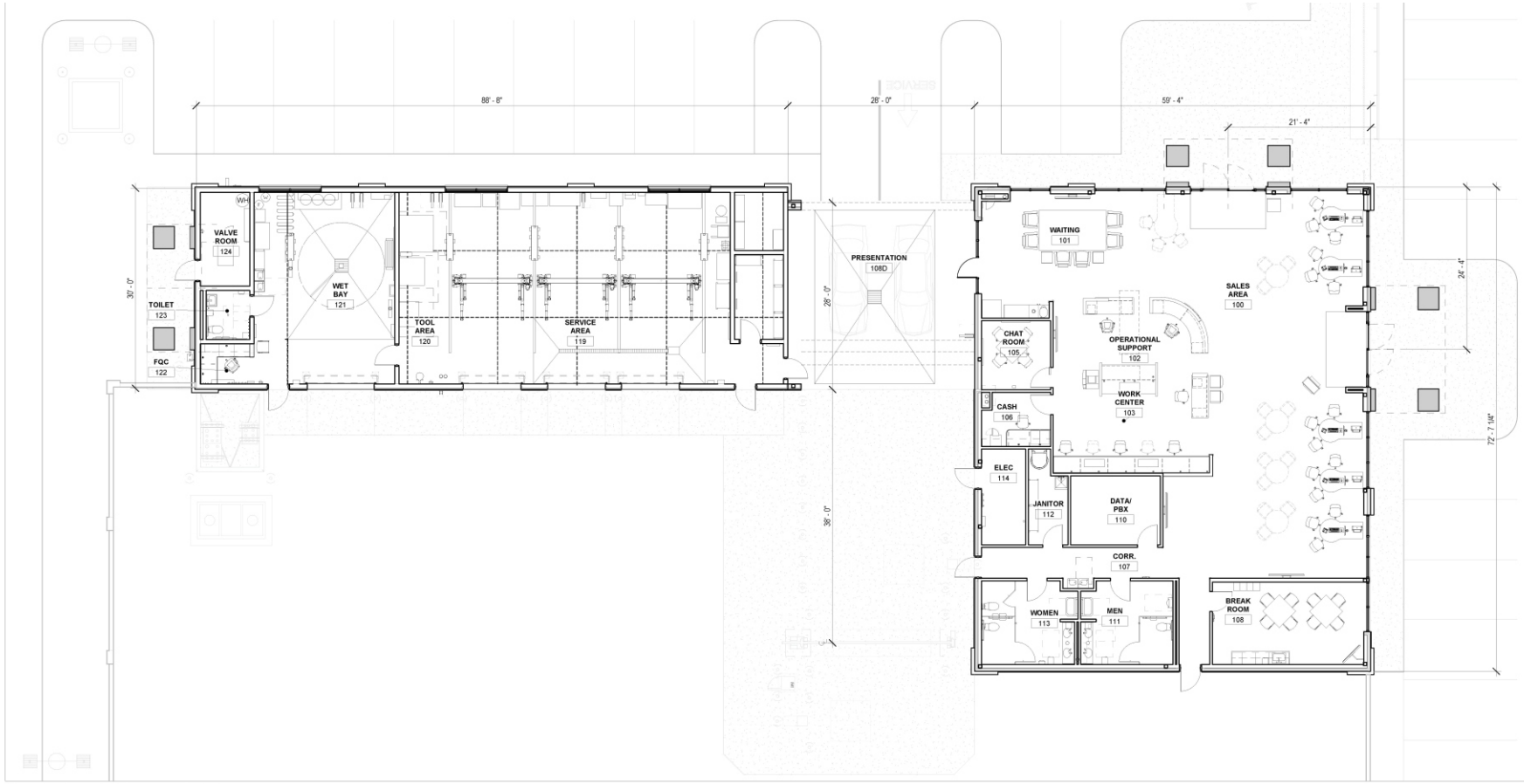
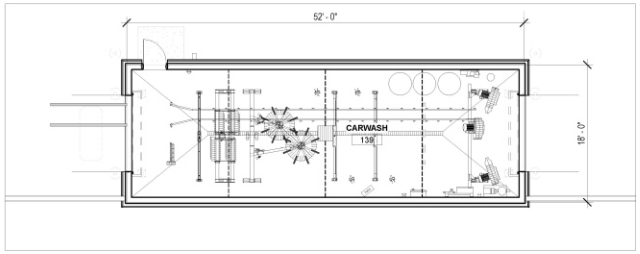
NOT TO SCALE

Source: CarMax

Figure 1.2-1
Conceptual Site Plan



1 A 2.0 SALES & SERVICE FLOOR PLAN
1/8" = 1'-0"



2 A 2.0 CARWASH FLOOR PLAN
1/8" = 1'-0"

Source: Charles J. O'Brien Architect (7/9/20)

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Figure 1.2-2
Building Floor Plan

A private above-ground storage tank (AST) for fuel and associated fuel dispensing would be located within the vehicle sales staging area, in the south-central portion of the site. ASTs for oil and antifreeze would also be located adjacent to the service portion of the sales/service building. ASTs implemented by the Project would be double-walled and include an advanced monitoring system for leak detection. ASTs would be serviced and maintained by professional third-parties.

1.2.3 Project Operations

1.2.3.1 Hours of Operation

CarMax management would establish the actual Project store operating hours. Showroom sales areas of similar stores are typically open to the public Monday through Saturday from 9:00 AM to 9:00 PM with limited hours on Sundays, subject to market factors and local law. Store retail service areas are typically open to the public Monday through Friday from 7:30 AM to 6:00 PM. Associates would be present at the store before and after the public operating hours. Within this analysis, Project operations are assumed to be limited to between the hours of 7:00 AM and 10:00 PM.

1.2.3.2 Vehicle Deliveries

Vehicle carriers would enter the Project site via the proposed southern Project driveway access to Civic Drive. Vehicles would be loaded and unloaded within a designated on-site area located in the southwesterly portion of the customer/employee parking lot. Unloaded vehicles would be driven from the parking lot into the adjacent staging area to await vehicle preparation.

1.2.3.3 Sales & Marketing

CarMax dealerships physically separate inventory areas from customer and employee parking areas. This design is intended to reduce loss and improve operational efficiency and safety. All inventory display areas would be separated from the general public by means of guardrails, gates, and fencing. Ornamental wrought-iron fencing or other means acceptable to the City would be used to separate customer and employee parking areas from vehicle display areas.

Vehicular access to display areas would be controlled by security gates. Prospective customers are most commonly accompanied by an employee while inspecting vehicles for sale within the display area. Only employees would be permitted to drive cars within the display area. Emergency access would be provided to and within staging and display areas as required by the Victorville Fire Department.

1.2.3.4 Service Operations

CarMax currently offers retail routine vehicle maintenance services, as well as vehicle repairs covered under service plans. All service work would be performed inside fully air-conditioned buildings equipped with rollup doors, eliminating the need to conduct operations with open bay doors.

Retail service vehicles and vehicles awaiting disposition off-site would be stored in a secured non-public staging area on a temporary basis. The staging area would be secured and screened by a masonry wall, or other screening/security features considered appropriate by the City. Vehicular access to the staging area would be controlled by security gates through the use of a secured key-card. A proposed dealership carwash would be located southerly of the main dealership/service building. This carwash would be available for washing of CarMax vehicle inventory but would not be accessible to the general public.

1.2.4 Project Opening Year

Under Opening Year Conditions, all Project facilities are assumed to be occupied and fully operational. For analytic purposes, the assumed Project Opening Year is 2021.

1.2.5 CarMax Superstore Architectural Concepts

Project Architectural Concepts are presented at Figure 1.2-3. CarMax Superstore architectural concepts design elements evidence split-face block with accents of smooth earth-toned painted surfaces, and clear anodized aluminum storefront framing with blue-tinted glazing. All customer entries are pronounced with a covered tower feature constructed of white Exterior Insulation and Finish Systems (EIFS) columns and a blue standing seam gable roof. The towers feature an Aluminum Composite Material (ACM)

band with the CarMax logo mounted above the entry doors. Roof-mounted equipment would be screened by a pre-finished earth-tone metal Rooftop Unit (RTU) screening and parapet walls.

1.2.6 Vehicular Access and Circulation

Vehicular access to the Project site would be provided by two STOP-controlled driveways along Civic Drive. The Project does not require access alteration(s) or any site adjacent roadway improvements.

1.2.7 Parking

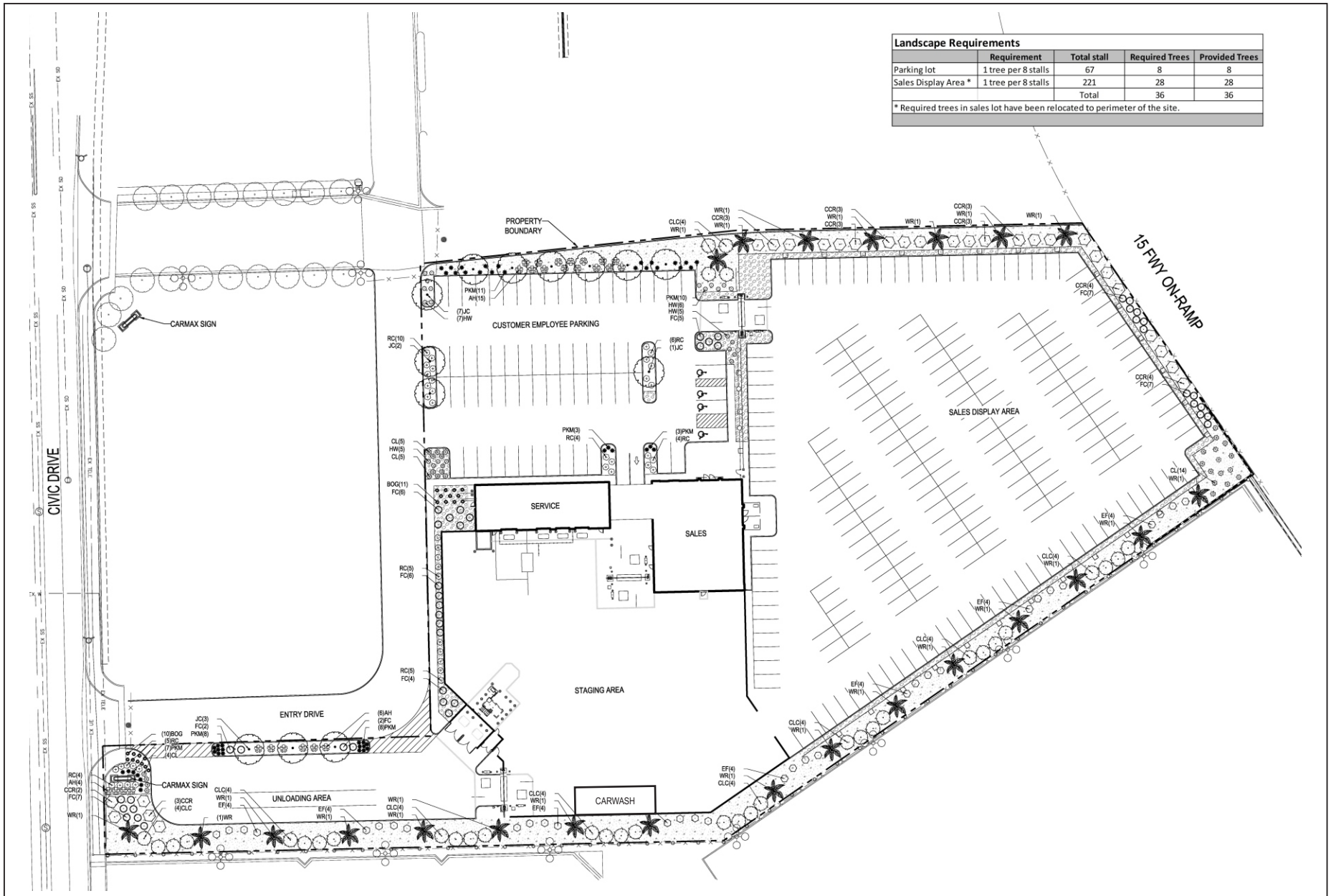
The current Project concept provides separate customer/employee (67, plus 4 handicap), staging (73), and sales display (221) parking areas. In total, 365 spaces would be provided. Within the sales display area only, and consistent with CarMax standard designs, 9′ x 17′ spaces and 20′ drive aisles are proposed. Only employees would be permitted to drive cars within the display area. All other parking facilities, including parking stalls and drive aisles configurations, would be designed and constructed pursuant to applicable provisions of the Specific Plan and City requirements.

1.2.8 Landscape/Hardscape/Streetscape

Perimeter and internal landscape/hardscape features would be provided consistent with applicable provisions of the Specific Plan, or as otherwise required by the City. The implemented landscape/hardscape concept would enhance the appearance of parking areas, provide shade and visual interest, define entry/access points, accentuate site and architectural features, and provide screening. The Project Landscape Concept is presented at Figure 1.2-4.

Source: Charles J. O'Brien Architect (7/9/20)

Figure 1.2-3
Architectural Concepts



Source: PCS Group, Inc. (5/23/19)

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Figure 1.2-4
Landscape Concept

1.2.9 Other Design/Operational Elements

1.2.9.1 Lighting

CarMax employs full cutoff LED lighting fixtures, typically mounted on 26-foot tall light standards. LED fixtures would be directed and shielded to preclude substantive light overspill onto adjacent properties. Exterior lighting intensities would be reduced after dealership operating hours. Lighting in total would conform to applicable provisions of the Specific Plan and City of Victorville Zoning Ordinance, subject to review and approval by the City.

1.2.9.2 Signs

CarMax does not use flags, balloons, inflatables (animals or other), placards in open car hoods, painted window lettering or the like in its marketing. Project signage would conform to current provisions of Section 6.13, *Signage*, of the Specific Plan, subject to review and approval by the City.

1.2.9.3 Security

CarMax employs interior and exterior security cameras for asset protection.

1.2.9.4 Employee Communications

CarMax does not require or use outdoor loudspeakers to page associates. Instead, employees use cell phones to communicate with each other. Speakers would only be employed in an effort to address after-hours trespassers, should the need arise.

1.2.10 Infrastructure/Utilities

Infrastructure and utilities that would serve the Project site are summarized below.

1.2.10.1 Water/Sewer Services

Water service to the Project would be provided by Victorville Water District (VWD) via connections to existing water facilities located within adjacent roadways. City water and sanitary sewer lines exist within Civic Drive. All Project service lines would be designed, constructed, and maintained consistent with City and VWD requirements.

Wastewater generated by the Project would be conveyed for treatment by facilities operated by the Victor Valley Wastewater Reclamation Authority (VVWRA) which owns and operates regional wastewater reclamation facilities serving Apple Valley, Hesperia, Victorville, Spring Valley Lake and Oro Grande.

1.2.10.2 Storm Water Management

Construction Storm Water Management

During Project construction, a Storm Water Pollution Prevention Plan (SWPPP) would be implemented, consistent with the requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit and water quality requirements and storm water management programs specified by the Lahontan Regional Water Quality Control Board (LRWQCB).

Post-Construction Storm Water Management

The Project storm water management system comprehensively includes proposed drainage improvements, and facilities and programs which act to control and treat storm water pollutants. Parking areas within the site would be designed to capture and direct flows to catch basins placed throughout the Project site. Storm flows will confluence while traveling towards the west side of the property, and ultimately join at a proposed diversion structure.

Low flows entering the diversion structure would be directed to a proposed Continuous Deflective Separation (CDS)[1] unit located downstream of the diversion structure to filter and treat the first flush storm water. This treated storm water will then be stored in proposed underground chambers leading towards a proposed Drywell. High flows will bypass the diversion structure and travel towards the existing 54-inch storm drain main

[1] Continuous Deflective Separation (CDS) is a storm water treatment process that employs a swirl concentrator hybrid technology combing swirl concentration and indirect screening. DCS treatment process effectively screen, separate and trap debris, sediment, and hydrocarbons from storm water runoff. The indirect screening capability of the CDS system allows for 100% removal of floatables and neutrally buoyant material debris 2.4mm or larger, without binding. CDS systems retains all captured pollutants, even at high flow rates, and provides easy access for maintenance.

located along Civic Drive. All flows entering the underground chambers will be sized to satisfy the Water Quality Management Plan (WQMP) requirements for Design Capture Volume or the difference in volume between Pre- and Post-Development condition, whichever is greater. The WQMP requires a minimum design capture volume of 10,418.60 cubic feet. The Project would provide an underground storage chamber to satisfy the WQMP conditions by providing a minimum storage capacity of 10,500 cubic feet of volume. This proposed underground storage will lead into a proposed Drywell onsite. Therefore, storm water runoff from the Project site would not increase under post-development conditions.

1.2.10.3 Solid Waste Management

It is anticipated that Project-generated solid waste would be collected and conveyed by existing service providers to the Victorville Landfill, which is located northerly of the City, at 18600 Stoddard Wells Road. Additionally, a Materials Recycling Facility (MRF) is located within the City. The MRF provides processing of residential and mixed commercial recyclables generated within the City of Victorville and the Town of Apple Valley.

1.2.10.4 Electricity

Electrical service to the Project would be provided by Southern California Edison (SCE). New lines installed pursuant to the Project would be placed underground. Alignment of service lines and connection to existing services would be as required by SCE. Surface-mounted equipment, such as transformers, meters, and service cabinets would conform to building setback requirements outlined in the Specific Plan, or as otherwise required by the City and SCE.

To allow for, and facilitate, Project construction activities, provision of temporary SCE electrical services improvements would be required. The scope of such temporary improvements is considered to be consistent with and reflected within the total scope of development proposed by the Project.

1.2.10.5 Natural Gas

Natural gas service would be provided by the Southwest Gas Corporation (Southwest Gas). Existing service lines would be extended to the Project uses. Alignment of service lines and connection to existing services would be as required by Southwest Gas.

1.2.10.6 Communications Services

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. As with electrical service lines, all existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters, service cabinets, etc., would be screened and would conform to building setback requirements outlined in the Specific Plan, or as otherwise required by the City.

1.2.11 Fire Protection and Police Protection Services

Police and fire protection services are currently available to the Project site and are described below.

- Fire Protection Services: Fire protection and emergency response services for the Project and the City of Victorville are provided by the Victorville Fire Department. The City also participates in the Regional Fire Protection Authority (RFPA), providing fire protection and emergency response services under mutual aid agreements with San Bernardino County.

- Police Protection Services: Police protection for the Project site and vicinity properties is currently provided by the Victorville Police Department, as a contract service of the San Bernardino County Sheriff Department.

1.2.12 Schools, Parks and Other Public Services

The City also provides or facilitates provision of a range of other services that would be generally available to the Project patrons and employees. These services include, but are not limited to: educational services, library services, arts and entertainment, and human services. These services and associated facilities are generally programmed and implemented in response to residential development and demands of resident populations. The Project commercial uses would not substantively affect the City's resident population. As such, facilities proposed by the Project would not affect schools, parks, or other public services or their availability.

1.2.13 Energy Efficiency/Sustainability

Energy-saving and sustainable design features and operational programs would be incorporated in the Project facilities pursuant to California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City of Victorville. Consistent with City requirements as outlined at General Plan Policy 7.2.1, the final Project designs and building plans as reviewed and approved by the City would be 15 percent more efficient than 2008 Title 24 Standards.

In support of General Plan Policy 7.1.1, and onsite energy production policies outlined in the Civic Center Community Specific Plan (CCCSP, Specific Plan), the Project would implement a solar water heating system (approximately 120 gallon system); and solar-powered lighted bollards leading from the customer/employee lot to the front door of the sales building.

1.2.14 Construction Traffic Management Plan

Temporary and short-term traffic detours and traffic disruptions could result during Project construction activities including implementation of access and circulation improvements noted above. Accordingly, the Project Applicant would be responsible for the preparation and submittal of a construction area traffic management plan (Plan) to be reviewed and approved by the City. Typical elements and information incorporated in the Plan would include, but would not be limited to:

- **Name of on-site construction superintendent and contact phone number.**

- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).

- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).

- **Identification and Description of Material Storage Locations (if any).**

- **Location and Description of Construction Trailer (if any).**

- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of-way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.

- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.

- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the building permit. The Plan and its requirements would also be provided to all contractors as one required component of building plan/contract document packages.

1.3 PROJECT OBJECTIVES

The primary goal of the Project is the redevelopment of the subject site with a car dealership use that responds to local and regional car sales market demands. Supporting objectives of the Project include the following:

- Transition and repurpose the subject site to a useful productive commercial auto dealership and services facility. Benefits would include new sales tax revenues and increased property tax revenues available to the City of Victorville.

- Preserve and enhance visual attributes of the Project site.

- Provide car dealership sales and service facilities that are responsive to community needs and that are compatible with proximate land uses.

- Take advantage of access and visual recognition provided by the Project site's adjacency to the I-15 freeway.

- Implement employment-generating land uses that would create new jobs available to City residents.

- Take advantage of available infrastructure.

1.4 DISCRETIONARY APPROVALS AND PERMITS

Discretionary actions, permits and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

1.4.1 Lead Agency Discretionary Actions and Permits

- **CEQA Compliance.** The City must certify the Recirculated Environmental Impact Report prior to, or concurrent with, any approval of the Project.

- **Specific Plan Amendment.** To implement the Project uses, the Applicant has requested approval of an amendment to the Civic Center Community Sustainability Plan to conditionally allow the proposed uses.

- **Site Plan Review and Approval.** The Project uses, and their proposed configurations are subject to review and approval by the City.

- **Parcel Map Approval.**

- **Conditional Use Permit.** The Project would require a Conditional Use Permit to allow a used vehicle sales operation within the CC-2 zone of the Specific Plan.

- **Architectural Review and Approval.** Architectural designs of the Project facilities are subject to review and approval by the City.

- **Other City Permits.** Various other City of Victorville permits (such as construction, grading, and encroachment) are required to allow implementation of the Project facilities.

1.4.2 Other Agency Consultation and Permits

Anticipated consultation(s) and permits from agencies other than the City that would be necessary to realize the proposal would likely include, but would not be limited to, the following:

- Consultation with requesting Tribes as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*; and *SB 18, Burton. Traditional tribal cultural places*.

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;

- Permitting may be required by/through the Mojave Desert Air Quality Management District (MDAQMD) for certain equipment or land uses that may be implemented within the Project area; and

- Various construction, grading, and encroachment permits allowing implementation of the Project facilities.

1.5 ORIGINAL DEIR INITIAL STUDY/NOTICE OF PREPARATION

The City of Victorville has determined that the Project has the potential to cause or result in significant environmental impacts, and warranted further analysis, public review, and disclosure through the preparation of an EIR.

A Notice of Preparation (NOP) for the original Draft EIR (original DEIR), dated July 23, 2019, was forwarded to the Governor's Office of Planning and Research, State Clearinghouse (SCH), and circulated for public review and comment. The State Clearinghouse established the comment period for the NOP as July 24 through August 22, 2019. The assigned State Clearinghouse reference for the Project is SCH No. 2019070975. The July 23, 2019 Notice of Preparation for the original DEIR, and all NOP responses are presented in Appendix A of this RDEIR.

1.6 RECIRCULATION OF THE DRAFT EIR

The original DEIR was circulated for public review and comment for a period of 45 days (March 6 through April 20, 2020). During the review period, public agencies and private parties provided comments on the original DEIR. The City has reviewed those comments and has identified potential issues of environmental concern that could benefit from modification and further discussion within a Recirculated Draft EIR (RDEIR). Additionally, the City recognizes that the recent COVID-19 pandemic has restricted public access to City facilities, as well as information available through the City, including but not limited to information presented in the original DEIR. In response to comments received to date, to facilitate distribution of information presented in the original DEIR, and encourage public participation in the EIR process generally, in its role as the Lead Agency, the City has directed the recirculation of the original DEIR in its entirety.

The City of Victorville is circulating the RDEIR for the statutory 45-day review period. Public review extends from August 14 through September 28, 2020. Notice of Availability of the RDEIR for public review was published in *Valley Wide Newspaper* on August 7, 2020.

The City of Victorville has filed a Notice of Completion (NOC) for the RDEIR with the State Office of Planning and Research to begin the public review period (Public Resources Code, Section 21161). Concurrent with the NOC, this RDEIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of this RDEIR in accordance with Public Resources Code Section 21092(b)(3).

1.7 IMPACTS NOT FOUND TO BE POTENTIALLY SIGNIFICANT

The following discussions identify those environmental issues that have been determined not to be potentially significant, and consistent with *CEQA Guidelines* Section 15143, *Emphasis*, need not be addressed in detail in the RDEIR. Accordingly, the specific issues listed are not substantively discussed within the body of this RDEIR. Any related technical studies and references are noted in the following discussions. A complete list of references is provided at the conclusion of the RDEIR. All cited materials are available at, or can be made available by contacting, the City of Victorville Planning Department. Please refer also to the original DEIR Initial Study and Initial Study Appendices presented at Appendix A to this RDEIR.

Aesthetics

The Project site is not located within a scenic vista or along a scenic highway; nor does the Project propose elements that would affect scenic vistas or scenic resources within a designated scenic highway.

There are no existing or proposed State scenic highways located within the City of Victorville. As such, the Project does not have the potential to damage scenic resources, including, but not limited to trees, rocks, outcroppings, and historic buildings within a state scenic highway.

Design and development of the Project would be regulated by the Specific Plan as amended under the Project. Project compliance with the Specific Plan and requirements established under the City Site Plan Review and Architectural Review processes would preclude the potential for the Project to substantially degrade the existing visual character or quality of the site and its surroundings.

All Project lighting would conform to applicable provisions of the Specific Plan and City of Victorville Zoning Ordinance, subject to review and approval by the City. Compliance with the Specific Plan and City Municipal Code standards would ensure that any potential light and glare impacts would be less-than-significant.

Based on the preceding, the Project would not result in potentially significant impacts for the following considerations:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; and
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Agriculture and Forest Resources

No Farmlands of Statewide Importance, Unique Farmlands or Farmlands of Local Importance occur within the City. The Project site is not designated as Prime Farmland, and no portions of the Project site are currently under active cultivation. The subject site is not zoned for agricultural uses, nor designated for agricultural purposes by the General Plan. Further, no Williamson Act contracts are in place for the proposed Project site. Additionally, no forest lands are located within the Project site or vicinity.

Based on the preceding, the Project would not result in potentially significant impacts for the following considerations:

- Conversion of 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;

- Conflict with existing zoning for agricultural use, or a Williamson Act contract;

- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned "Timberland Production;"

- Result in the loss of forest land or conversion of forest land to non-forest use; or

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Air Quality

Temporary, short-term odor releases would potentially result from Project construction activities. Potential odor sources would include, but would not be limited to: asphalt/paving materials, glues, paint, and other architectural coatings.

Construction-source odors would quickly dissipate and would not adversely affect vicinity properties. To control operational-source odors and consistent with City requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals, thereby precluding substantial generation of odors due to temporary holding of refuse on-site.

In accordance with current best management practices, and applicable Victorville Municipal Code requirements, all wastes are to be disposed of in covered receptacles and routinely removed, thereby limiting the escape of odors to the open air. It is expected that odors associated with the proposed land uses would quickly dissipate and would not adversely affect adjacent properties.

Based on the preceding, the Project would not result in a potentially significant impact for the following consideration:

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Other air quality impacts considered to be potentially significant are addressed in detail at RDEIR Section 4.3, *Air Quality*.

Biological Resources

Information presented in this Section is summarized and excerpted from *Biological Resources Assessment for APNs: 3106-261-26 (Parcel 3), 3106-261-27 (Parcel 4), 3106-261-28 (Parcel 5), and 3106-261-29 (Parcel 6) in the City of Victorville, San Bernardino County, California* [Rincon Consultants, Inc.] May 18, 2018 (Project Biological Resources Study, Initial Study Appendix B) and *Surface Water and Wetlands Evaluation for APNs: 3106-261-26 (Parcel 3), 3106-261-27 (Parcel 4), 3106-261-28 (Parcel 5), and 3106-261-29 (Parcel 6) in the City of Victorville, San Bernardino County, California* [Rincon Consultants, Inc.] May 18, 2018 (Project Water and Wetlands Evaluation, Initial Study Appendix B). The Project Biological Resources Study, Project Water and Wetlands Evaluation, and supporting Initial Study discussions substantiated the following:

- No special-status plant or wildlife are present on the Project site. There are no riparian areas or sensitive vegetation communities within or adjacent to the Project Site. No jurisdictional drainage and/or wetland features were observed within the Project Site during the field survey.

- The Project site does not lie within and does not comprise a wildlife corridor or linkage. Development of the Project would not otherwise adversely affect wildlife movement opportunities or wildlife movement corridors.

- No resources protected by local ordinances or policies are present on site. The Project site is located within the West Mojave Plan (WMP) Area. However, the City of Victorville is not a signatory to the WMP. The Project site is also located within the area covered under the Desert Renewable Energy Conservation Plan (DRECP). The Project propose commercial uses and does not comprise a renewable energy facility. The DRECP is therefore not applicable to this Project.

- Project construction activities have the potential to affect nesting birds that may be present. Mitigation incorporated in the Initial Study and carried forward in this RDEIR would reduce potential impacts to nesting birds to levels that would be less-than-significant. Please refer to RDEIR Mitigation Measure BIO-1.

Based on the preceding, Project impacts would be less-than-significant, or would be mitigated to less-than-significant levels for the following considerations:

- 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 Game or U.S. Fish and Wildlife Service;

- 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 U.S. Fish and Wildlife Service;

- Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- 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;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Cultural Resources/Tribal Cultural Resources

The Project Phase I Cultural Resources Assessment (*Phase I Cultural Resource Assessment for the CarMax Victorville Project, City of Victorville, San Bernardino County, California* (Applied EarthWorks, Inc.) June 2018 and supporting Initial Study discussions substantiate the following.

No prehistoric resources, and only four historical archaeological resources have been documented previously within a 1-mile radius of the Project area. The field survey identified no known archaeological or built-environmental resources within the Project area. Because the terrain throughout the entire Project area has been disturbed extensively by modern grading and other activities, it is unlikely that buried archaeological remains are present.

There are no known or probable historical resources of significance within the Project site. The Project site is not listed, nor eligible for listing, in the California Register of Historical Resources, or in a local register of historical resources. The Project would have

no potential to cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

Although the Cultural Resources Assessment concluded that no further cultural resource management of the property was required, Mitigation Measure CR-1 was included in the Initial Study to address the unlikely event that archaeological materials may be encountered during Project construction. Based on comments received on the original DEIR, Mitigation Measure CR-1 has been revised and is presented at RDEIR Table 1.12-1. Please refer also to RDEIR Mitigation Measures TR-1, TR-2, and TR-3.

Based on the preceding, Project impacts would be less-than-significant, or would be mitigated to less-than-significant levels for the following considerations:

- Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5; or

- Disturb any human remains, including those interred outside of formal cemeteries.

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

- 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.

Geology and Soils

The Project Geotechnical Study (*Revised Report of Geotechnical Study, Proposed Automotive Dealership, 3 Parcel Lot East of Civic Drive, Victorville, California* [Kleinfelder] August 30, 2018) (Initial Study Appendix C) and supporting Initial Study discussions substantiate the following.

There are no known active or potentially active faults, with known surface traces, traversing the City of Victorville. The site is not located within an Alquist-Priolo Special Study Zone. Additionally, the Geotechnical Study concluded that based on the distance to known active faults, surface rupture at the site is considered low. As such, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault is therefore considered less-than-significant.

Because the Project site is not located in an Alquist-Priolo Fault Study Zone, potential impacts would not be higher at the Project site than elsewhere in the region. As part of the City's standard review and approval of development projects, any new development must provide a geotechnical study for review and approval by the City Engineer, and comply with the requirements of the approved geotechnical report and Uniform Building Code (UBC) or California Building Code (CBC), as appropriate. The Geotechnical Study prepared for the Project presents site-specific design and construction requirements, and concludes that "…the proposed project is geotechnically feasible, provided the recommendations presented in this report are incorporated into the project design and construction." (Geotechnical Study, p. 9). Compliance with these requirements would reduce potential risks in this regard to acceptable levels. The Project does not propose

uses or activities that would contribute to or exacerbate any existing strong seismic groundshaking hazard conditions. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic groundshaking is considered less-than-significant.

Groundwater was not encountered within the exploratory borings (maximum depth of 50 feet below ground surface) performed as part of the Geotechnical Study. The Study determined that the potential for liquefaction on the site is considered remote. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving liquefaction is considered less-than-significant.

The Geotechnical Study concluded that risk at the site from landslides is very low. Based on the preceding, the potential for the Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides is considered less-than-significant.

Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a City-approved Storm Water Pollution Prevention Plan (SWPPP). Further, the proposal involves the redevelopment of a portion of an already-developed site; as such, the Project does not propose to significantly alter existing topography and would not substantively affect existing erosion conditions. On this basis, the potential for the Project to result in substantial soil erosion or the loss of topsoil is considered less-than-significant.

The Geotechnical Study provides recommendations and development/design protocols addressing potentially unstable or otherwise unsuitable soils that may be encountered. Mitigation was incorporated in the Initial Study and is carried forward in this RDEIR that would reduce potential soils impacts to levels that would be less-than-significant. Please refer also to RDEIR Mitigation Measure GEO-1.

The upper soils within the Project site generally consisted of sandy silts and silty sands. Based on the granular nature of these soils, the Geotechnical Study concluded that the expansion potential at the site is considered low and impacts would be less-than-significant.

Based on research conducted as part of the Project Cultural Resources Assessment, it was concluded that shallow excavations in the younger Quaternary alluvium found at the surface of the site are unlikely to uncover significant fossilized vertebrate remains. However, any deeper excavations that extend down into the older Quaternary sediments found in the north-central portion of the proposed Project area may well yield significant vertebrate fossils. To address this potential impact, Mitigation Measure GEO-2 was incorporated in the Initial Study. Mitigation Measure GEO-2 has been revised in response to comments received on the original DEIR and is presented at RDEIR Table 1.12-1.

Sewer service currently exists at the Project site. No septic tanks or other alternative wastewater disposal systems are proposed. The Project would have no potential to result in adverse effects associated with septic tanks or alternative wastewater disposal systems.

Based on the preceding, Project impacts would be less-than-significant, or would be mitigated to less-than-significant levels for the following considerations:

- Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking;

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction;

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides;

- Result in substantial soil erosion or the loss of topsoil;

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property;

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or

- Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Hazards and Hazardous Materials

The Project Phase I Environmental Site Assessment (*Phase I Environmental Site Assessment, Proposed Automotive Dealership, APNS 3106-261-26, 3106-261-27, 3106-261-28 and 3106-261-29, Victorville, California* (Kleinfelder) June 19, 2018, Phase I ESA (Initial Study Appendix D) and supporting Initial Study discussions substantiate the following:

- The Phase I ESA revealed no evidence of recognized environmental conditions

(RECs),[2] controlled RECs (CRECs), historical RECs (HRECs), or de minimis conditions affecting the Project site. Based on the results of the Phase I ESA, the risk of environmental impairment at Project site is low (Phase I ESA, p. 2). Mandated compliance with regulations governing hazardous materials would minimize or preclude potential hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials. The potential for the Project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment is therefore considered less-than-significant.

- The Project site is not located within one-quarter mile of an existing or proposed school. The school nearest the site is Imogene Garner Hook Junior High School, located just over one-half mile westerly of the Project site. The Project does not include elements or aspects that would create or otherwise result in hazardous emissions. The potential for the Project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school is therefore considered less-than-significant.

- Federal, State, and local databases were reviewed to determine if the Project site has been identified as having environmental concerns. Based on the research conducted, the Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. It is also noted that the Phase I ESA concluded that off-site properties would not pose substantive hazardous risk(s) to the Project site (Phase I ESA, p. 12, et al.). On this basis, there is no potential for the Project to 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, create a significant hazard to the public or the environment.

[2] RECs are defined, according to ASTM E1527-13 as "*the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not RECs.*"

- The Southern California Logistics Airport and Osbourne Airport (private) are both located over 5 miles northwesterly and northeasterly, respectively, of the Project site. No other public or private airstrips exist, or are proposed proximate to the Project. Due to physical separation between the Project site and the closest airport facilities, as well as land use regulations which preclude or restrict development within airport approach/departure zones, potential air safety impacts are considered less-than-significant.

- Development of the Project would not cause permanent alteration to vehicle circulation routes, and would not interfere with any identified emergency response or emergency evacuation plan. In accordance with City policies, coordination with the local fire and police departments during construction would ensure that potential interference with emergency response and evacuation efforts are avoided. Further, potential temporary traffic/access disruption that may during Project construction would be addressed through the implementation of the Project Construction Traffic Management Plan (see: RDEIR Section 2.0, *Project Descriptio*n; 2.5.14, *Construction Traffic Management Plan*). The potential for the Project to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is therefore considered less-than-significant.

- Fire protection services for the Project site and vicinity are currently available through the Victorville Fire Department. Urban fire hazards within the City are largely related to structural fires, and are typically due to carelessness and/or negligence. Adherence to local fire department building and site design requirements, and compliance with codified fire protection and prevention measures during construction and operation of the Project are required. On this basis, the potential for the Project to expose people or structures to a significant risk of loss, injury or death involving wildland fires is determined to be less-than-significant.

Based on the preceding, the Project would result in less-than-significant impacts, or no impacts under the following topics:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Section 65962.5 and, as a result, create a significant hazard to the public or the environment;

- 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, result in a safety hazard or excessive noise for the people residing or working in the project area;

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Hydrology and Water Quality

The Project Hydrology Report (*CarMax Hydrology Report* [Michael Baker International] August 21, 2018) (Initial Study Appendix E) and supporting Initial Study discussions substantiate the following.

Discharge of pollutants from the Project site and all areas of the City would be minimized through programs and performance standards established under the National Pollutant Discharge Elimination System (NPDES). NPDES requires local governments to obtain an NPDES Permit for stormwater-induced water pollutants in their jurisdiction. The State Water Resources Control Board (SWRCB) General Permit and Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) was adopted in 2003 to provide NPDES permit coverage to small MS4s required to comply with federal storm water permitting requirements. The Mojave Watershed Group of Small Communities enrolled under the statewide Phase II Municipal Storm Water NPDES General Permit that includes the cities of Victorville, Apple Valley, Hesperia and portions of San Bernardino County. These co-permittees comply with General Permit provisions.

Consistent with MS4 Permit requirements, the Applicant would be required to develop and implement a construction Storm Water Pollution Prevention Program (SWPPP) acting to reduce and control potential erosion, siltation, and discharge of pollutants during Project construction.

Post-construction Project operations would comply with the Project's mandated City-approved Water Quality Management Plan (WQMP) to minimize storm water pollutants of concern and document implementation of required BMPs.

Compliance with City requirements to include required implementation of the Project SWPPP and WQMP would ensure that construction and operation of the Project would not violate any water quality standards or waste discharge requirements. Based on the preceding discussion, the Project's potential to violate any water quality standards or waste discharge requirements is considered less-than-significant.

Development of the Project would not contribute to groundwater depletion, nor discernibly interfere with groundwater recharge. The Project site is currently served by the municipal water system; the Project does not propose or require direct withdrawal of groundwater. Further, construction proposed by the Project would not involve substructures or other intrusions at depths that would significantly impair or alter the direction or rate of flow of groundwater. The Project site is not a designated groundwater recharge area and the Project does not propose or require facilities or actions that would otherwise affect designated groundwater recharge areas. On this basis, the potential for the Project to substantially deplete groundwater supplies or interfere substantially with groundwater recharge is considered less-than-significant.

Under existing conditions, storm waters sheet flow and disperse toward adjacent properties from a central high point within the Project site. Under post-development conditions, the Project site would include the central CarMax facility with associated parking areas located along the north, east, and southwest corner of the property. Storm water runoff from the Project site would not increase under post-development conditions. Nor would the Project adversely affect existing drainage patterns. There are no streams or rivers within the Project site, or that would otherwise be substantively affected by the Project. On this basis, the potential for the Project to substantially alter the existing drainage pattern of the site or surrounding area; or substantially increase the rate or amount of surface runoff in a manner that would result in erosion or flooding on- or off-site is considered less-than-significant.

The Project storm water management concept provides that post-development storm water discharge rates would not exceed pre-development conditions. The Project uses would generate typical storm water urban pollution constituents. The Project would implement required storm water quality control measures, minimizing potential effects of any discharged constituents. On this basis, the Project's potential to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff is considered less-than-significant.

Wastewater generated by the Project would be conveyed by the municipal sewer system for treatment at the Victor Valley Wastewater Reclamation Authority (VVWRA) Treatment Plant. The VVWRA Treatment Plant provides tertiary treatment, minimizing the potential for treated wastewater effluent to adversely affect area water quality. Compliance with applicable MS4 Permit requirements supported by the Project's WQMP minimizes the potential for storm water discharges from the Project site to adversely affect area water quality. The Project does not propose or require facilities or operations that would otherwise result in potentially significant water quality impacts. On this basis, the potential for the Project to otherwise substantially degrade water quality is considered less-than-significant.

Residential uses are not proposed as part of the Project. Additionally, as illustrated at General Plan Figure S-2, *Flood Hazards Map*, the Project site is not located within a 100-year flood hazard area. The Project would therefore have no potential to place housing within a 100-year flood hazard area; or place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Due to the distance to the nearest developed areas, and precautions built into the holding basins below Lake Silverwood and in the Deep Creek area just before the water enters the Mojave River, the probability of extreme flood [resulting from dam failure] is unlikely."[3] Additionally, the Project does not propose or require uses or facilities that would contribute to or exacerbate flood hazards. As such, the potential for the Project to create or expose people or property to a significant risk of loss due to flood hazards is therefore considered less-than-significant.

The Project site is not located near any bodies of water or water storage facilities that would be considered susceptible to seiche. No slopes of significance have been identified on or near the Project site, and the Project site has not historically been affected by mudflows. The Project site is not proximate to any coastal waters and would not be subject to tsunami hazards. The Project does not propose or require uses or facilities that

[3] City of Victorville General Plan, page S-5.

would contribute to or exacerbate seiche, tsunami or mudflow flood hazards. The potential for the Project to expose people or structures to a significant risk due to seiche, tsunami, or mudflow is therefore considered less-than-significant.

Based on the preceding, the Project would result in less-than-significant impacts, or no impacts under the following topics:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin;

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

    - result in substantial erosion or siltation on- or off-site;

    - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

    - create or contribute runoff water that would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

    - impede or redirect flood flows;

- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Land Use and Planning

The Project involves the development of auto dealership uses on a currently vacant site. No residents would be displaced by Project-related activities, nor would the physical arrangement of the surrounding residential communities be modified or divided. The Project would therefore have no potential to physically divide an established community.

Other land use and planning impacts considered to be potentially significant are addressed in detail at RDEIR Section 4.1, *Land Use and Planning*.

Mineral Resources

The General Plan recognizes the potential for occurrence of mineral resources along the Mojave River corridor, and designates these areas "MRZ-2b" (General Plan Figure RE-1, *Victorville Planning Area Mineral Land Classification Map*). The Project site is located approximately two miles westerly of the Mojave River corridor. The Project does not propose uses or facilities that would be located, in or otherwise substantively affect the Mojave River corridor or areas designated MRZ-2b.

General Plan Figure RE-1 indicates that the Project site and the predominance of the City of Victorville are designated as a "MRZ-3a" mineral resource zone. The MRZ-3a zone is defined by the General Plan Resource Element as "[a]reas containing known mineral occurrences of undetermined mineral resource significance."

The Project site and adjacent properties are designated for commercial development under the General Plan, and are not designated, planned, or anticipated as areas for extraction or recovery of mineral resources. There are no known or probable mineral resources of local, regional or state importance within the Project site. The Project does not propose or requires facilities or operations that would substantively affect any offsite mineral resources.

As such, the Project would result in no impacts for the following mineral resources considerations:

- Loss of availability of a known mineral resource that would be of value to the region and to the residents of the state;

- Loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Noise

The Project site is not located within an airport land use plan, nor is it located within 2 miles of any airport or private airstrip. The Southern California Logistics Airport and Osbourne Airport (private) are both located over 5 miles northwesterly and northeasterly, respectively, of the Project site. Physical separation of the Project site from the airfield facilities acts to preclude potential effects of airport facilities, their operations or related airfield/aircraft noise. Further, the Project does not propose elements or aspects that would interact with or contribute to airfield/aircraft noise. As such, the Project would have less-than-significant impacts for the following potential noise impact consideration:

- 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, expose people residing or working in the project area to excessive noise levels.

Other noise impacts considered to be potentially significant are addressed in detail at RDEIR Section 4.5, *Noise*.

Population and Housing

The Project does not propose new residential development and would not directly contribute to population growth within the City. Employment generated by the Project may contribute to nominal population growth; however, Project-related employment demands would likely be filled by the existing personnel pool within the City and neighboring communities. Further, the Project site is located within an area that is already served by roadways, utilities, and other infrastructure. As such, the Project would not contribute directly or indirectly to substantial population growth.

The Project would be implemented on vacant property. Housing does not exist within the Project site. Nor is the Project site designated for, or anticipated to be developed with, housing assets. The Project does not otherwise propose or require the displacement of any on-site or off-site housing stock. There is no resident population within the Project site, nor does the Project propose uses or activities that would displace off-site populations.

Based on the preceding, the Project would have no or less-than-significant impacts for the following population and housing considerations:

- Induce substantial unplanned population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure); and

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Public Services

Based on the current availability of services, and the conventional land uses and building designs proposed by the Project, it is not anticipated that Project demands would result in the need for new or expanded fire and police protection services. Additionally, the fire and police departments would have an opportunity to review specific design plans and identify project conditions for development.

The Project is not expected to result in an identifiable increase in employees or residents (and thus, students) within the City. Further, prior to the issuance of building permits, the Project is required to pay school impact fees consistent with California Government Code Section 65995 and development impact fees, which help to fund parks.

Development of the Project would require established public agency oversight, including but not limited to: actions by the City Planning and Building and Safety Divisions, City Public Works Department, San Bernardino County Sheriff, Victorville Fire Department,

Victorville Police Department and/or Caltrans. These actions typically fall within routine tasks of these agencies under current staffing, and within existing facilities. Agency activities are financially supported by established plan check and inspection fees. Additionally, police and fire services are funded from both property tax and sales tax revenues generated by the Project.

Based on the preceding, the Project would have a less-than-significant impact for the following public services consideration:

- 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 fire protection, police protection, schools, parks, or other public facilities.

Recreation

Development of the Project would not substantively affect the City resident population, nor demonstrably affect population-driven demands for regional parks or other recreational facilities. Additionally, development impact fees required of the Project help to fund recreational facilities within the City, minimizing the possibility that the Project would cause or result in physical deterioration of recreational facilities.

On this basis, the Project would result in less-than-significant impacts for the following considerations:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration of the facility would occur or be accelerated; and

- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Utilities and Service Systems

Project-generated wastewater would be typical of commercial sources, and would not require treatment beyond that provided by existing and programmed facilities. The Project would be developed and operated in compliance with the City regulations and standards of the Regional Water Quality Control Board (RWQCB), acting to ensure that wastewater treatment requirements are achieved. The Project would be required to comply with applicable MS4 Permit requirements, acting to reduce Project wastewater treatment demands.

The City General Plan EIR substantiates that sufficient wastewater treatment capacity exists, or would be available to support wastewater treatment demands of the City under buildout conditions (General Plan EIR, pp. 5.16-31 – 5.16-36).

Wastewater treatment facilities specifically assigned to the Project, or constructed to serve the Project are not required. The Project does not require or propose construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Water would be provided to the Project by the Victorville Water District (VWD). The City General Plan EIR substantiates that sufficient treated water supplies are available, or would be available to support water demands of the City under buildout conditions (General Plan EIR, pp. 5.16-31 – 5.16-36). On this basis, the General Plan EIR concludes that buildout of the City pursuant to the General Plan would result in less-than-significant water supply and water treatment impacts.

The Project land uses are consistent with the adopted General Plan and the Project water supply and water treatment demands are reflected in the General Plan EIR conclusion regarding water supply and water treatment impacts. Water supply or water treatment

facilities specifically assigned to the Project, or constructed to serve the Project are not required.

Development and water demands of the City pursuant to the General Plan is reflected in the Victorville Water District 2015 Urban Water Management Plan (2015 UWMP). Conclusions regarding adequacy of water supplies to the Project are borne out and further supported by the 2015 UWMP. Relevant 2015 UWMP discussion is excerpted in pertinent part below:

> VWD's 2015 demands were 20,569 acre feet (AF), which are substantially reduced from prior years due to ongoing conservation efforts and a severe multi-year drought that resulted in a series of executive orders from the governor mandating 25% statewide conservation.
>
> Senate Bill x 7-7 (SBX7-7), also known as the Water Conservation Bill of 2009, requires all water suppliers to increase water use efficiency with the overall goal to decrease per-capita water consumption within the state by 20 percent by the year 2020. SBX7-7 specified methodologies for determining the baseline water demand, 2015 interim urban water use target and the 2020 urban water use targets. The baseline and targets were required to be reported in the 2010 UWMP for each urban retail water supplier. This Plan is required to assess compliance with the 2015 interim urban water use target and monitor progress toward compliance with the 2020 urban water use target. The VWD baseline per capita demand is 253 gallons per capita per day (gpcd), the 2015 Interim Target is 227 GPCD, and the 2020 Target is 202 gpcd. VWD's actual 2015 GPCD was 143, which surpasses the 2020 Target. The development of the per-capita demand targets is discussed in further detail in Chapter 5.

This Plan concludes that VWD has adequate supplies to meet demands during average, single dry and multiple dry years throughout the 25-year planning period. VWD will continue aggressive water conservation efforts, increased use of recycled water to offset

potable water demand, and participation in new water supply projects with MWA to ensure that supplies continue to meet current and projected demands (2015 UWMP, p. 1).

Solid waste generated by the Project would be conveyed to the Victorville Landfill (Landfill). The Landfill is operated by the Solid Waste Management Division of the San Bernardino County Public Works Department in accordance with a Waste Disposal Agreement between the City and the County. The City General Plan EIR substantiates that sufficient landfill capacity exists or would be available to support solid waste disposal demands of the City under buildout conditions (General Plan EIR, pp. 5.16-44 – 5.16-46).

Based on the preceding, the Project would result in no impacts or less-than-significant impacts under the following topics:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;

- 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;

- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;

- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Wildfire

According to CAL FIRE Fire Hazard Severity Zone Maps, the Project area is not located within or near a state responsibility area, or within an area classified as a very high fire hazard severity zone.

Fire protection services for the Project site and vicinity are currently available through the Victorville Fire Department. The Project would be required to comply with applicable City fire prevention and protection requirements.

Based on the preceding, the Project would result in less-than-significant impacts under the following topics:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;

- 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;

- 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; or

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

1.8 AREAS OF CONCERN OR CONTROVERSY

Section 15123 of the *CEQA Guidelines* requires that the EIR summary identify areas of potential concern or controversy known to the lead agency, including issues raised by other agencies and the public. Issues of concern were identified by the Lead Agency,

through responses to the original DEIR Initial Study/Notice of Preparation, and the other communications addressing the Project and the Project EIR.

Responses to the original DEIR NOP are presented at RDEIR Appendix A. Table 1.8-1 lists NOP respondent agencies, organizations, and individuals. A corresponding summary of respondent comments is presented, indicated by *italicized text*. Responses to comments, together with correlating EIR references are indicated in subsequent statements. Unless otherwise noted, all respondent comments are addressed within the body of the RDEIR.

Table 1.8-1
List of NOP Respondents and Summary of Comments/Responses

Respondent	Summary of Comments
State Agencies	
Office of Planning and Research-State Clearinghouse (SCH)	*SCH lists Responsible and Trustee Agencies receiving the NOP. SCH assigns the SCH No. 2019070975 to the Project environmental documents. SCH established the review and comment period for the NOP as July 24 through August 22, 2019.* EIR Appendix A includes a copy of the Project NOP and NOP Responses.
Native American Heritage Commission (NAHC)	*NAHC provides procedural guidance in evaluating and determining potential impacts to cultural resources and Tribal Cultural Resources (TCRs).* As discussed in the Project Initial Study, there are no known cultural resources identified within the Project site or vicinity. To ensure avoidance of adverse impacts to any cultural or tribal cultural resources that may be encountered during development activities, Mitigation Measures CR-1, TR-1, TR-2, and TR-3 (provided in Table 1.12-1) are incorporated in the Project.
Regional Agencies	
Mojave Desert Air Quality Management District (MDAQMD)	*MDAQMD concurs with the preliminary analyses presented in the Initial Study. MDAQMD recommends that the City require various fugitive dust control measures to be implemented during Project construction.* Evaluation of potential Project air quality impacts is presented at EIR Section 4.3, *Air Quality*. The City would require that prior to issuance of a grading permit, the Applicant prepare and submit to the MDAQMD a dust control plan that describes dust control measures to be employed during Project construction activities. The Applicant would implement all fugitive dust control measures required by the City. Please refer also to the Project Air Quality Impact Analysis (AQIA), EIR Appendix C.

1.9 RDEIR TOPICAL ISSUES

Based on the Initial Study analysis, NOP comments, and other public/agency input, the analysis of the RDEIR addresses the following topics:

- Air Quality;
- Energy;
- Greenhouse Gas Emissions;
- Land Use and Planning;
- Noise; and
- Transportation.

Additionally, RDEIR Section 5.0, *Other CEQA Considerations*, presents discussions of other mandatory CEQA topics including:

- Cumulative Impact Analysis;
- Alternatives Analysis;
- Growth-Inducing Impacts of the Proposed Action;
- Significant Environmental Effects; and
- Significant and Irreversible Environmental Changes; and

1.10 SUMMARY OF SIGNIFICANT and UNAVOIDABLE PROJECT IMPACTS

As substantiated herein, the Project would not result in or cause any significant and unavoidable environmental impacts. All Project environmental impacts would be less-than-significant, or less-than-significant as mitigated.

A summary of all Project impacts and proposed mitigation measures is presented at RDEIR Section 1.12, *Summary of Impacts and Mitigation*.

1.11 ALTERNATIVES TO THE PROJECT

1.11.1 Description of Alternatives

For illustrative and informational purposes, this EIR evaluates alternatives to the Project that would further diminish the Project's already less-than-significant impacts. Alternatives to the Project considered in detail within this EIR include:

- No Project Alternative;
- Reduced Intensity Alternative; and
- Alternative Sites.

Alternatives to the Project that are considered in this analysis are summarized below. Please refer also to RDEIR Section 5.2.2, *Description of Alternatives*.

1.11.1.1 No Project Alternative Overview

The *CEQA Guidelines* specifically require that an EIR include evaluation of a No Project Alternative. The No Project Alternative should make a reasoned assessment as to future disposition of the subject site should the Project under consideration not be developed. In this latter regard, the *CEQA Guidelines* state in pertinent part:

> "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result

> of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (*CEQA Guidelines*, Section 15126.6 (e)(3)(b))."

In the case considered here, the subject site is a vacant and available property absent any significant environmental or physical constraints. Further, the Project area is fully served by proximate available utilities and supporting public services; and is provided appropriate access. Areas around the subject site are developed with or are being developed with urban uses. The Project area is not substantively constrained by physical conditions or environmental considerations.

Given the availability of infrastructure/services, lack of environmental or physical constraints; and proximity of other urban development, it is considered unlikely that the subject site would remain vacant or in a "No Build" condition. Evaluation of a No Build condition would therefore "analyze a set of artificial assumptions that would be required to preserve the existing physical environment." This is inconsistent with direction provided at *CEQA Guidelines*, Section 15126.6 (e)(3)(b), as presented above. On this basis, a No Build condition is rejected as a potential No Project Alternative.

Evaluated No Project Alternative

In light of the preceding discussions, for the purposes of this Alternatives Analysis, and to provide for analysis differentiated from the Project, the No Project Alternative considered herein assumes development of the Project site allowed under the site's current General Plan Land Use and Zoning designations. Under the No Project Alternative, it is assumed that the entire 4.76-acre Project site would be developed with commercial uses currently allowed under the Civic Center Community Sustainability Specific. For the purposes of this Alternatives Analysis, the site is assumed to be developed with general retail merchandise uses at a mid-range development intensity (assumed at a 0.25 floor-to-area ratio [FAR]) allowed under the Specific Plan CC-2

District.[4] Translated over the entire 4.76-acre site, this would yield approximately 51,800 square feet of commercial development under the No Project Alternative.

The No Project Alternative would increase transportation impacts, air quality impacts, GHG emissions impacts, and vehicular-source noise impacts when compared to the Project. As with the Project, transportation impacts would be significant and unavoidable. Other impacts under the No Project Alternative, though increased when compared to the Project, would likely be less-than-significant or could be mitigated to levels that would be less-than-significant.

1.11.1.2 Reduced Intensity Alternative Overview

Evaluated Reduced Intensity Alternative

For purposes of the EIR Alternatives Analysis, the Reduced Intensity Alternative is based on an overall reduction in Project trip generation of 25 percent. To achieve the 25 percent reduction in trip generation, the scope of Project uses could be reduced, and/or the types and variety of occupancies proposed by the Project could be modified.

The Reduced Intensity Alternative would further diminish already less-than-significant impacts otherwise occurring under the Project.

1.11.1.3 Alternative Sites

Potential alternative sites for the Project are evaluated at RDEIR Section 5.0. As discussed in the body of this RDEIR, the Project would not result in any significant environmental effects. An overview of the Project potential effects if located at an alternative site is nonetheless presented here for illustrative and informational purposes.

1.11.1.4 Environmentally Superior Alternative

The *CEQA Guidelines* require that the environmentally superior alternative (other than the No Project Alternative) be identified among the Project and other Alternatives

[4] The CC-2 District allows development at up to 0.50 FAR.

considered in an EIR. Already less-than-significant environmental effects of the Project would be generally diminished under the Reduced Intensity Alternative. On this basis, and for informational purposes, the Reduced Intensity Alternative would be considered the "environmentally superior alternative." However, under the Reduced Intensity Alternative, only limited attainment of Project Objectives would be achieved. It is also again noted that the Project would not result in any significant and unavoidable environmental effects, and the discussion of Alternatives presented herein is provided for illustrative and informational purposes only.

1.12 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.12-1 summarizes potential impacts resulting from implementation and operations of the Project. The impacts identified in Table 1.12-1 correspond with environmental topics and impacts discussed in RDEIR Section 4.0, *Environmental Impact Analysis*. Table 1.12-1 also lists measures proposed to mitigate potentially significant environmental impacts of the Project and indicates the level of significance after application of proposed mitigation.

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
4.1 Land Use and Planning			
Physically divide an established community.	No Impact	No Mitigation Measures Are Required	Not Applicable
Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
4.2 Transportation			
LOS Analysis			The City recognizes that vehicle delay (Level of Service, LOS) deficiencies are no longer environmental impacts under CEQA. Although not specifically relevant to an analysis of CEQA transportation impacts, City General Plan Policies and City Traffic Impact Study Guidelines require LOS analysis for new development projects. For this reason, although LOS cannot be used to make a conclusion of a significant environmental effect, analysis of Project-related LOS deficiencies is provided herein for City use and informational purposes. Discussions of "traffic impacts" presented in the Project TIA (RDEIR Appendix B) are amended accordingly by reference.

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
Opening Year (2021) Conditions, Horizon Year (2031) Conditions, Horizon Year (2031) Vacant Parcel Development Scenario			
- Intersection LOS Deficiencies	N/A	N/A	LOS deficiencies are no longer environmental impacts under CEQA. Project-related intersection LOS deficiencies are addressed through City Conditions of Approval, presented below: *4.2.1 Prior to issuance of the first development permit, the Applicant shall pay fair share fees toward the installation of a future traffic signal at the intersection of Project Driveway No. 1 at Civic Drive (Study Area Intersection No. 1).* *4.2.2 Subsequent to Project Opening, the City will require development project applicants for the vacant properties east of Civic Drive, south of Roy Rogers Drive to evaluate Study Area Intersections No. 1 and No. 2. Said traffic studies are to include traffic signal warrants.* *4.2.3 Subsequent to Project Opening, the City will require development project applicants for the vacant properties east of Civic Drive, south of Roy Rogers Drive, to evaluate*

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
			Study Area Intersection No. 5 (Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive) to determine how timing of the existing signal at this location can be adjusted in order to maintain adequate LOS. Said studies will be submitted to Caltrans for their review.
- Roadway Segment LOS Deficiencies	N/A	N/A	LOS deficiencies are no longer environmental impacts under CEQA. The Project would not cause or result in any roadway segment LOS deficiencies.
CMP Intersections LOS Deficiencies	N/A		LOS deficiencies are no longer environmental impacts under CEQA. CMP intersection deficiencies are coincident with intersection LOS deficiencies identified herein. Intersection LOS deficiencies are addressed through City Conditions of Approval 4.2.1, 4.2.2, 4.2.3.
Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subd. (b).	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Result in inadequate emergency access.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
4.3 Air Quality			
Conflict with or obstruct implementation of the applicable air quality plan (AQMP).	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Expose sensitive receptors to substantial pollutant concentrations.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
4.4 Greenhouse Gas Emissions			
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less-Than-Significant	*4.4.1 The Project shall implement Screening Table Measures that achieve at least 45 points per the Screening Tables. The City shall verify that Screening Table Measures achieving the 45-point performance standard are incorporated in development plans prior to the issuance of building permit(s) and/or site plans (as applicable). The City shall verify implementation of the selected Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. At the discretion of*	To facilitate implementation and monitoring of the Project CAP Screening Table Measures, Mitigation Measure 4.4.1 is incorporated in the RDEIR.

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		the City, measures that provide GHG reductions equivalent to GHG emissions reductions achieved via the Screening Table Measures may be implemented.	
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less-Than-Significant	As above.	As above.
4.5 Noise			
Project construction activities and associated noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Project-related off-site traffic noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Project operational/area-source noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.			
Project would result in generation of excessive groundborne vibration or groundborne noise.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
4.6 Energy			
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less-Than-Significant	No Mitigation Measures Are Required	Not Applicable
Mitigation Measures Carried Forward from the Initial Study (Please refer also to Appendix A)			
IV. Biological Resources			
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 Game or U.S. Fish and Wildlife Service.	Potentially Significant	***BIO-1*** *Nesting Birds. If Project activities must occur during the avian nesting season (February to September), a survey for active nests shall be conducted by a qualified biologist, no more than three (3) days prior to the start of activities. If active nests are identified and present onsite, the qualified biologist shall establish an appropriate nest buffer with flagging and stakes or construction fencing that does not pose an entanglement risk to wildlife. All Project activities within 0-300 feet of the nest, depending on the species (50 feet for passerines*	Less-Than-Significant

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		and up to 300 feet for raptors), shall be postponed until the nest is vacated and juveniles have fledged, and there is no evidence of a second attempt at nesting. The qualified biologist shall monitor the nest at the onset of Project activities and at the onset of any changes in Project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the qualified biologist determines that Project activities may be causing an adverse reaction, the qualified biologist shall adjust the buffer accordingly. Construction personnel shall be instructed regarding the ecological sensitivity of the flagged or fenced area. The qualified biologist shall have the authority to stop work if nesting individuals or pairs exhibit signs of disturbance.	
V. Cultural Resources			
Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.	Potentially Significant	***CR-1*** *A. Prior to the issuance of the first grading permit, the Applicant shall provide a letter to the City of Victorville Planning Department, or designee, from a qualified professional archeologist stating that the Project Archaeological Monitor has been retained to provide on-call services in the event archeological resources are encountered.* *B. The Project Archaeological Monitor shall be present at the pre-grading conference to establish procedures for archeological resource surveillance. In the event a previously unrecorded archaeological deposit is encountered during construction, all activity within 50 feet of the area of discovery shall cease and the City shall*	Less-Than-Significant

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		be immediately notified. The Project Archaeological Monitor shall be contacted to flag the area in the field and determine if the archaeological deposits meet the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique archaeological resource (Public Resources Code 21083.2(g)). *C. If the find is considered a "resource" the Project Archaeological Monitor shall pursue either protection in place or recovery, salvage and treatment of the deposits. The Project Archaeological Monitor and a Native American Monitor shall evaluate all archaeological resources unearthed by Project construction activities. If the resources are Native American in origin, they shall have the opportunity to consult with the City and/or Project developer(s) on appropriate treatment and curation of these resources.* *D. If unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage and treatment shall be required at the Applicant's expense. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4.* *E. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the Project Archaeological Monitor. Resources shall be identified and curated into an*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		established accredited professional repository. The Project Archaeological Monitor shall have a repository agreement in hand prior to initiating recovery of the resource. Excavation as a treatment option will be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the Project. *F. Final Report. Within 60 days of completion of grading, excavation and ground-disturbing activities at the site, the Project Archaeological Monitor shall prepare a Final Mitigation and Monitoring Report (Final Report). The Final Report shall document monitoring activities conducted by the Project Archaeologist. This report shall:* • *Document the impacts to the known resources on the property.* • *Describe how each mitigation measure was fulfilled;* • *Document the type of cultural resources recovered and the disposition of such resources;* • *Provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting;* • *In a confidential appendix, include the daily/weekly monitoring notes from the archaeologist.* • *All reports produced shall be submitted to the City, and Eastern Information Center.* *See also: MMs TR-1, TR-2, TR-3.*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	Potentially Significant	*Please refer to Mitigation Measure CR-1.*	Less-Than-Significant
VII. Geology and Soils			
Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Potentially Significant	***GEO-1*** *Prior to the issuance of grading permits, and to the satisfaction of the City, the Project Applicant shall ensure that the recommendations, performance standards and requirements established within the Final Project Geotechnical Study are incorporated into the Project design and construction plans. A qualified geotechnical engineer shall be retained on site to ensure that Project implementation is realized in conformance with specifications and requirements identified in the Study.*	Less-Than-Significant
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant	***GEO-2*** *Prior to the issuance of the first grading permit, the Applicant shall provide a letter to the City of Victorville Planning Department, or designee, from a qualified professional paleontologist (Project Paleontological Monitor) stating that the Project Paleontological Monitor has been retained to provide on-call services in the event paleontological resources are encountered.* *The Project Paleontological Monitor shall develop an acceptable monitoring and fossil remains treatment plan (Paleontological Management Treatment Plan - PMTP) for construction-related activities that could disturb potential unique paleontological resources within the Project area. Minimum provisions of the PMTP are outlined below:*	Less-Than-Significant

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		• *Paleontological monitoring shall be conducted during all grading and trenching operations. Monitoring shall be conducted intermittently during initial cuts until the Quaternary deposits (if any) are encountered. Once Quaternary deposits are identified, paleontological monitoring shall be conducted on a full-time basis.* • *The Project Paleontological Monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.* • *Recovered specimens shall be prepared to a point of identification and permanent preservation, including screen-washing sediments to recover small invertebrates and vertebrates if indicated by the results of test sampling.*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		• *All recovered fossils shall be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, shall be the responsibility of the developer(s).* *Within 60 days of completion of grading, excavation and ground-disturbing activities at the site, the Project Paleontological Monitor shall prepare a Final Mitigation and Monitoring Report (Final Report). The Final Report shall identify findings and significance of findings, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution shall be included in the Final Report. The Final Report, when submitted to and accepted by the Lead Agency (City of Victorville), shall signify satisfactory completion of mitigation of potential impacts to paleontological resources.*	
XVIII. Tribal Cultural Resources			
Cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency to be significant.	Potentially Significant	***TR-1 Tribal Monitoring – General.*** *Prior to the issuance of a grading permit, the Project Applicant shall contact the consulting tribes with notification of the proposed grading and shall enter into a Tribal Cultural Resources Treatment and Monitoring Agreement with each Tribe that determines its tribal cultural resources may be present at the site. The*	Less-Than-Significant

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		agreements shall include, but not be limited to, outlining provisions and requirements for addressing the handling of Tribal cultural resources; Project grading and development scheduling; terms of compensation for the Tribal monitors; treatment and final disposition of any tribal cultural resources, including but not limited to sacred sites, burial goods and human remains discovered at the site; and establishing on-site monitoring provisions and/or requirements for professional Tribal monitors during all ground-disturbing activities. The terms of the agreements shall not conflict with any of these mitigation measures. A copy of the agreement shall be provided to the City of Victorville Planning Department prior to the issuance of a grading permit. ***TR-2 Tribal Cultural Resources – Archaeological Monitoring.*** *At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities at the site take place, the Project Applicant shall retain a Secretary of Interior Standards-qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Ground-disturbing activities may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, weed abatement, boring, grading, excavation, drilling, and trenching. The on-site monitoring would end when the Project site grading and excavation activities are completed, or when the*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		monitor has indicated that the site has a low potential for archeological resources. *The Project Archaeologist, in consultation with interested Tribes and the Developer, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the Project site. Details in the Plan shall include:* *A. Project grading and development scheduling.* *B. The development of a rotating or simultaneous schedule in coordination with the Project Applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting Tribes during grading, excavation and ground-disturbing activities at the site.* *C. The safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists.* *D. The protocols and stipulations that the Developer, Tribes and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.* ***TR-3 Treatment and Disposition of Tribal Cultural Resources**. If tribal cultural resources are inadvertently discovered during ground-disturbing*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		actives for this Project, the following procedures will be carried out for treatment and disposition of the discoveries: *A. Temporary Curation and Storage. During the course of construction, all discovered resources shall be temporarily curated in a secure location on-site or at the offices of the Project Archaeologist. The removal of any artifacts from the Project site will need to be thoroughly inventoried by the Project Archeologist with tribal monitor oversight of the process.* *B. Treatment and Final Disposition. The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The landowner shall relinquish the artifacts through one or more of the following methods and provide the City Planning Department with documentation of same:* *a. Reburial on-site. Accommodate the process for on-site reburial of the discovered items with the consulting Tribes. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.* *b. Curation. A curation agreement with an appropriate qualified repository within San Bernardino County that meets federal standards*	

Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		pursuant to 36 CFR Part 79, and therefore, would be professionally curated and made available to other archaeologists or researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Bernardino County, to be accompanied by payment of the fees necessary for permanent curation. *c. Disposition Dispute. If more than one Tribe is involved with the Project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center.* *d. Final Report. At the completion of grading, excavation and ground-disturbing activities at the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the Project Archaeologist and Tribal Monitors within 60 days of completion of grading. This report shall:* • *Document the impacts to the known resources on the property;* • *Describe how each mitigation measure was fulfilled;* • *Document the type of cultural resources recovered and the disposition of such resources;* • *Provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting;*	

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Table 1.12-1
Summary of Impacts and Mitigation

Potential Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation/Remarks
		• *In a confidential appendix, include the daily/weekly monitoring notes from the archaeologist.* • *All reports produced will be submitted to the City, Eastern Information Center and consulting tribes.*	

2.0 INTRODUCTION

2.0 INTRODUCTION

2.1 OVERVIEW

This Recirculated Draft Environmental Impact Report (Recirculated DEIR or RDEIR) evaluates and discloses potential environmental impacts of the Victorville CarMax Auto Superstore Project (the Project). The evaluated Project proposes construction and operation of an auto dealership and supporting auto service uses totaling approximately 8,526 square feet within an approximately 4.76-acre Project site located in the City of Victorville. Elements of the Project are further described at RDEIR Section 3.0, *Project Description*.

This RDEIR is an informational document intended to advise decision-makers and the general public of potentially significant environmental impacts of the Project. The RDEIR also identifies possible ways to preclude or minimize these potentially significant impacts (referred to as mitigation) and describes reasonable alternatives to the Project that may also reduce or avoid significant impacts. Having the authority to take action on the Project, the City of Victorville will consider the information in this RDEIR in their evaluations of the proposal. The RDEIR findings and conclusions regarding environmental impacts do not control the City's discretion to approve, deny, or modify the Project, but instead are presented as information to aid the decision-making process.

2.2 AUTHORIZATION

This RDEIR has been prepared by the City of Victorville in accordance with the *Guidelines for the Implementation of the California Environmental Quality Act (Guidelines)*, (Sections 15000-15387 of the California Code of Regulations), and the City *CEQA Guidelines (Guidelines)*. The Victorville CarMax Auto Superstore Project considered in this RDEIR is a "project," as defined at Section 15378 of the *Guidelines*. The *Guidelines* stipulate that an

EIR must be prepared for any project that may have a significant impact on the environment. Upon its initial environmental review, the City determined that the Victorville CarMax Auto Superstore Project may have a significant adverse impact on the environment and, therefore, the preparation of an EIR was required.

2.3 LEAD AND RESPONSIBLE AGENCIES

CEQA defines a "lead agency" as the public agency which has the principal responsibility for carrying out or approving a Project which may have a significant effect upon the environment. Other agencies, e.g., the California Department of Transportation (Caltrans), the Mojave Desert Air Quality Management District (MDAQMD) or the Regional Water Quality Control Board (RWQCB), having certain authority or responsibility to issue permits for Project implementation, are designated as "responsible agencies." Both the lead agency and responsible agencies must consider the information contained in the RDEIR prior to acting upon or approving the Project. The City of Victorville is the Lead Agency for the proposed Project.

The City's address is:

City of Victorville
14343 Civic Drive
Victorville, California 92393
Contact Person: Travis Clark

2.4 PROJECT APPLICANT

The Project Applicant is:

Centerpoint Integrated Solutions
355 Union Boulevard, Suite 301
Lakewood, CO 80228

2.5 THE EIR PROCESS

When a public agency determines that there is substantial evidence that a project may have a significant effect on the environment, the agency must prepare an EIR before a decision is made to approve or deny the project. The purpose of the EIR is to disclose a project's potential environmental impacts and recommend measures to reduce effects of or avoid potentially significant impacts. The basic content of an EIR includes a description of the project under consideration and its objectives, a description of the existing project site and vicinity environmental conditions, a discussion of the potentially significant environmental effects of the project, recommended measures for reducing these effects, and identification and evaluation of feasible alternatives to the project which may also reduce potentially significant impacts of the proposal.

CEQA requires that the EIR only address significant adverse impacts. The *CEQA Guidelines* suggest thresholds or standards which define the significance of various types of impacts. The *CEQA Guidelines* also state that the significance of impacts should be considered in relation to their severity and probability of occurrence. However, ultimately, the determination of the significance of impacts is at the discretion of the lead agency. The identification of significant impacts in the EIR does not prevent an agency from approving a project. A project may be approved if the lead agency determines that impacts cannot be feasibly mitigated below a level of significance and if the agency determines that there are important overriding considerations, such as social and economic benefits, which are sufficient to justify approval of the considered project.

The original DEIR prepared for the Victorville CarMax Project was circulated for public review and comment for a period of 45 days (March 6 through April 20, 2020). During the review period, public agencies and private parties provided comments on the original DEIR. The City has reviewed those comments and has identified potential issues of environmental concern that could benefit from modification and further discussion within a Recirculated Draft EIR (RDEIR). Additionally, the City recognizes that the recent COVID-19 pandemic has restricted public access to City facilities, as well as information available through the City, including but not limited to information presented in the original DEIR. In response to comments received to date, to facilitate distribution of

information presented in the original DEIR, and encourage public participation in the CEQA process generally, in its role as the Lead Agency, the City has directed the recirculation of the original DEIR in its entirety.

EIR Recirculation Requirements

EIR recirculation requirements are outlined at *CEQA Guidelines* Section 15088.5, excerpted in pertinent part below.

> **15088.5. RECIRCULATION OF AN EIR PRIOR TO CERTIFICATION**
>
> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> > (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
> > (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
> > (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In addition, and as is the case here, a lead agency may choose to recirculate an EIR if additional studies or analysis is conducted for a project before a specific action is taken by local decision makers to approve a project.

Summary of the Recirculated Draft EIR Content and Revisions

The Preface Section is unique to this RDEIR and an additional "draft Mitigation Monitoring Plan" Appendix has been added (RDEIR Appendix F). Numbering and sequencing of the original DEIR, including the original DEIR Appendices and supporting technical studies is otherwise maintained in this RDEIR.

Revisions to the original DEIR presented in this RDEIR are summarized below. These revisions do not affect findings and conclusions of the original DEIR. Substantive revisions to the original DEIR reflected in this RDEIR include:

- Additional discussion and illustration of the disturbed/degraded character of the Project site. See RDEIR Section 3.0, *Project Description*.

- The discussion of Transportation impacts is revised. Consistent with *CEQA Guidelines* Section 15064.3 (b) requirements, the RDEIR Transportation Section is revised to address potential Vehicle Miles Traveled (VMT) impacts of the Project.

  The City recognizes that vehicle delay (Level of Service, LOS) deficiencies are no longer environmental impacts under CEQA.[1] Although not specifically relevant to an analysis of CEQA transportation impacts, City General Plan Policies and City

[1] *CEQA Guidelines* Section 15064.3, effective January 1, 2019, "describes specific considerations for evaluating a project's transportation impacts" and provides that, except for roadway capacity projects, "a project's effect on automobile delay (or LOS) shall not constitute a significant environmental impact." (*CEQA Guidelines*, § 15064.3, subd. (a).)

Traffic Impact Study Guidelines require LOS analysis for new development projects. For this reason, although LOS cannot be used to make a conclusion of a significant environmental effect, analysis of Project-related LOS deficiencies is provided herein for City use and informational purposes. Discussions of "traffic impacts" presented in the Project TIA (RDEIR Appendix B) are amended accordingly by reference.

- Archaeological resources impact mitigation is revised. See Mitigation Measure CR-1. Archaeological resources impact mitigation implementation, timing, and monitoring is outlined in the RDEIR Mitigation Monitoring Plan (MMP), included as RDEIR Appendix F.

- Paleontological resources impact mitigation is revised. See Mitigation Measure GEO-2. Paleontological resources impact mitigation implementation, timing, and monitoring is outlined in the RDEIR Mitigation Monitoring Plan (MMP), included as RDEIR Appendix F.

- The discussion of GHG emissions impacts is revised, clarifying and further substantiating that nominal GHG emissions resulting from the Project would not comprise a significant environmental impact. Project compliance with applicable GHG emissions reduction plans and strategies is further substantiated. See RDEIR Section 4.4, *Greenhouse Gases*.

- The discussion of Project consistency with applicable City and CCCSP sustainability, energy conservation, and energy efficiency policies is revised and expanded. See RDEIR Sections 4.1, *Land Use* and 4.6, *Energy*.

- The discussion of Alternative Sites is revised and expanded. See RDEIR Section 5.2, *Alternatives Analysis*.

- The discussion of City Municipal Separate Storm Sewer System Permit (MS4 Permit) requirements and provisions is revised. See RDEIR Section 1.0, *Executive Summary*.

- The discussion of water supply considerations is revised. See RDEIR Section 1.0, *Executive Summary*.

Recirculated Draft EIR Review Process

Consistent with *CEQA Guidelines* Sections 15087 and 15088.5(d), this RDEIR has been distributed for public review for a period of 45 days. During the 45-day review period, the general public, agencies, and organizations are encouraged to submit written comments on the RDEIR to the City.

Copies of the RDEIR are available for review at Victorville City Hall, Development Department, 14343 Civic Drive, Victorville, California 92393. Please contact the City via email at planning@victorvilleca.gov or telephone (760) 955-5135 for current days/hours of operation. The RDEIR is also posted at the City's website: https://www.victorvilleca.gov/government/city-departments/development/planning/environmental-review-notices.

All written comments on this RDEIR should be addressed to:

City of Victorville, Development Department
14343 Civic Drive
Victorville, California 92393
Contact Person: Travis Clark, Associate Planner
TClark@victorvilleca.gov

At the conclusion of the public review process, a Final RDEIR will be prepared. The Final RDEIR will comprise comments received on the RDEIR and responses to those

comments; the RDEIR including any necessary revisions or corrections; and the original DEIR.

Although a part of the administrative record, previous comments received on the original DEIR do not require a written response in the Final RDEIR. New comments must be submitted for the RDEIR. The City, as provided at *CEQA Guidelines*, Section 15088.5(f)(1), will not respond to comments received on the original DEIR but will respond to new comments received on this RDEIR.

CEQA requires that the EIR only address significant adverse impacts. The *CEQA Guidelines* suggest thresholds or standards which define the significance of various types of impacts. The *CEQA Guidelines* also state that the significance of impacts should be considered in relation to their severity and probability of occurrence. However, ultimately, the determination of the significance of impacts is at the discretion of the lead agency. The identification of significant impacts in the EIR does not prevent an agency from approving a project. A project may be approved if the lead agency determines that impacts cannot be feasibly mitigated below a level of significance and if the agency determines that there are important overriding considerations, such as social and economic benefits, which are sufficient to justify approval of the considered project.

2.6 RDEIR CONTENT AND FORMAT

This RDEIR is organized into seven Chapters or Sections, each dealing with a separate aspect of the required content of an EIR as described in the *Guidelines*. A summary of the project's impacts and recommended mitigation measures is included in Section 1.0. An introduction and general overview of the environmental process and the format of this EIR can be found within Section 2.0. Section 3.0 contains a complete description of the Project, including its location, objectives, and physical and operational characteristics. The complete and detailed impact analysis is presented in Section 4.0. The topical issues mandated by CEQA dealing with cumulative impacts, alternatives, and long-term implications of the Project are found in Section 5.0. Section 6.0 lists and defines the acronyms and abbreviations contained in this document. Section 7.0 lists the information

sources and persons consulted during the environmental analysis process, and presents a list of the persons who prepared the RDEIR.

Section 4.0, *Environmental Impact Analysis*, is the focal component of the RDEIR. The environmental impact analysis has been organized into a series of sections, each addressing an environmental topic or area of concern identified through the Initial Study process (e.g., Land Use and Planning, Traffic and Circulation, Air Quality, Noise, etc.). To assist the reader in understanding the organization and basis of the analysis, the sections covering each individual environmental topic are typically divided into the following subsections:

- **Reader's Abstract:** An introductory reader's abstract, summarizing content and findings, is provided at the beginning of each topical section.

- **Introduction:** The introduction summarizes the content of the section and references other important studies and reports, such as technical studies appended to the RDEIR.

- **Setting:** This subsection describes existing environmental conditions that may be subject to change as a result of implementation of the Project. Regulatory settings are also discussed where applicable. Separate descriptions of existing environmental conditions are provided for each environmental topic.

- **Standards of Significance:** Before potential impacts are evaluated, the standards which will serve as the basis for judging significance are presented.

- **Potential Impacts and Mitigation Measures:** This subsection discusses and substantiates potential Project environmental impacts. Based on the standards of significance, impacts are categorized as either potentially significant or less-than-significant. If the impacts are considered to be potentially significant, mitigation measures are proposed to reduce the impacts. At the conclusion of each discussion for a potentially significant impact, a determination is made as to whether the impact can be reduced to a less-than-significant level with the application of

feasible mitigation measures. Potentially significant impacts that cannot be mitigated to levels that would be less-than-significant are identified as significant and unavoidable.

The summary presented in Section 1.0 provides a comprehensive overview of the Project's environmental impacts. For a more detailed description of Project impacts, it is recommended that the reader review the Project Description (Section 3.0), and then read the sections on the topics of interest presented in the environmental impact analysis (Section 4.0).

2.7 INTENDED USE OF THIS RDEIR

This RDEIR addresses the potential environmental effects of the implementation and operation of the proposed Victorville CarMax Auto Superstore Project (the Project). The City of Victorville (City) is the lead agency for the purposes of CEQA because it has the principal responsibility and authority for deciding whether or not to approve the Project, and how it will be implemented. As the Lead Agency, the City is also responsible for preparing the environmental documentation for the Project in compliance with CEQA.

The lead agency will employ this RDEIR in its evaluation of potential environmental impacts resulting from, or associated with, approval and implementation of the Project, to include potential effects of the Project's component elements. It is anticipated that this RDEIR may also be employed by responsible agencies, e.g., the Air Quality Management District(s), Regional Water Quality Control Board(s), *et al*., for their related or dependent environmental analyses.

2.8 DOCUMENTS INCORPORATED BY REFERENCE

Section 15150 of the State *CEQA Guidelines* permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized within this RDEIR, where that information is relevant to the analysis of potential Project impacts. All documents incorporated by reference are available for review at, or can be obtained through, the City of Victorville Planning Department.

Technical studies cited below were specifically developed in conjunction with the Project, and are included in their entirety in the CD-ROM attached to the RDEIR's back cover.

2.8.1 Victorville General Plan

The City of Victorville General Plan (General Plan) establishes Goals and Policies and provides guidance for future development of the City. The General Plan provides the guidance necessary for successful implementation of General Plan Policies.

The Victorville General Plan was developed consistent with State of California General Plan Guidelines and contains the following state-mandated elements: Land Use, Circulation, Housing, Resource, Noise, and Safety. All proposed development projects within the City are evaluated for consistency with the intent and purpose of the applicable General Plan land use designation(s) and related General Plan Policies.

2.8.2 Civic Center Community Sustainability Specific Plan

The Project site is located within the Civic Center Community Sustainability Specific Plan (Specific Plan). The Specific Plan, adopted in 2016, encompasses 473 acres located in the central portion of the City of Victorville. The Specific Plan contains four district types: Commercial, Business, Government/Service, and Mixed-Use.

The Commercial District includes three land use designations: Community Commercial (CC-1), Civic Commercial (CC-2), and Auto Park (AP). The Project site is located within the CC-2 designation.

The site's existing CC-2 designation does not permit used vehicle sales. As adopted, the Specific Plan only allows used vehicle sales as a conditionally permitted use within the CC-1 designation. New vehicle sales are only permitted within the AP designation. The CC-2 land use designation does not permit vehicle sales as a permitted or conditionally permitted use.

To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally allow used vehicle sales within the CC-2 designation. The Project site is located immediately adjacent to AP designated properties, and represents a logical continuation of vehicle sales type uses. Design and development of the Project would be regulated by the Specific Plan as amended under the Project.

2.8.3 Project Technical Studies/RDEIR Appendices

Following are summary descriptions of documents and supporting technical studies which are appended to the main body of the Draft EIR. Working titles of these documents generically refer to the Project and its physical attributes, and may not necessarily reflect the currently assigned "Victorville CarMax Auto Superstore Project" development title.

2.8.3.1 NOP and NOP Responses - RDEIR Appendix A

The original DEIR Notice of Preparation (NOP) and NOP responses are presented at RDEIR Appendix A. The RDEIR NOA and NOC are also presented at RDEIR Appendix A. Based on consultation with the City of Victorville and the responses to the NOP, the original DEIR and this RDEIR evaluate the topics of: Land Use and Planning; Transportation; Air Quality; Greenhouse Gas Emissions; Noise; and Energy.

2.8.3.2 Traffic Impact Analysis - RDEIR Appendix B

The detailed evaluation of Project-related traffic/transportation impacts is documented in *Traffic Impact Analysis, CarMax, Victorville, California* (Michael Baker International) June 3, 2019 (TIA). The traffic issues related to the Project have been evaluated within the TIA in the context of the California Environmental Quality Act and as directed by the City of Victorville.

2.8.3.3 Air Quality Impact Analysis - RDEIR Appendix C

Potential air quality impacts of the Project, including potential short-term construction-source emissions impacts and potential long-term operational-source emissions impacts are assessed within the *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.

2.8.3.4 Greenhouse Gas Analysis - RDEIR Appendix D

Detailed analysis of the Project's potential Greenhouse Gas Emissions impacts are presented in *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.

2.8.3.5 Noise Impact Analysis - RDEIR Appendix E

Potential noise impacts of the Project, including potential short-term construction-source noise impacts and potential long-term operational-source noise impacts are assessed within *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

2.8.3.6 Draft Mitigation Monitoring Plan - RDEIR Appendix F

The Draft Mitigation Monitoring Plan (MMP) presents mitigation implementation, timing, and monitoring.

3.0 PROJECT DESCRIPTION

3.0 PROJECT DESCRIPTION

3.1 OVERVIEW

The proposed Victorville CarMax Auto Superstore Project (Project), including all proposed facilities, supporting improvements, and associated discretionary actions comprise the Project considered in this Recirculated Draft Environmental Impact Report (Recirculated Draft EIR, RDEIR). In summary, the Project proposes construction of an auto dealership and supporting auto service uses totaling approximately 8,526 square feet within an approximately 4.76-acre Project site.

3.2 PROJECT LOCATION

The Project site is located in the City of Victorville in San Bernardino County. As illustrated at Figure 3.2-1, the Project site is located along the east side of Civic Drive, south of the intersection of Roy Rogers Drive and Civic Drive. The street address of the Project site is 14901 Civic Drive.

3.3 EXISTING LAND USES

The Project site is a vacant graded property. Properties to the north are currently vacant, beyond which are fast food restaurants. Immediately west of the Project site is a vacant graded pad. Farther west, across Civic Drive, are commercial uses. Southerly adjacent to the Project site are auto dealership uses. The easterly boundary of the Project site is defined by the Roy Rogers Drive/Interstate 15 on-ramp and Interstate 15. Existing land uses in proximity to the Project site are identified at Figure 3.2-1, *Project Vicinity and Existing Land Uses*. Site photographs are presented at Figure 3.2-2. The Project site and surrounding properties are urbanized and are heavily disturbed by current and historic human activities.

N

NOT TO SCALE

Source: Google Earth; Applied Planning, Inc.

applied planning inc

Figure 3.2-1
Project Vicinity and Existing Land Uses

Northeast corner of the Project site, facing south.

Eastern perimeter of the Project site, facing west.

Center of the Project site, facing east.

Source: Rincon Consultants, Inc.

appliedplanning inc

Figure 3.2-2
Site Photographs

3.4 GENERAL PLAN LAND USE and ZONING DESIGNATIONS

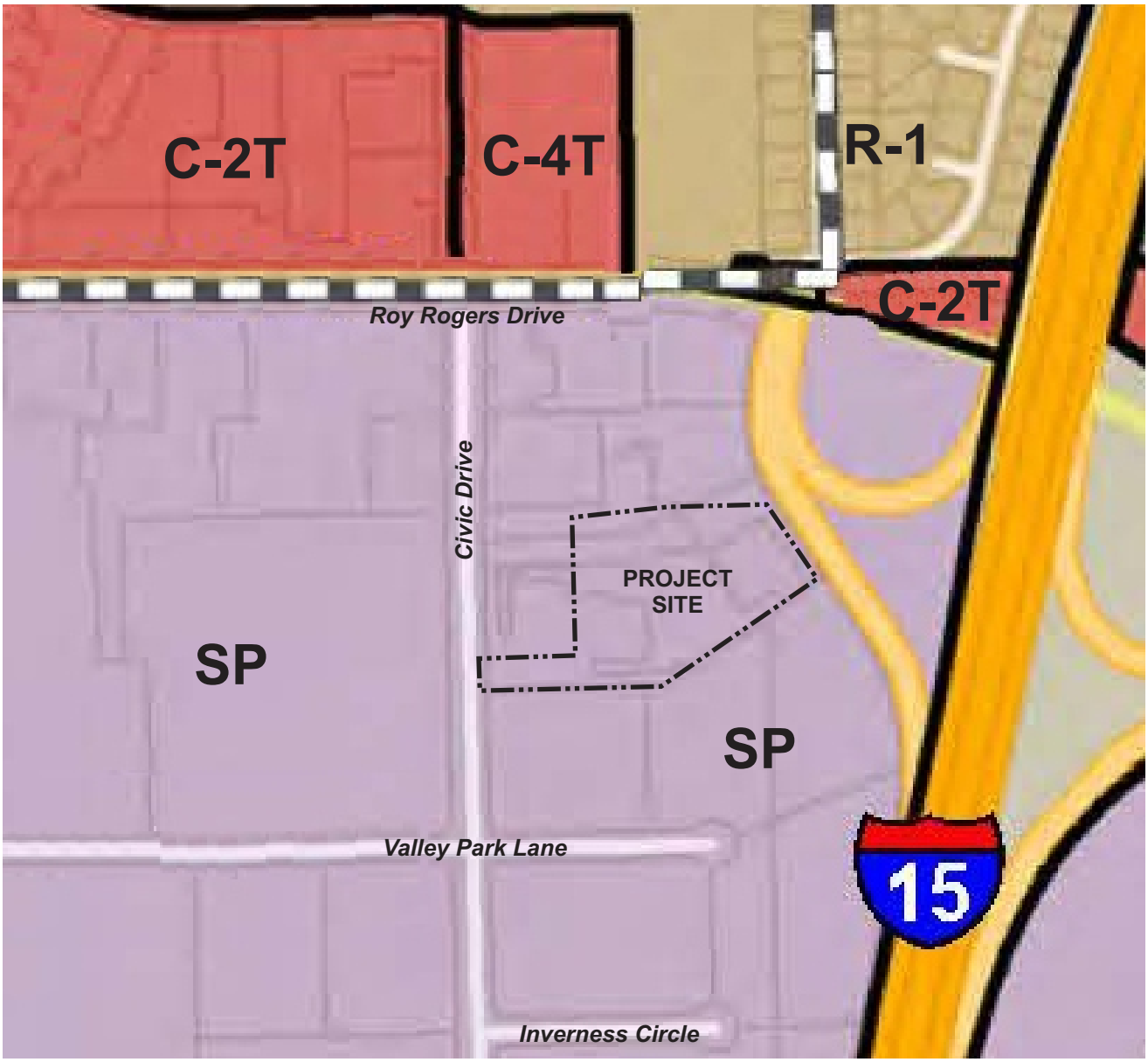
The existing Project site General Plan Land Use designation is Commercial. The Zoning designation for the Project site is Specific Plan. The site is located within the Civic Center Community Specific Plan (Specific Plan). Existing Project site General Plan Land Use and Zoning designations are presented at Figure 3.4-1.

The Specific Plan, adopted in 2016, encompasses 473 acres located in the central portion of the City of Victorville. The Specific Plan contains four district types: Commercial, Business, Government/Service, and Mixed-Use.

The Commercial District includes three land use designations: Community Commercial (CC-1), Civic Commercial (CC-2), and Auto Park (AP). The Project site is located within the CC-2 designation.

The site's existing CC-2 designation does not permit used vehicle sales. As adopted, the Specific Plan only allows used vehicle sales as a conditionally permitted use within the CC-1 designation. New vehicle sales are only permitted within the AP designation. The CC-2 land use designation does not permit vehicle sales as a permitted or conditionally permitted use.

To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally allow used vehicle sales within the CC-2 designation. The Project site is located immediately adjacent to AP designated properties, and represents a logical continuation of vehicle sales type uses. Design and development of the Project would be regulated by the Specific Plan as amended under the Project.



GENERAL PLAN LEGEND

- Low Density Residential (5 du/ac)
- Commercial
- Specific Plan

ZONING LEGEND

Residential:
R-1 Single Family
Commercial:
C-2 / C-4 General Commercial
Other:
SP Specific Plan
*T Transitional

N
NOT TO SCALE

Source: City of Victorville; Applied Planning, Inc.

applied planning inc

Figure 3.4-1
General Plan and Zoning Designations

3.5 PROJECT ELEMENTS

3.5.1 Development Concept

Table 3.5-1 summarizes the land uses and the maximum potential Project development scope evaluated in this RDEIR. Future variations or revisions to the Project described herein, or any other substantive change to the Project evaluated in this RDEIR would, at the discretion of the Lead Agency, be subject to subsequent environmental analysis.

Table 3.5-1
Project Development Summary

Main Dealership Sales and Service/Repair Buildings	Size
• Sales	4,312 SF
• Presentation	635 SF
• Retail Service	2,643 SF
• Carwash	936 SF
TOTAL	**8,526 SF**

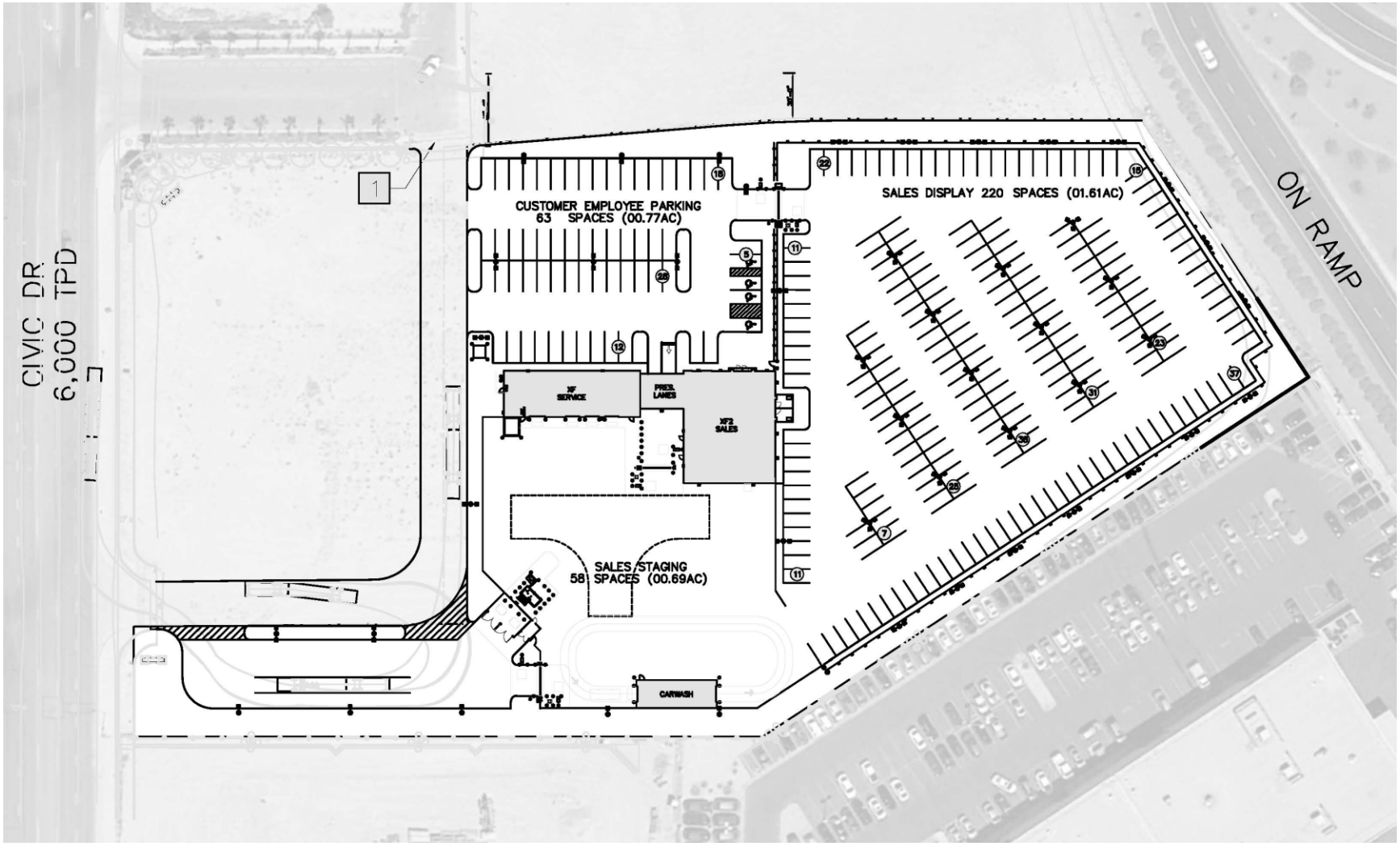
3.5.2 Project Facilities

The Project building areas would comprise approximately 8,526 square feet and would accommodate sales, presentation and retail areas, supporting auto service/repair facilities and a dealership service carwash. The main dealership sales and service/repair building would be centrally located within the Project site.

Vehicle inventory areas would be located along the Project site's easterly I-15 frontage. Customer and employee parking areas would be located in the northwesterly portions of the Project site.

A private above-ground storage tank (AST) for fuel and associated fuel dispensing would be located within the vehicle sales staging area, in the south-central portion of the site. ASTs for oil and antifreeze would also be located adjacent to the service portion of the sales/service building. ASTs implemented by the Project would be double-walled and include an advanced monitoring system for leak detection. ASTs would be serviced and maintained by professional third-parties.

Please refer also to Figure 3.5-1, *Site Plan Concept*, and Figure 3.5-2, *Building Floor Plan*.



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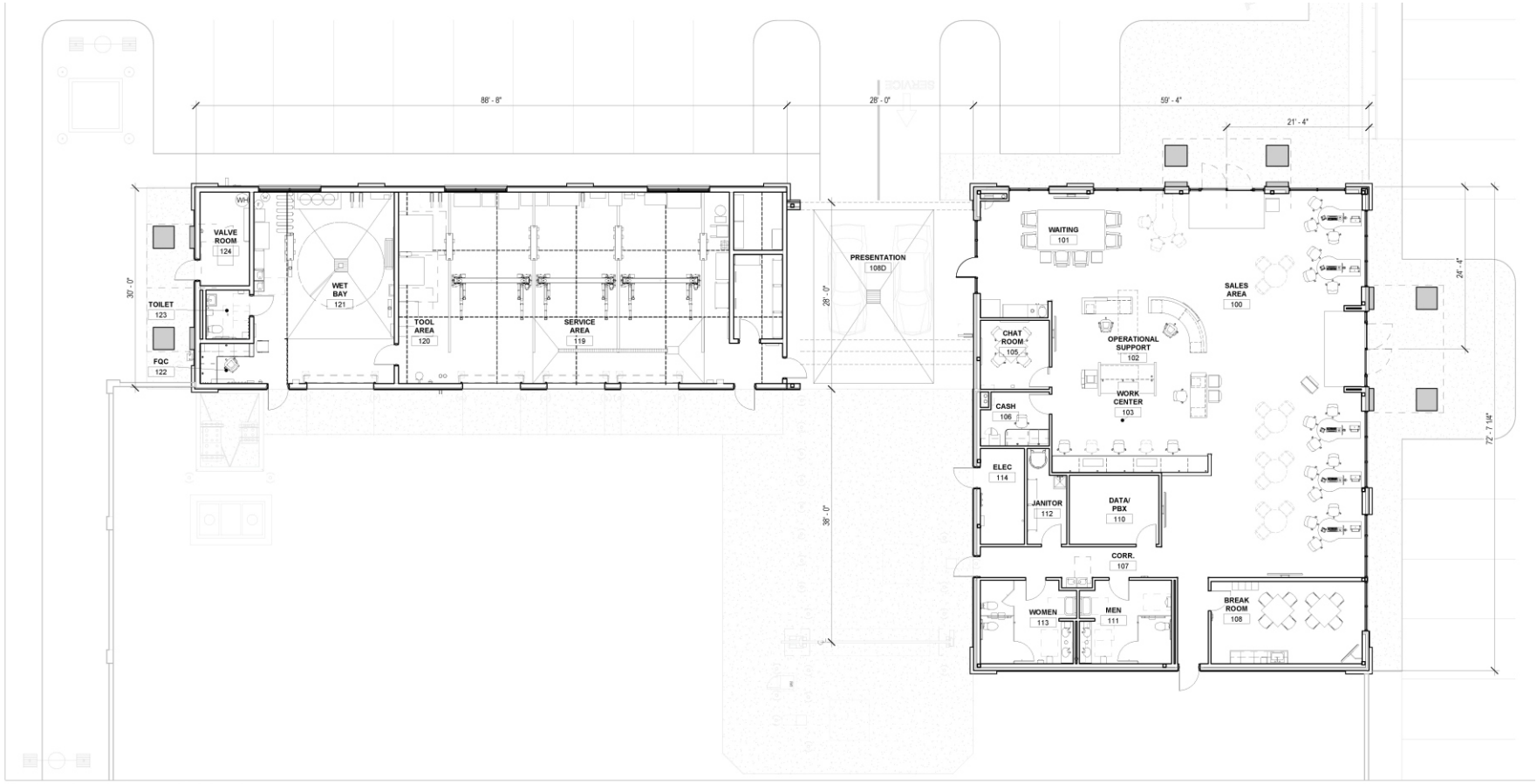
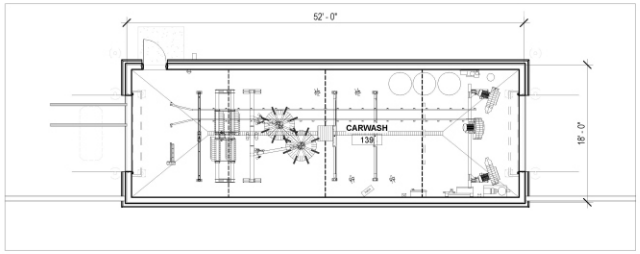
NOT TO SCALE

Source: CarMax

Figure 3.5-1
Conceptual Site Plan



1 A 2.0 SALES & SERVICE FLOOR PLAN
1/8" = 1'-0"



2 A 2.0 CARWASH FLOOR PLAN
1/8" = 1'-0"

Source: Charles J. O'Brien Architect (7/9/20)

appliedplanning inc

Figure 3.5-2
Building Floor Plan

3.5.3 Project Operations

3.5.3.1 Hours of Operation

CarMax management would establish the actual Project store operating hours. Showroom sales areas of similar stores are typically open to the public Monday through Saturday from 9:00 AM to 9:00 PM with limited hours on Sundays, subject to market factors and local law. Store retail service areas are typically open to the public Monday through Friday from 7:30 AM to 6:00 PM. Associates would be present at the store before and after the public operating hours. Within this analysis, Project operations are assumed to be limited to between the hours of 7:00 AM and 10:00 PM.

3.5.3.2 Vehicle Deliveries

Vehicle carriers would enter the Project site via the proposed southern Project driveway access to Civic Drive. Vehicles would be loaded and unloaded within a designated on-site area located in the southwesterly portion of the customer/employee parking lot. Unloaded vehicles would be driven from the parking lot into the adjacent staging area to await vehicle preparation.

3.5.3.3 Sales & Marketing

CarMax dealerships physically separate inventory areas from customer and employee parking areas. This design is intended to reduce loss and improve operational efficiency and safety. All inventory display areas would be separated from the general public by means of guardrails, gates, and fencing. Ornamental wrought-iron fencing or other means acceptable to the City would be used to separate customer and employee parking areas from vehicle display areas.

Vehicular access to display areas would be controlled by security gates. Prospective customers are most commonly accompanied by an employee while inspecting vehicles for sale within the display area. Only employees would be permitted to drive cars within the display area. Emergency access would be provided to, and within, staging and display areas as required by the Victorville Fire Department.

3.5.3.4 Service Operations

CarMax currently offers retail routine vehicle maintenance services, as well as vehicle repairs covered under service plans. All service work would be performed inside fully air-conditioned buildings equipped with rollup doors, eliminating the need to conduct operations with open bay doors.

Retail service vehicles and vehicles awaiting disposition off-site would be stored in a secured non-public staging area on a temporary basis. The staging area would be secured and screened by a masonry wall, or other screening/security features considered appropriate by the City. Vehicular access to the staging area would be controlled by security gates through the use of a secured key-card.

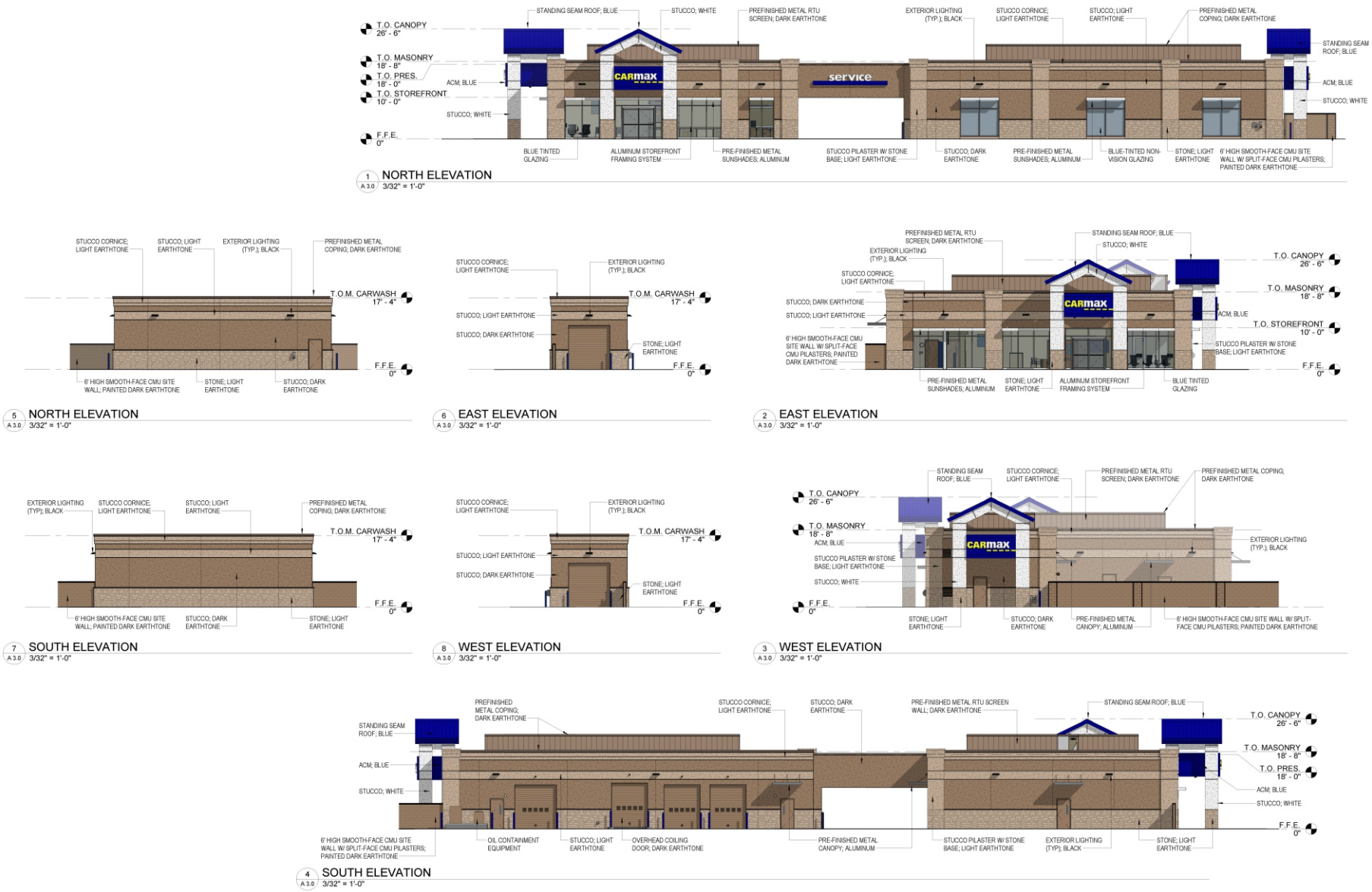
A proposed dealership carwash would be located southerly of the main dealership/service building. This carwash would be available for washing of CarMax vehicle inventory but would not be accessible to the general public.

3.5.4 Project Opening Year

For analytic purposes, the assumed Project Opening Year is 2021. Under Opening Year Conditions, all Project facilities are assumed to be occupied and fully operational.

3.5.5 CarMax Superstore Architectural Concepts

Project Architectural Concepts are presented at Figure 3.5-3. CarMax Superstore architectural concepts design elements evidence split-face block with accents of smooth earth-toned painted surfaces, and clear anodized aluminum storefront framing with blue-tinted glazing. All customer entries are pronounced with a covered tower feature constructed of white Exterior Insulation and Finish Systems (EIFS) columns and a blue standing seam gable roof. The towers feature an Aluminum Composite Material (ACM) band with the CarMax logo mounted above the entry doors. Roof-mounted equipment would be screened by a pre-finished earth-tone metal Rooftop Unit (RTU) screening and parapet walls.



Source: Charles J. O'Brien Architect (7/9/20)

Figure 3.5-3
Architectural Concepts

3.5.6 Vehicular Access and Circulation

Vehicular access to the Project site would be provided by two STOP-controlled driveways along Civic Drive; one existing and one proposed. The Project does not otherwise require access alteration(s) or any substantive site-adjacent roadway improvements.

3.5.7 Parking

The current Project concept provides separate customer/employee (67, plus 4 handicap), staging (73), and sales display (221) parking areas. In total, 365 spaces would be provided. Within the sales display area only, and consistent with CarMax standard designs, 9′ x 17′ spaces and 20′ drive aisles are proposed. Only employees would be permitted to drive cars within the display area. All other parking facilities, including parking stalls and drive aisles configurations, would be designed and constructed pursuant to applicable provisions of the Specific Plan and City requirements.

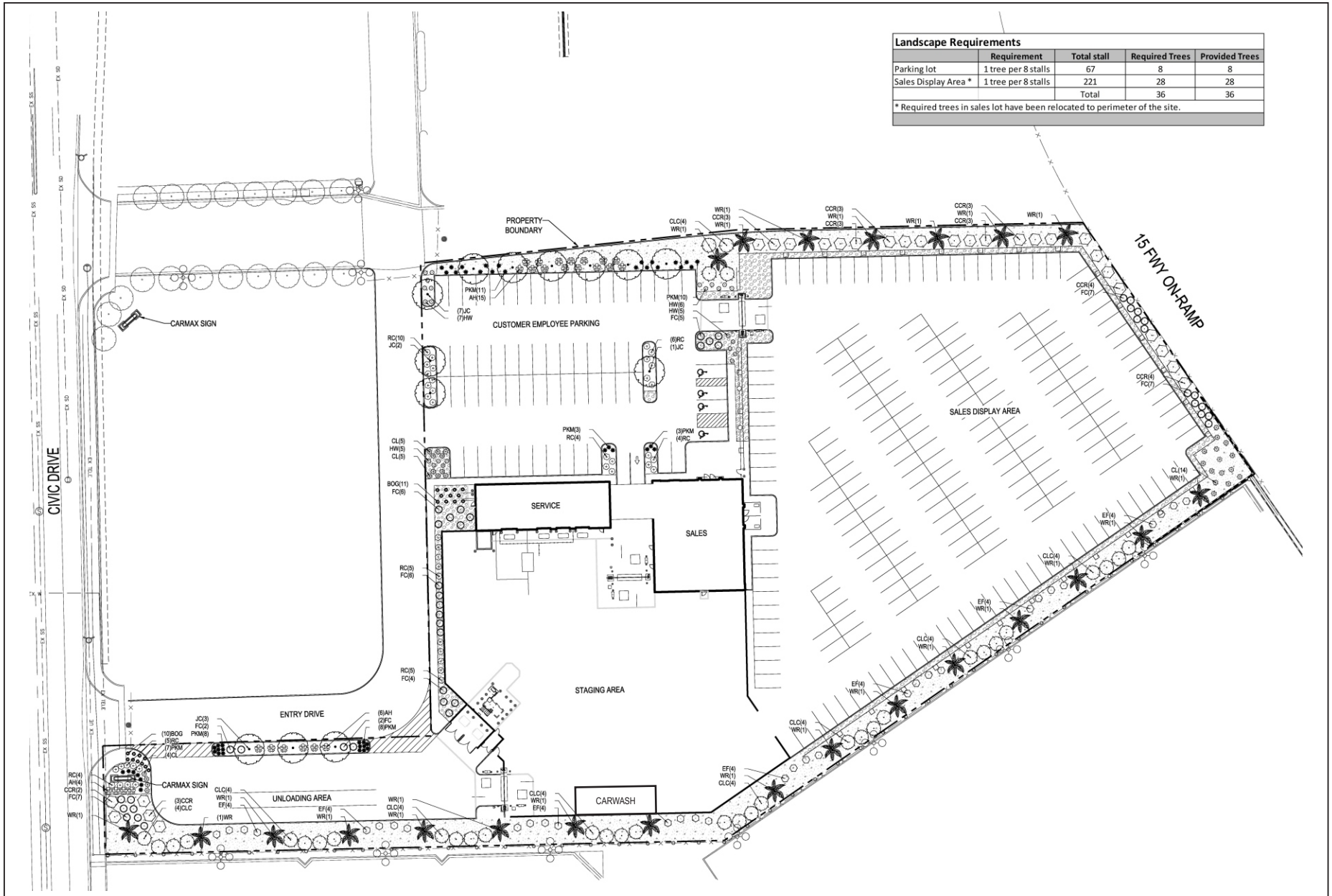
3.5.8 Landscape/Hardscape/Streetscape

Perimeter and internal landscape/hardscape features would be provided consistent with applicable provisions of the Specific Plan or as otherwise required by the City. The implemented landscape/hardscape concept would enhance the appearance of parking areas, provide shade and visual interest, define entry/access points, accentuate site and architectural features, and provide screening. The Project Landscape Concept is presented at Figure 3.5-4.

3.5.9 Other Design/Operational Elements

3.5.9.1 Lighting

CarMax employs full cutoff LED lighting fixtures, typically mounted on 26-foot tall light standards. LED fixtures would be directed and shielded to preclude substantive light overspill onto adjacent properties. Exterior lighting intensities would be reduced after dealership operating hours. Lighting in total would conform to applicable provisions of the Specific Plan and City of Victorville Zoning Ordinance, subject to review and approval by the City.



Source: PCS Group, Inc. (5/23/19)

applied planning inc

Figure 3.5-4
Landscape Concept

3.5.9.2 Signs

CarMax does not use flags, balloons, inflatables (animals or other), placards in open car hoods, painted window lettering or the like in its marketing. Project signage would conform to current provisions of Section 6.13, *Signage*, of the Specific Plan, subject to review and approval by the City.

3.5.9.3 Security

CarMax employs interior and exterior security cameras for asset protection.

3.5.9.4 Employee Communications

CarMax does not require or use outdoor loudspeakers to page associates. Instead, employees use cell phones to communicate with each other. Speakers would only be employed in an effort to address after-hours trespassers, should the need arise.

3.5.10 Infrastructure/Utilities

Infrastructure and utilities that would serve the Project site are summarized below.

3.5.10.1 Water/Sewer Services

Water service to the Project would be provided by Victorville Water District (VWD) via connections to existing water facilities located within adjacent roadways. City water and sanitary sewer lines exist within Civic Drive. All Project service lines would be designed, constructed, and maintained consistent with City and VWD requirements.

Wastewater generated by the Project would be conveyed for treatment by facilities operated by the Victor Valley Wastewater Reclamation Authority (VVWRA) which owns and operates regional wastewater reclamation facilities serving Apple Valley, Hesperia, Victorville, Spring Valley Lake and Oro Grande.

3.5.10.2 Storm Water Management

Construction Storm Water Management

During Project construction, a Storm Water Pollution Prevention Plan (SWPPP) would be implemented, consistent with the requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit and water quality requirements and storm water management programs specified by the Lahontan Regional Water Quality Control Board (LRWQCB).

Post-Construction Storm Water Management

The Project storm water management system comprehensively includes proposed drainage improvements, and facilities and programs which act to control and treat storm water pollutants. Parking areas within the site would be designed to capture and direct flows to catch basins placed throughout the Project site. Storm flows will confluence while traveling towards the west side of the property, and ultimately join at a proposed diversion structure.

Low flows entering the diversion structure would be directed to a proposed Continuous Deflective Separation (CDS)[1] unit located downstream of the diversion structure to filter and treat the first flush storm water. This treated storm water will then be stored in proposed underground chambers leading towards a proposed Drywell. High flows will bypass the diversion structure and travel towards the existing 54-inch storm drain main located along Civic Drive. All flows entering the underground chambers will be sized to satisfy the Water Quality Management Plan (WQMP) requirements for Design Capture Volume or the difference in volume between Pre- and Post- Development condition, whichever is greater. The WQMP requires a minimum design capture volume of 10,418.60 cubic feet. The Project would provide an underground storage chamber to satisfy the WQMP conditions by providing a minimum storage capacity of 10,500 cubic

[1] CDS is a swirl concentrator hybrid technology that uses continuous deflective separation – a combination of swirl concentration and indirect screening to screen, separate and trap debris, sediment, and hydrocarbons from storm water runoff. The indirect screening capability of the system allows for 100% removal of floatables and neutrally buoyant material debris 2.4mm or larger, without binding. CDS retains all captured pollutants, even at high flow rates, and provides easy access for maintenance.

feet of volume. This proposed underground storage will lead into a proposed Drywell on-site. Therefore, storm water runoff from the Project site would not increase under post-development conditions.

3.5.10.3 Solid Waste Management

It is anticipated that Project-generated solid waste would be collected and conveyed by existing service providers to the Victorville Landfill, which is located northerly of the City, at 18600 Stoddard Wells Road. Additionally, a Materials Recycling Facility (MRF) is located within the City. The MRF provides processing of residential and mixed commercial recyclables generated within the City of Victorville and the Town of Apple Valley.

3.5.10.4 Electricity

Electrical service to the Project would be provided by Southern California Edison (SCE). New lines installed pursuant to the Project would be placed underground. Alignment of service lines and connection to existing services would be as required by SCE. Surface-mounted equipment, such as transformers, meters, and service cabinets would conform to building setback requirements outlined in the Specific Plan, or as otherwise required by the City and SCE.

To allow for, and facilitate, Project construction activities, provision of temporary SCE electrical services improvements would be required. The scope of such temporary improvements is considered to be consistent with and reflected within the total scope of development proposed by the Project.

3.5.10.5 Natural Gas

Natural gas service would be provided by the Southwest Gas Corporation. Existing service lines would be extended to the Project uses. Alignment of service lines and connection to existing services would be as required by the Southwest Gas Corporation.

3.5.10.6 Communications Services

Communications services, including wired and wireless telephone and internet services are available through numerous private providers and would be provided on an as-needed basis. As with electrical service lines, all existing and proposed wires, conductors, conduits, raceways, and similar communications improvements within the Project area would be installed underground. Any necessary surface-mounted equipment, e.g., terminal boxes, transformers, meters, service cabinets, etc., would be screened and would conform to building setback requirements outlined in the Specific Plan, or as otherwise required by the City.

3.5.11 Fire Protection and Police Protection Services

Police and fire protection services are currently available to the Project site and are described below.

- Fire Protection Services: Fire protection and emergency response services for the Project and the City of Victorville are provided by the Victorville Fire Department. The City also participates in the Regional Fire Protection Authority (RFPA), which ensures provision of fire protection and emergency services under mutual aid agreements with San Bernardino County.

- Police Protection Services: Police protection for the Project site and vicinity properties is currently provided by the Victorville Police Department, as a contract service of the San Bernardino County Sheriff Department.

3.5.12 Schools, Parks and Other Public Services

The City also provides or facilitates provision of a range of other services that would be generally available to the Project patrons and employees. These services include, but are not limited to: educational services, library services, arts and entertainment, and human services. These services and associated facilities are generally programmed and implemented in response to residential development and demands of resident populations. The Project commercial uses would not substantively affect the City's

resident population. As such, facilities proposed by the Project would not affect schools, parks, or other public services or their availability.

3.5.13 Energy Efficiency/Sustainability

Energy-saving and sustainable design features and operational programs would be incorporated in the Project facilities pursuant to California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City of Victorville. Consistent with City requirements as outlined at General Plan Policy 7.2.1, the final Project designs and building plans as reviewed and approved by the City would be 15 percent more efficient than 2008 Title 24 Standards.

In support of General Plan Policy 7.1.1, and onsite energy production policies outlined in the Civic Center Community Specific Plan (CCCSP, Specific Plan), the Project would implement a solar water heating system (approximately 120 gallon system); and solar-powered lighted bollards leading from the customer/employee lot to the front door of the sales building.

In conformance with the City of Victorville Climate Action Plan (CAP), the Project would implement CAP Screening Table Measures yielding a minimum of 45 points. Projects that yield at least 45 points are determined to be consistent with the CAP. A representative example of how the Project could achieve a minimum of 45 Screening Table Points through implementation of the CAP Screening Table Measures is provided at Table 3.5-2.

Table 3.5-2
Project GHG Emissions Screening Table Measures

Measure	Description	Assigned Point Values	Project Points
Building Envelope			
Insulation	2008 baseline (walls R-13; roof/attic R-30)	0 points	15
	Modestly Enhanced Insulation (walls R-13, roof/attic R-38)	15 points	
	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	18 points	
	Greatly Enhanced Insulation (spray foam insulated walls R-15 or higher, roof/attic R-38 or higher)	20 points	

Table 3.5-2
Project GHG Emissions Screening Table Measures

Measure	Description	Assigned Point Values	Project Points
Windows	2008 Baseline Windows (0.57 U-factor, 0.4 solar heat gain coefficient [SHGC])	0 points	7
	Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC)	7 points	
	Enhanced Window Insulation (0.32 U-factor, 0.25 SHGC)	8 points	
	Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less SHGC)	12 points	
Indoor Space Efficiencies			
Water Heaters	2008 Minimum Efficiency (0.57 Energy Factor)	0 points	14
	Improved Efficiency Water Heater (0.675 Energy Factor)	14 points	
	High Efficiency Water Heater (0.72 Energy Factor)	16 points	
Reduction Measure PS T3: Electric Vehicle Infrastructure			
Electric Vehicles	Provide public charging station for use by an electric vehicle (ten points for each charging station within the facility).	10 points	10
TOTAL POINTS			**46**

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018, Appendix 3.2: *Screening Tables*.

The City, through established design review and development permit processes, would ensure that the Project final designs achieve Screening Table points identified at Table 3.5-2. It is noted here that the CAP Screening Table points identified above are minimums that would be achieved by the Project. Final designs as approved by the City may yield additional Screening Table points and further GHG emissions reductions. Mitigation Measure 4.4.1 is incorporated in the RDEIR to facilitate implementation and monitoring of the Project Screening Table Measures.

3.5.14 Construction Traffic Management Plan

Temporary and short-term traffic detours and traffic disruptions could result during Project construction activities including implementation of access and circulation improvements noted above. Accordingly, the Project Applicant would be responsible for the preparation and submittal of a construction area traffic management plan (Plan) to be reviewed and approved by the City. Typical elements and information incorporated in the Plan would include, but would not be limited to:

- **Name of on-site construction superintendent and contact phone number.**

- **Identification of Construction Contract Responsibilities** - For example, for excavation and grading activities, describe the approximate depth of excavation, and quantity of soil import/export (if any).

- **Identification and Description of Truck Routes** - to include the number of trucks and their staging location(s) (if any).

- **Identification and Description of Material Storage Locations (if any).**

- **Location and Description of Construction Trailer (if any).**

- **Identification and Description of Traffic Controls** - Traffic controls shall be provided per the Manual of Uniform Traffic Control Devices (MUTCD) if the occupation or closure of any traffic lanes, parking lanes, parkways or any other public right-of way is required. If the right-of-way occupation requires configurations or controls not identified in the MUTCD, a separate traffic control plan must be submitted to the City for review and approval. All right-of-way encroachments would require permitting through the City.

- **Identification and Description of Parking** - Estimate the number of workers and identify parking areas for their vehicles.

- **Identification and Description of Maintenance Measures** - Identify and describe measures taken to ensure that the work site and public right-of-way would be maintained (including dust control).

The Plan would be reviewed and approved by the City prior to the issuance of the building permit. The Plan and its requirements would also be provided to all contractors as one required component of building plan/contract document packages.

3.6 PROJECT OBJECTIVES

The primary goal of the Project is the redevelopment of the subject site with a car dealership use that responds to local and regional car sales market demands. Supporting objectives of the Project include the following:

- Transition and repurpose the subject site to a useful productive commercial auto dealership and services facility. Benefits would include new sales tax revenues and increased property tax revenues available to the City of Victorville.

- Preserve and enhance visual attributes of the Project site.

- Provide car dealership sales and service facilities that are responsive to community needs and that are compatible with proximate land uses.

- Take advantage of access and visual recognition provided by the Project site's adjacency to the I-15 freeway.

- Implement employment-generating land uses that would create new jobs available to City residents.

- Take advantage of available infrastructure.

3.7 DISCRETIONARY APPROVALS AND PERMITS

Discretionary actions, permits, and related consultation(s) necessary to approve and implement the Project include, but are not limited to, the following.

3.7.1 Lead Agency Discretionary Actions and Permits

- **CEQA Compliance.** The City must certify the Recirculated Environmental Impact Report prior to, or concurrent with, any approval of the Project.

- **Specific Plan Amendment.** To implement the Project uses, the Applicant has requested approval of an amendment to the Civic Center Community Sustainability Plan to conditionally allow the proposed uses.

- **Site Plan Review and Approval.** The Project uses, and their proposed configurations are subject to review and approval by the City.

- **Parcel Map Approval.**

- **Conditional Use Permit.** The Project would require a Conditional Use Permit to allow a used vehicle sales operation within the CC-2 zone of the Specific Plan.

- **Architectural Review and Approval.** Architectural designs of the Project facilities are subject to review and approval by the City.

- **Other City Permits.** Various other City of Victorville permits (such as construction, grading, and encroachment) are required to allow implementation of the Project facilities.

3.7.2 Other Agency Consultation and Permits

Anticipated consultation(s) and permits from agencies other than the City that would be necessary to realize the proposal would likely include, but would not be limited to, the following:

- Consultation with requesting Tribes as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*; and *SB 18, Burton. Traditional tribal cultural places*.

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;

- Permitting may be required by/through the Mojave Desert Air Quality Management District (MDAQMD) for certain equipment or land uses that may be implemented within the Project area; and

- Other ministerial permits necessary to realize all on- and off-site improvements related to the development of the site.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.0 ENVIRONMENTAL IMPACT ANALYSIS

This chapter of the RDEIR analyzes and describes the potential environmental impacts associated with the adoption and implementation of the Victorville CarMax Auto Superstore Project (Project). The environmental impact analysis has been organized into a series of sections, each addressing a separate environmental topic. Environmental topics addressed in this RDEIR are presented in the following sections:

Section	Topic
4.1	Land Use and Planning
4.2	Transportation
4.3	Air Quality
4.4	Greenhouse Gas Emissions
4.5	Noise
4.6	Energy

Within each of the above topical Sections, the discussion is typically divided into subsections which: describe the "setting" or existing environmental conditions; identify regulations and policies, which through their observance typically resolve many potential environmental concerns; identify thresholds of significance applicable to potential environmental effects of the Project; describe the significance of Project-related environmental effects in the context of applicable significance thresholds; and for impacts which are potentially significant or significant, recommend mitigation measures to eliminate or reduce their effects. In this latter regard, it is recognized that the intent of the California Environmental Quality Act (CEQA) is to focus on significant, or potentially significant adverse effects of the Project, and therefore, mitigation is proposed only for potential impacts of this magnitude.

As noted above, before potential impacts are evaluated, the standards or thresholds which will serve as the basis for judging the relative significance of impacts are presented. Often thresholds serve as a general guide or gauge for determining an impact's potential relative significance, rather than defining its absolute effects. Subsequent to identification of relevant significance thresholds, potential Project-related effects and impacts are identified and explained. If an impact is considered to be potentially significant, mitigation measures are proposed to avoid the impact, or reduce its effects to the extent feasible. In determining the potential significance of impacts, the adequacy of existing policies and regulations in addressing each impact is taken into consideration. At the conclusion of each discussion for a potentially significant impact, a determination is made as to whether the impact can be reduced to a less-than-significant level with the application of mitigation measures.

In the environmental analysis, the following terms are used to describe the potential effects of the Project:

- **Less-Than-Significant Impacts**: Minor changes or effects on the environment caused by the Project which do not meet or exceed the criteria, standards, or thresholds established to gauge significance are considered to be less-than-significant impacts. Less-than-significant impacts do not require mitigation. In some cases, these impacts may appear to be potentially significant. However, existing public policies, regulations, and procedures adequately address these potential effects, thereby reducing them to a less-than-significant level, without the need for additional mitigation.

- **Potentially Significant Impacts**: Potentially significant impacts are defined as a substantial, or potentially substantial, adverse change in the environment. The *CEQA Guidelines* and various responsible agencies provide guidance for determining the significance of impacts. However, the determination of impact significance is ultimately based on the judgment of the lead agency. Similarly, the establishment of any criteria to be used in evaluating the significance of impacts is

the responsibility of the lead agency. Wherever possible, mitigation is proposed in the RDEIR to avoid or reduce the magnitude of potentially significant impacts.

- **Significant Impacts**: Impacts identified in the RDEIR which cannot be mitigated below thresholds of significance through the application of feasible mitigation measures are categorized as "significant."

- **Cumulative Impacts**: A discussion of cumulative impacts is provided in Section 5.0 of this environmental analysis. Cumulative impacts refer to the impacts of the Project as they are combined or interact with anticipated impacts of other vicinity projects and physical effects of projected ambient regional growth.

4.1 LAND USE AND PLANNING

4.1 LAND USE AND PLANNING

Abstract

This Section identifies and addresses potential impacts that may result from land use and planning decisions necessary to implement the Victorville CarMax Auto Superstore Project (the Project). Potential land use impacts that may occur due to the type of development proposed, its location or scale are discussed. Specifically, the discussion in this Section seeks to determine whether the Project would:

- *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

Additionally, as substantiated in the Initial Study (RDEIR Appendix A), the Project's potential impacts under the following topic were previously determined to be less-than-significant and are not further discussed here:

- *Physically divide an established community.*

As supported by the analysis presented in this Section, potential land use and planning impacts of the Project are determined to be less-than-significant.

4.1.1 INTRODUCTION

Land use refers to occupation and employment of properties for various purposes such as commerce, industry, open space, community services, infrastructure, and residential uses. Local land use plans, policies, and development regulations control the types, configurations, and intensities of land uses within the community. Changes in land use patterns resulting from new development can affect overall characteristics of an area, and

may result in physical impacts to the environment. This Land Use and Planning Section of the RDEIR focuses on the Project's consistency with applicable land use plans, policies and regulations, and its potential incompatibilities with land use districts and existing and proposed vicinity development.

4.1.2 SETTING

4.1.2.1 Existing Land Uses

The Project site is a vacant graded property. Properties to the north are currently vacant, beyond which are fast food restaurants. Immediately west of the Project site is a vacant graded pad. Farther west, across Civic Drive, are commercial uses. Southerly adjacent to the Project site are auto dealership uses. The easterly boundary of the Project site is defined by the Roy Rogers Drive/Interstate 15 on-ramp and Interstate 15. Please refer also to RDEIR Section 3.0, *Project Description*, Figure 3.2-1.

4.1.2.2 General Plan Land Use and Zoning Designations

The existing Project site General Plan Land Use designation is Commercial. The Zoning designation for the Project site is Specific Plan. The site is located within the Civic Center Community Sustainability Specific Plan (Specific Plan). Existing Project site General Plan Land Use and Zoning designations are presented at RDEIR Section 3.0, *Project Description*, Figure 3.4-1.

The Specific Plan, adopted in 2016, encompasses 473 acres located in the central portion of the City of Victorville. The Specific Plan contains four district types: Commercial, Business, Government/Service, and Mixed-Use.

The Commercial District includes three land use designations: Community Commercial (CC-1), Civic Commercial (CC-2), and Auto Park (AP). The Project site is located within the CC-2 designation.

The site's existing CC-2 designation does not permit used vehicle sales. As adopted, the Specific Plan only allows used vehicle sales as a conditionally permitted use within the

CC-1 designation. New vehicle sales are only permitted within the AP designation. The CC-2 land use designation does not permit vehicle sales as a permitted or conditionally permitted use.

To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally allow used vehicle sales within the CC-2 designation. The Project site is located immediately adjacent to AP designated properties, and represents a logical continuation of vehicle sales type uses. Design and development of the Project would be regulated by the Specific Plan as amended under the Project.

4.1.3 LAND USE PLANS, GOALS, POLICIES, AND REGULATIONS

The Project would be subject to, and would be required to comply with, applicable land use plans, goals, policies, and regulations, including the City of Victorville General Plan and Zoning Code. In many instances, compliance with existing policies and regulations eliminates, or substantially reduces, potential environmental effects. Existing policies and regulations, to some extent, also indicate community and regional values and prerogatives relative to environmental concerns.

4.1.3.1 Regional Planning

The Southern California Association of Governments (SCAG) is the federally recognized metropolitan planning organization (MPO) for this region, which encompasses over 38,000 square miles, and comprises representatives of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their potential impacts on regional planning programs. As Southern California's MPO, SCAG cooperates with the Mojave Desert Air Quality Management District (MDAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents.

In 2016, SCAG adopted the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).* The 2016 – 2040 RTP/SCS vision encompasses general principles and themes that collectively work to shape the Southern California region. The 2016 – 2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act.

4.1.3.2 City of Victorville General Plan 2030

The City of Victorville General Plan 2030 (General Plan) was developed consistent with State of California General Plan Guidelines, and contains the following Elements: Land Use, Circulation, Housing, Resource, Noise, and Safety. General Plan Land Use designations direct the general character and intensities of land uses within the City boundaries. The Project does not propose or require amendment to the General Plan.

4.1.3.3 Victorville Zoning Ordinance

Zoning is generally considered the primary tool for implementing a general plan. In contrast to the long-term, broad-based outlook of the general plan, zoning is a site-specific device designed to control the locations, densities, and intensities of various land uses. To prevent incompatible land use relationships, the zoning ordinances and accompanying map(s) designate different areas or zones for different types of land uses, and establish standards for development. These standards may specify requirements for lot sizes, lot coverages, building heights, setbacks, parking, landscaping, and other development parameters. In the case of the Project, zoning is established by the Community Sustainability Specific Plan. To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally permit used vehicle sales within the CC-2 designation. The requested SPA also provides that, within the Specific Plan CC-2 land use, sites proposed for used vehicle sales must be a minimum of 4.5 acres (net). In all other aspects, the Project would be required to conform to applicable provisions of the Specific Plan.

4.1.4 STANDARDS OF SIGNIFICANCE

Appendix G of the California Environmental Quality Act Guidelines (*CEQA Guidelines*), as applied by the City of Victorville, indicates that a Project will normally have a significant effect related to land use if it would:

- Physically divide an established community;
- 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.

4.1.5 POTENTIAL IMPACTS AND MITIGATION MEASURES

4.1.5.1 Introduction

The following discussions focus on those areas where it has been determined that the Project may result in potentially significant land use and planning impacts, based on the previous discussions included within this Section and analysis included within the EIR Initial Study (RDEIR Appendix A). Of the CEQA threshold considerations identified above at Section 4.1.4, the Project's potential impacts under the following topic are determined to be less-than-significant, and are not further substantively discussed here: Please refer also to Initial Study Checklist Item X., *Land Use and Planning*.

- Physically divide an established community.

4.1.5.2 Impact Statements

Potential Impact: *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:

General Plan Consistency

The existing General Plan Land Use designation of the Project site is Commercial. The existing Zoning designation of the Project site is Specific Plan (Civic Center Community Sustainability Specific Plan, Civic Commercial [CC-2]). The Project does not propose or require amendment of the General Plan.

Zoning Consistency

Under the Project, the Specific Plan text for the CC-2 land use would be amended to conditionally permit the Project used vehicle sales, and the minimum lot size for used vehicle sales with the CC-2 land use would be 4.5 net acres. In all other aspects, the Project would be required to conform to applicable provisions of the Specific Plan.

SCAG RTP/SCS Consistency

Table 4.1-1 provides the City's analysis of the Project's consistency with the goals of the 2016 – 2040 SCAG Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).

Table 4.1-1
Consistency with SCAG RTP/SCS Goals

RTP/SCS Goals	Remarks
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	**Consistent**: The Project proposes contemporary urban uses, providing an opportunity for development investment on currently underutilized land.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent**: The transportation network in the Project area has been developed and maintained to meet local and regional transportation demands, and to ensure efficient mobility. Recirculated Draft EIR Section 4.2, *Transportation,* addresses local and regional transportation, traffic, and transit in more detail.
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Consistent:** The Project TIA identifies improvements that would promote and facilitate the safe movement of people and goods. All transportation modes within the Project area

Table 4.1-1
Consistency with SCAG RTP/SCS Goals

RTP/SCS Goals	Remarks
	would be required to comply with incumbent regulatory safety standards.
Goal 4: Preserve and ensure a sustainable regional transportation system.	**Consistent:** The Project TIA assesses all potentially affected roadways and identifies required improvements to the existing transportation network. The Project would construct required improvements, and/or would offset its incremental transportation system impacts through payment of requisite transportation/traffic impact fees. Project construction of required improvements and payment of transportation/traffic impact fees preserves and maintains sustainable local and regional transportation systems.
Goal 5: Maximize the productivity of our transportation system.	**Consistent:** Local and regional transportation systems would be improved and maintained to encourage their efficiency and productivity. The City oversees the improvement and maintenance of all aspects of the public right-of-way on an as-needed basis.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	**Consistent:** The Project would accommodate and would not interfere with existing or planned bicycle facilities and improvements. The Project would provide pedestrian connection between the Project site and off-site pedestrian network.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	**Consistent:** Energy-saving and sustainable design features and operational programs would be incorporated in the Project facilities pursuant to California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City of Victorville. The Project would not conflict with efforts to encourage and create incentives for energy efficiency. Prior to final site plan approval and issuance of the first building permit, Project building/facility energy efficiencies would be documented as part of the City's development review processes. Compliance with General Plan energy efficiency requirements would be verified by the City prior to issuance of a Certificate of Occupancy.

Table 4.1-1
Consistency with SCAG RTP/SCS Goals

RTP/SCS Goals	Remarks
Goal 8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	**Consistent:** The Project proposes development with proximate access to local and regional transportation facilities. Intensified development of the Project site in combination with existing proximate urban development acts to focus transit ridership base, thereby supporting existing and future transit opportunities.
Goal 9: Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Consistent:** The City of Victorville is responsible for monitoring of roadways and transit routes to determine the adequacy and safety of these systems. The City and other local and regional agencies and organizations (e.g., RTA, Caltrans, and SCAG) cooperatively manage these systems. Security situations involving roadways and evacuations would be addressed through City emergency response plans.

Sources: Goal Statements from: 2016–2040 RTP/SCS; Remarks by Applied Planning, Inc.

Conclusion

The SPA proposed by the Project is intended to achieve land use designations that best represent the development and land use activities contemplated by the Project. The Project would otherwise be required to conform to all applicable Specific Plan criteria. Additionally, the Project would be consistent with goals presented within the General Plan and established by the 2016 – 2040 RTP/SCS.

When a project includes amendments to the applicable land use designation(s), inconsistency with the existing designation(s) is an element of the project itself, which then requires a legislative policy decision of the agency. The requested amendment(s) and subsequent approval of the requested amendment(s) does not signify a potentially significant environmental effect.

As supported by the preceding discussions, the potential for the Project to 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 is considered less-than-significant.

Level of Significance: Less-Than-Significant.

4.2 TRANSPORTATION

4.2 TRANSPORTATION

Abstract

This discussion of potential transportation impacts presented here is organized under three general headings:

- *Vehicle Miles Traveled Analysis;*
- *Level of Service Analysis; and*
- *Other Transportation Topics.*

Analysis content and findings under these general topical headings is summarized below.

Vehicle Miles Traveled (VMT) Assessment

Consistent with CEQA Guidelines *Section 15064.3 (b) requirements, this RDEIR Transportation Section addresses potential Vehicle Miles Traveled (VMT) impacts of the Project. As substantiated herein, the Project would not exceed the City's VMT Daily Vehicle Trip Threshold of 1,285 weekday daily trips. Under the City's VMT Analysis Guidelines, a VMT analysis for the Project is not required. Projects not requiring a VMT analysis would result in less-than-significant VMT impacts.*

Additionally, as provided for in Technical Advisory on Evaluating Transportation Impacts in CEQA *(California Office of Planning and Research [OPR) December 2018 (Technical Advisory)* "[a] project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa" *(Technical Advisory, p. 6). As substantiated herein, Project VMT impacts would be less-than-significant. Per*

the OPR Technical Advisory guidance presented above, the Project cumulative VMT impacts would also be less-than-significant.

Level of Service (LOS) Analysis

Section 15064.3 of the CEQA Guidelines*, provides that except for roadway capacity projects,* "a project's effect on automobile delay (Level of Service [LOS]) shall not constitute a significant environmental impact." *The City nonetheless requires LOS analyses pursuant to City General Plan Policies and City Traffic Impact Analysis Guidelines. For City uses and informational purposes, this Section addresses LOS deficiencies that would occur under the* Project. Detailed *LOS analyses are presented in* Traffic Impact Analysis, CarMax, Victorville, California *(Michael Baker International) June 3, 2019 (Project TIA, TIA). The Project TIA is presented at RDEIR Appendix B.*

Other Transportation Topics

Other transportation topics evaluated in this Section include the following:

- *Potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;*

- *Potential to substantially increase hazards to a geometric design feature; or result in inadequate emergency access.*

The analysis presented here substantiates that Project impacts under the preceding "other transportation topics" would be less-than-significant.

4.2.1 VMT ASSESSMENT

4.2.1.1 Background

Transportation impact analyses prepared by the City have historically been based on level of service (LOS) and similar vehicle delay/congestion metrics. The LOS analytic model provides a reasonable assessment of vehicle congestion and driving conditions that may result from a given development project. LOS analyses do not however evaluate

the range and magnitude of other environmental effects attributable to development traffic, including fuel consumption, criteria air pollutant emissions, and greenhouse gas emissions. These latter issues have however been historically addressed, and are currently addressed within this EIR's *Air Quality*, *Greenhouse Gas Emissions*, and *Energy* Sections. In response to these latter concerns and to comprehensively evaluate environmental impacts of development traffic, the *CEQA Guidelines* (amended December 2019) include new Section 15064.3 addressing transportation impacts. In summary, *CEQA Guidelines* Section 15064.3 establishes Vehicle Miles Traveled (VMT) as the appropriate metric for evaluation of project transportation impacts.

Consistent with *CEQA Guidelines* Section 15064.3 requirements, the City has implemented Vehicle Miles Traveled (VMT) Analysis Guidelines.[1] The City VMT Analysis Guidelines comprise the official document in which transportation impacts for development projects will be analyzed under the California Environmental Quality Act (CEQA). The City VMT Analysis Guidelines and substantiating background information are provided at RDEIR Appendix B.

4.2.1.2 Project VMT Impact Analysis

Per the City VMT Analysis Guidelines "[p]rojects that will not require a VMT analysis can be screened using either the daily vehicle trips generated by project or the project's land use" (VMT Analysis Guidelines, p. 1). In this regard, the VMT Analysis Guidelines provide that projects that result in net increase of 1,285 or less weekday daily trips do not require a VMT analysis (VMT Analysis Guidelines, p. 1).

Existing Conditions

The Project site is vacant and is not a source of VMT. Please refer also to the discussions of Existing Conditions presented under the Level of Service Analysis in this Section.

[1] City of Victorville Resolution No. 20-031 "A Resolution of The City Council of The City of Victorville City Council Adopting Local Guidelines for Vehicle Miles Traveled(VMT) Thresholds of Significance for Purposes of Analyzing Transportation Impacts Under The California Environmental Quality Act (CEQA)."

Project Trip Generation

Project trip generation is summarized at Table 4.2-1. Trip generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Institute of Transportation Engineers (ITE) trip generation rates and equations for different land uses are utilized by the City in determining development-related trip generation characteristics and were employed in the Project TIA in estimating the Project's trip generation.[2] As indicated at Table 4.2-1, the Project would generate an estimated net total of 205 trip-ends per day on a typical weekday; approximately 32 Midday peak hour trips; and approximately 28 PM peak hour trips.

Table 4.2-1
Project Trip Generation (PCE)

			Midday Peak Hour			PM Peak Hour			Daily		
Land Use	**Quantity**	**Metric**	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Automobile Sales-Used (ITE Land Use Code 841)	7.59	TSF	19	13	32	13	15	28	103	103	205*

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: * Does not total due to rounding.

As presented at Table 4.2-1, the Project would generate a total of 205 daily trips. Project trip generation would therefore not exceed the City VMT Guidelines screening threshold of 1,285 weekday daily trips. VMT analysis is therefore not required and Project VMT impacts are less-than-significant.

Level of Significance: Less-Than-Significant.

[2] Project trip generation rates from ITE *Trip Generation* Manual, 10th Edition, 2017.

4.2.2 LEVEL OF SERVICE (LOS) ANALYSIS

4.2.2.1 Overview

The Project TIA evaluates the potential for the Project to result in or cause LOS deficiencies in the Study Area. The TIA Study Area is presented in Figure 4.2-1. The TIA was prepared in consultation with the City of Victorville (City) and in accordance with:

- The City-approved Traffic Study Scoping Agreement (TIA Appendix A); and
- *Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County*.

The TIA employs Level-Of-Service (LOS) analysis methodology to identify potential LOS deficiencies. The TIA considered cumulative effects of Project traffic in combination with ambient traffic and effects of traffic generated by approved or planned related projects.

For the purposes of the TIA and the RDEIR analyses, all Project facilities are assumed to be complete and operational by 2021, the Project Opening Year.

Analyses of traffic conditions are presented for Existing (2018) Conditions, Project Opening Year (2021) Conditions, and Horizon Year (2031) Conditions.

Additionally, for informational purposes, a "Vacant Parcels Alternative Development Scenario" analysis is provided. This analytic scenario indicates likely traffic impacts that would result assuming certain development of site adjacent parcels within the Horizon Year (2031) timeframe.

N

NOT TO SCALE

Source: Michael Baker International (6/3/19)

*Project site plan boundaries may not reflect the boundary presented in Figure 3.5-1, Conceptual Site Plan. Findings and conclusions of the technical studies are not affected.

appliedplanning inc

Figure 4.2-1
TIA Study Area

4.2.2.2 Intersection Analysis

Intersection Level of Service (LOS)

Traffic operations of roadway intersection facilities are described in terms of Levels of Service (LOS). The TIA intersection analyses employed the Highway Capacity Manual (HCM) 6th Edition methodology. LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS "A," representing completely free-flow conditions, to LOS "F," representing breakdown in traffic flow resulting in stop-and-go conditions. LOS "E" represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. Tables 4.2-2 and 4.2-3 present LOS for signalized and unsignalized intersections within the Study Area.

Table 4.2-2
Signalized Intersection LOS

Level of Service	Description	Average Control Delay (seconds)
A	Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00
B	Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop, and individual cycle failures are noticeable.	35.01 to 55.00
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	80.01 and up

Source: HCM 6th Edition.

Table 4.2-3
Unsignalized Intersection LOS

Level of Service	Description	Average Control Per Vehicle (seconds)
A	Little or no delays.	0 to 10.00
B	Short traffic delays.	10.01 to 15.00
C	Average traffic delays.	15.01 to 25.00
D	Long traffic delays.	25.01 to 35.00
E	Very long traffic delays.	35.01 to 50.00
F	Extreme traffic delays; intersection capacity exceeded.	50.01 and up

Source: HCM 6th Edition.

Study Area Intersections

Five Study Area intersections, listed at Table 4.2-4, were selected for analysis. Intersection jurisdiction and San Bernardino County Congestion Management Program (CMP) designation are also identified. In an effort to conduct a conservative analysis, the TIA Study Area includes intersection locations beyond those required based on a typical 50 peak hour trip criterion.[3]

Table 4.2-4
Study Area Intersections

ID No.	Intersection Location	Existing Traffic Control	Jurisdiction	CMP Facility?
1	Civic Drive and Home Depot South Driveway/ (Project Site Dwy. No. 1)	OWSC	Victorville	No
2	Civic Drive and Home Depot North Driveway/ (Project Site Dwy. No. 2)	TWSC	Victorville	No
3	Civic Drive and Roy Rogers Drive	Signalized	Victorville	No
4	Roy Rogers Drive and I-15 Southbound Ramps	Signalized	Caltrans	Yes
5	Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive	Signalized	Caltrans	Yes

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: OWSC = One-Way Stop Control; TWSC = Two-Way Stop Control.

[3] The 50 peak hour trip criterion is a widely employed traffic engineering protocol used to define the potential area of a given project's traffic impact (i.e., Study Area). The 50 peak hour trip criterion is employed by the City of Victorville and throughout San Bernardino County.

4.2.2.3 Roadway Segment Analysis

Roadway Segment Capacities

Table 4.2-5 summarizes Study Area roadway segment average daily traffic (ADT) capacities by roadway classification; and indicates LOS performance standards for each roadway classification based on conveyed ADT volumes. Study Area roadway segment capacities and LOS performance standards employed in the TIA are based on roadway segment capacities and LOS performance standards from: *Civic Center Community Sustainability Plan Traffic Study* (City of Victorville) January 2014 (Sustainability Plan Traffic Study, Table 1).

Table 4.2-5
Roadway Classification, Capacity, and Corresponding LOS

Roadway Classification	No. Lanes	Roadway Capacity and Corresponding LOS				
		LOS A	LOS B	LOS C	LOS D	LOS E
Super Arterial	6	33,900	39,400	45,000	50,600	56,300
Super Arterial	5	28,250	32,830	37,500	42,170	46,920
Arterial-Divided	4	22,500	26,300	30,000	33,800	37,500
Arterial-Undivided	4	15,000	17,500	20,000	22,500	25,000
Collector	2	11,300	13,200	15,000	17,000	18,800
Local	2	7,500	8,800	10,000	11,300	12,500

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.

Roadway capacities identified at Table 4.2-5 are employed for planning purposes and are affected by factors including intersections (spacing, configuration and control features); roadway access control(s), grades, design geometrics; sight distance limitations; car/truck vehicle mix; and presence of, or accommodations for, pedestrian and bicycle traffic. If the analysis of intersections along the affected roadway segments indicates that the controlling intersections would operate acceptably under peak hour conditions, additional through lane improvements other than those identified at the affected intersections would not be required.

Study Area Roadway Segments

Evaluated Study Area roadway segments were identified in consultation with City of Victorville staff. Table 4.2-6 identifies evaluated Study Area roadway segments and jurisdiction of each.

Table 4.2-6
Study Area Roadway Segments

Roadway	Segment Limits	Jurisdiction
Civic Drive	Seneca Drive to Project Dwy. No .1	Victorville
	Project Dwy. No. 1 to Project Dwy. No. 2	
	Project Dwy. No. 2 to Roy Rogers Drive	
Roy Rogers Drive	Amargosa Road to Civic Drive	Victorville
	Civic Drive to I-15 SB Ramps	
	I-15 SB Ramps to I-15 NB Ramps	
	East of I-15 NB Ramps	

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.

4.2.2.4 Jurisdictional Definitions for System Capacity and Operational Standards

Definitions for circulation system facilities capacities established by the City and other potentially affected jurisdictions are presented below.

City of Victorville

Intersections

The City of Victorville has adopted LOS D or better as the minimum acceptable peak hour intersection operating condition for all non-CMP intersections.

Roadway Segments

The City of Victorville seeks to maintain LOS C or better on all non-CMP roadways segments (General Plan EIR, p. 5.1-41, et al.).

Caltrans

Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D on the State Highway System (SHS). However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing SHS facility is operating at less than this target LOS, the existing [Measure of Effectiveness] MOE should be maintained.[4] For the purposes of this analysis, LOS D is considered to be the minimum acceptable operating condition for Caltrans facilities within the Study Area. This is also consistent with City of Victorville and San Bernardino County LOS standards for signalized intersections.

Congestion Management Plan (CMP) Facilities

For CMP segments and intersections, the City of Victorville seeks to maintain LOS E or better (General Plan EIR, p. 5.15-41 (et al.). Within this analysis, LOS D has nonetheless been conservatively applied as the minimum acceptable operational condition for Study Area CMP facilities.

4.2.2.5 LOS Deficiency Criteria

Respective jurisdictional deficiency criteria for the various Study Area facilities are summarized below.

<u>City of Victorville Intersections</u>

LOS deficiencies would occur if Project traffic would result in any of the following;

- Degradation of intersection LOS from acceptable conditions (LOS D or better) to unacceptable conditions (LOS E or F); or

- If the intersection is already operating at an unacceptable LOS (LOS E or F) and the addition of Project traffic degrades intersection operations (increases delay) by two percent or more.

[4] *Guide for the Preparation of Traffic Impact Studies* (State of California, Department of Transportation) December 2002.

Caltrans Intersections

Certain of the Study Area intersections are under Caltrans jurisdiction. Caltrans has not established specific deficiency criteria for determining Project-related impacts at potentially affected Study Area intersections under Caltrans jurisdiction. Consistent with the TIA Scoping Agreement, the following San Bernardino County deficiency criteria were applied to Caltrans intersections in the Study Area.

Signalized Intersections:

Project traffic would result in LOS deficiencies under the following conditions:

- Degradation of intersection LOS from acceptable conditions (LOS D or better) to unacceptable conditions (LOS E or F); or

- If the intersection is already operating at an unacceptable LOS (LOS E or F) and the addition of Project traffic further degrades intersection operations.

Un-signalized Intersections:

LOS deficiencies would occur if Project traffic would trigger deficiency criterion a); or Project traffic would trigger both deficiency criteria b) and deficiency criteria c).

a) The addition of project traffic causes the intersection LOS to change from a LOS D or better to a LOS E or worse;

OR

b) The project contributes additional traffic to an intersection that is already projected to operate at a LOS E or F with background traffic;

AND

c) One or both of the following conditions are met:

1.) The project adds ten (10) or more trips to any approach; or

2.) The intersection meets the peak hour traffic signal warrant after the addition of project traffic.

City of Victorville Roadway Segments

For Study Area segments within the City of Victorville or roadway segments that are under shared jurisdiction with the City of Victorville, LOS deficiencies would occur under the following conditions:

- Degradation of roadway segment LOS from acceptable conditions (LOS C or better) to unacceptable conditions (LOS D or worse); or

- If the roadway segment is already operating at an unacceptable LOS (LOS D or worse) and the addition of Project traffic would increase the roadway segment volume-to-capacity (v/c) ratio by two percent or greater.[5]

4.2.3 EXISTING CONDITIONS

4.2.3.1 Overview

The following discussions summarize the existing Study Area circulation system and describe other transportation modes that exist within, or are available to, the Study Area.

4.2.3.2 Existing Roadway System

The major factors affecting access to the Project site are the location of the site and the efficiency of the roadway system serving the site. Efficiency of access is a function of travel time, convenience, directness, and available capacity of the routes utilized in accessing the development.

[5] The City of Victorville does not expressly quantify acceptable v/c increases for roadways currently operating at unacceptable LOS. For the purposes of this analysis, for roadways currently operating at unacceptable LOS, a 2 percent increase in roadway segment v/c resulting from Project traffic is considered a deficiency. This correlates with the 2 percent increase in intersection delay that would be considered a deficiency when a given intersection is operating at unacceptable LOS under pre-Project conditions.

Regional Access

Interstate 15 (I-15) traverses western San Bernardino County providing regional access to the City of Victorville and surrounding communities. Within the Study Area, I-15 is currently a six-lane divided freeway.

Access to I-15 to/from the Project would be provided via Roy Rogers Drive and the Roy Rogers Drive/I-15 interchange. I-15 interchanges with Roy Rogers Drive approximately 0.2 miles northeasterly of the Project site.

Site Access

Access to the Project would be provided by existing Civic Drive (N – S). Project access to Civic Drive would be provided by "north" and "south" Project driveways. The Project driveways would be aligned with existing driveways providing access to the Home Depot center located westerly of the Project site, across Civic Drive.

4.2.3.3 Alternative Transportation Modes

Alternative transportation modes and transportation services available to the Study Area are described below.

Bus Services

The Study Area is currently served by Victor Valley Transit Authority (VVTA) Routes 200 and 52. In the vicinity of the Project, Route 200 runs along Civic Drive and Roy Rogers Drive; Route 52 runs along Roy Rogers Drive. VVTA regularly reviews ridership demands and travel patterns to maintain convenient and efficient bus transportation within its Service Area. Current VVTA bus routes and schedules are available at: https://vvta.org/interactive-map/.

Bicycle Facilities and Pedestrian Access

The *City of Victorville Non-Motorized Transportation Plan*, June 2010, indicates a Class III bike lane along Civic Drive adjacent to the Project site (Non-Motorized Transportation Plan, p. 95, Exhibit 6.1). The Project concept does not propose or require facilities or programs that would conflict or interfere with development and implementation of

planned or proposed bicycle facilities. On-site Project bicycle amenities would be provided consistent with the Specific Plan requirements (e.g., "Permanent bicycle racks shall be included in all new developments," Specific Plan p. 3-3).

Pedestrian access would be provided by existing sidewalks along Civic Drive. All right-of-way improvements, including any temporary or interim improvements affecting Civic Drive would be designed and constructed consistent with City Conditions of Approval.

4.2.3.4 Existing Traffic Volumes

Existing Study Area peak hour traffic volumes were determined by field traffic counts conducted in July 2018. The traffic counts included the following vehicle classifications: Passenger Cars, 2-Axle Trucks, 3-Axle Trucks, and 4 or More Axle Trucks. To represent the impact large trucks, buses and recreational vehicles have on traffic flow; all trucks were converted into passenger car equivalents (PCE). By their size alone, trucks and similar size vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slow-down is much longer than for passenger cars and varies depending on the type of vehicle and number of axles. For the purpose of this analysis, a PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks.

Traffic counts were conducted during the Midday Peak Hour[6] (11:30 AM – 1:00 PM) and Evening (PM) Peak Hour (4:00 PM – 6:00 PM) conditions. The TIA traffic count data is considered representative of peak hour traffic conditions in the Study Area. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity that would prevent or limit roadway access and detour routes. Diagrammatic representations of existing intersection traffic volumes are presented at TIA Exhibit 3-4. Raw manual peak hour turning movement traffic count data sheets are provided at TIA Appendix C.

[6] The Midday peak hour was evaluated as opposed to a more typical Morning (AM) peak hour per the request of City staff. In this regard, City staff notes that in the vicinity of the Project, the Midday peak hour is generally more congested than the AM peak hour.

4.2.3.5 Existing Conditions-Intersection Operations

Table 4.2-7 summarizes Existing Conditions (2018) intersection LOS deficiencies within the Study Area. All other Study Area intersections operate acceptably during the peak hour periods. For a complete listing of all existing Study Area intersection LOS conditions, please refer to TIA Table 3-2.

Table 4.2-7
Intersection Deficiencies, Existing Conditions

		Traffic Control	Midday		PM		Jurisdiction/ LOS Std.
ID #	Intersection		Delay	LOS	Delay	LOS	
2	Civic Drive and Home Depot North Dwy./ (Project Site Dwy. No. 2)	TWSC	**47.0**	**E**	**38.0**	**E**	Victorville/ LOS D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: TWSC = Two-Way Stop Control; Deficiencies are indicated by **bold** text.

4.2.3.6 Existing Conditions-Roadway Segment Operations

Under Existing Conditions, all Study Area roadway segments operate acceptably during the peak hour periods. For a complete listing of all existing Study Area roadway segment LOS conditions, please refer to TIA Table 3-3.

4.2.4 FUTURE TRAFFIC VOLUMES

The following discussions identify traffic volumes anticipated to be generated by the Project, and traffic attributable to other growth and development within the Study Area.

4.2.4.1 Project Trip Generation

Project trip generation is summarized at Table 4.2-8. Trip generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Institute of Transportation Engineers (ITE) trip generation rates and equations for different land uses are utilized by the City in determining development-related trip generation characteristics and were employed in the Project TIA in estimating the Project's trip generation.[7] As indicated at Table 4.2-8, the Project would generate an

[7] Project trip generation rates from ITE *Trip Generation* Manual, 10th Edition, 2017.

estimated net total of 205 trip-ends per day on a typical weekday; approximately 32 Midday peak hour trips; and approximately 28 PM peak hour trips.

Project traffic volumes considered in this analysis represent the likely maximum traffic generation. The assumptions and methods used to estimate the Project trip generation characteristics are discussed in greater detail at TIA Section 4.1, *Project Forecast Trip Generation*.

Table 4.2-8
Project Trip Generation (PCE)

			Midday Peak Hour			PM Peak Hour			Daily		
Land Use	**Quantity**	**Metric**	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Automobile Sales-Used (ITE Land Use Code 841)	7.59	TSF	19	13	32	13	15	28	103	103	205*

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: * Does not total due to rounding.

4.2.4.2 Project Trip Distribution

The trip distribution process establishes the directional orientation of traffic approaching and departing the site. Trip distribution is influenced by the location of the site in relation to nearby residential, employment and recreational opportunities, and proximity to the regional freeway system. Based on the trip distribution patterns, peak hour trips were assigned at Study Area intersections. Configurations of roadways and land uses within the Study Area would influence trip distribution characteristics over time. The assumptions and methods used to determine the Project trip distribution characteristics are discussed in greater detail at TIA Section 4.2, *Trip Distribution and Trip Assignment of Proposed Project.*

4.2.4.3 Opening Year (2021) Traffic Conditions

Per the TIA Scoping Agreement, Opening Year (2021) traffic conditions reflect 3 years of background (ambient) traffic growth at 2 percent per year for the period 2018 – 2021.

Estimated ambient growth in traffic has been added to existing traffic volumes to account for traffic growth not otherwise assigned to specific related development projects.[8]

To establish Opening Year traffic volumes, the assumed ambient background traffic growth was then added to existing daily and peak hour traffic volumes on Study Area roadways in addition to traffic generated by the development of related projects that have been approved but not yet constructed, and/or for which development applications have been filed and are under consideration by governing agencies. The TIA conservatively assumes that all cumulative projects would be complete, fully occupied, and generating traffic by the Project Opening Year. Please refer to TIA Table 6-1 for details regarding evaluated cumulative projects.

4.2.4.4 Horizon Year (2031) Traffic Conditions

Per the TIA Scoping Agreement, traffic projections for Horizon Year (2031) Conditions assume an annual growth rate of 2% per year applied to the Opening Year 2021 Without Project traffic volumes.

4.2.4.5 Horizon Year (2031) Vacant Parcel Development Scenario

As requested by the City, a focused Horizon Year (2031) operational analysis was prepared that assumes certain development of currently vacant parcels (pads) located adjacent to the Project site. Traffic generated by assumed development of the considered adjacent pads was added to the Horizon Year 2031 Traffic Condition.

4.2.5 LOS DEFICIENCIES AND RECOMMENDED IMPROVEMENTS

4.2.5.1 Overview

The following discussions identify Study Area LOS conditions without and with the Project. Potential LOS deficiencies are identified under Existing (2018) Conditions, Opening Year (2021) Conditions, Horizon Year (2031) Conditions, and Horizon Year

[8] Related development projects are those approved or anticipated development proposals that would generate traffic interacting with traffic generated by the Project.

Vacant Parcel Development Scenario. Sub-topics evaluated under each of these scenarios include:

- Intersection LOS Analysis; and
- Roadway Segment LOS Analysis.

Potential LOS deficiencies that would result from or would be exacerbated by Project traffic contributions are identified, and improvements are recommended to resolve potential deficiencies. The Applicant would either construct recommended traffic improvements, or pay requisite fees that would be assigned to construction of recommended traffic improvements.

Improvements Constructed as Part of the Project

Consistent with City Conditions of Approval, the Project would construct site-adjacent and on-site improvements necessary to ensure safe and efficient access and circulation system operating conditions in the Project vicinity and within the Project site.

Other Required Improvements Funded by Fee Assessments and Constructed Consistent with Capital Improvements Programs and in Response to Demonstrated Demands

The Project would pay all requisite fees directed to the completion of necessary off-site Study Area traffic improvements at locations where Project traffic would contribute to existing or projected circulation system deficiencies.

- For required City of Victorville jurisdictional improvements listed on the City's Capital Improvements Program or other adopted improvements plan, payment of Development Impact Fees (DIF) [Traffic Impact Fee Program component] would fulfill the Applicant's transportation/traffic impact mitigation responsibilities. Similarly, for required extra-jurisdictional improvements identified on the CMP/Measure I exhibit(s), payment of DIF would fulfill the Applicant's mitigation responsibilities. DIF collected by the City of Victorville would be allocated for regional traffic improvements as provided for under Measure I. Additionally,

area-serving transportation system improvements are funded generally through sales taxes collected under Measure I.

- For required City of Victorville jurisdictional improvements that are not identified on the City's Capital Improvements Program or other adopted improvements plan, but are consistent with the General Plan Circulation Element, fair share participation in improvements funding would fulfill the Applicant's transportation/traffic impact mitigation responsibilities.

Fee Assessment Mechanisms and Fee Programs

The Applicant would comply with all fee assessment requirements and fee programs. However, payment of fees would not ensure timely completion of required circulation system improvements. Within these discussions, potentially significant transportation/traffic impacts that are addressed through fee payments are considered to remain cumulatively significant and unavoidable pending completion of required improvements. Transportation/traffic impact fees that would be assessed of the Project and descriptions of fee programs assessment and fee assignment mechanisms are summarized below.

City of Victorville Development Impact Fee Program

To facilitate and fund the construction of roadway improvements, and thereby reduce potential impacts on the City's circulation system, the City of Victorville currently implements a qualified Traffic Impact Fee Program through which the City assesses and collects fees from new development. The Traffic Impact Fee, which is part of the larger DIF Program,[9] is assessed on new development to pay for the development's share of roadway improvements needed to maintain adequate levels of service and to prevent further degradation of roadway facilities currently operating at deficient levels. The

[9] The City's commercial DIF as of 2019 is $9.28 per square foot. Of this, $7.60 is allocated for road capital improvements costs. Source: *Building Fees-Commercial* (City of Victorville Development Department) Updated 1/30/2019.
See also: https://www.victorvilleca.gov/government/city-departments/development/permit-center/fees-forms/fee-schedules

City's Traffic Impact Fee Program is consistent with the provisions of the California Mitigation Fee Act, Government Code, and Section 66000, et seq.

In compliance with the Mitigation Fee Act, after the City collects impact fees, the fees are deposited into a separate capital facilities account to avoid any co-mingling of the fees with other City revenues and funds. The fees, and any interest thereon, must be expended solely for the purpose for which the fees were collected. The City's DIF Program thus creates a mechanism for charging fees for new development for purposes of defraying the cost of public roadway facilities related to such development. The City's DIF Program is a result of a comprehensive analysis of the need for future roadway infrastructure improvements and it allows the City to deal logically and reasonably with the cumulative impacts of development.

The timing of the improvements is established through the City's Capital Improvement Program ("CIP"). This program is overseen by the City's Public Works Department and is amended on a periodic basis to add projects that the City identifies as required to maintain adequate levels of service on City roadway facilities or to remove projects which have been fully funded, constructed and completed. The roadway improvements identified in the CIP consist of improvements that improve city roadway facilities consistent with the City's General Plan Circulation Element. Periodically (i.e., each year), the City conducts traffic counts, reviews traffic accident reports and reviews traffic trends throughout the City. The City uses this data to determine necessary roadway improvements and to ensure that construction of needed improvements occurs prior to, or concurrent with, the time they are necessary to achieve performance levels established by the City. In this way, improvements are typically constructed before the levels of service degrade beyond one of the City's performance standards. The City has an established, proven track record in implementing the DIF Program.

Consistent with City Municipal Code requirements (Municipal Code Sec. 16-5.01.080: - *Development impact fee*, et al.) the Project Applicant would pay the requisite City DIF at the rate(s) then in effect. DIF would be calculated at issuance of building permit(s) and

would be collected at the time of final inspection for development (at issuance of final Certificate[s] of Occupancy).

City of Victorville Fair Share Traffic Fees

In addition to its DIF Program, the City collects fair share traffic fees for improvements that are not currently programmed into the City's most recent CIP and DIF Program. These fees are assessed on a project-by-project basis as identified by each project's traffic impact analysis, to ensure that sufficient funds are available for construction of such roadway improvements if and when it becomes necessary. As with the City's DIF Program, these fair share fees are placed in a separate interest-bearing account in accordance with the requirements of the Mitigation Fee Act. As stated above, the City conducts periodic traffic counts, reviews traffic accidents and traffic trends throughout the City to determine the appropriate timing of roadway improvements. Based on this data, the City adds the identified improvements to the City's Capital Improvement Program and ensures that needed City improvements are constructed prior to the time at which the facilities are forecast to fail to achieve performance levels.

The Project's greatest traffic volume contributions represent the Project's proportional impacts at affected intersections and would be the basis for fair share fee assessments. Fair share fees would be assessed in instances where the costs of improvements are not otherwise funded through Project payment of other established fee assessment mechanisms.

County of San Bernardino Measure I

Measure I implemented a San Bernardino County 20-year half-cent sales tax, approved by the San Bernardino County voters in 1989. It is designated for transportation planning, design, construction, operation, and maintenance of regional roadway facilities throughout portions of San Bernardino County. The improvements funded through Measure I include installation of traffic signals, road maintenance efforts, storm drain facilities, bridges, upgrades to meet American Disabilities Act (ADA) standards and other projects related to local transportation, and transit service improvements. In November 2004, the voters extended Measure I through year 2031, and several transportation

projects in the vicinity of the Project are included for planning, design, right-of-way acquisitions and/or construction efforts over the next 30 years.

Funds collected through the Measure I program are distributed among County jurisdictions in accordance with the Measure I Expenditure Plan. Pursuant to Measure I, 65 percent of those funds are used for improvements to City streets that function as major arteries in the region, while 30 percent is earmarked for improvements to local streets. The remaining five percent is designated for public transit.

Measure I funds are not to be used for construction of roadway facilities necessitated by new development. The existence of Measure I does not relieve a municipality from requiring new development to contribute for the cost of roadway improvements necessitated by such development. Under Measure I, each local agency is required to adopt a development financing mechanism requiring all future development to pay its fair share for needed transportation facilities as a result of new development. This provision of Measure I is included in the San Bernardino County Congestion Management Program as implemented by the San Bernardino Association of Governments (SANBAG), the Council of Governments and Transportation Planning Agency for San Bernardino County.

In accordance with Measure I and San Bernardino County CMP, SANBAG prepared a Development Mitigation Nexus Study to identify fair share contributions for new development for regional transportation improvements (freeway interchanges, railroad grade separations, and regional arterial highways). The Nexus Study identifies an estimate of fair share development contributions for regional transportation improvements by local jurisdiction. The calculated fair share targets for each local jurisdiction provide the basis for fair share contribution that must be collected through each jurisdiction's DIF Program.

The City of Victorville is in compliance with the requirements of Measure I and the San Bernardino County CMP through its current DIF Program. Accordingly, SANBAG has determined that the City's DIF Program is sufficient to fund the City's fair share of the

regional improvements included within the CMP Nexus Study, as well as the improvements within the City necessitated by new development.

4.2.5.2 LOS DEFICIENCY ANALYSIS

Existing (2018) Conditions, Opening Year (2021) Conditions, Horizon Year (2031) Conditions, and Horizon Year Vacant Parcel Development Scenario

OVERVIEW

The following discussions summarize traffic conditions within the Study Area reflecting implementation of the Project under Existing Conditions, Opening Year Conditions, Horizon Year, and the Horizon Year Vacant Parcel Development Scenario. In each context, deficient conditions are identified. Improvements are recommended for identified deficient conditions.

EXISTING CONDITIONS (2018) TRAFFIC ANALYSIS

The Existing Conditions (2018) analysis provides an indication of the incremental effects of the Project without the addition of assumed future cumulative traffic growth. Project Driveways, frontage right-of-way improvements, and other facilities to be constructed by the Project (e.g., intersection turn lane improvements at Project Driveways) are assumed to be in place. In the following analysis of Existing With-Project Conditions, the following subtopics are discussed:

- Intersection LOS Analysis; and
- Roadway Segment LOS Analysis.

Intersection LOS Analysis

Intersection operations under Existing and Existing With-Project Conditions are presented at Table 4.2-9 together with applicable jurisdictional LOS standards. As indicated at Table 4.2-9, under Existing With-Project Conditions, intersection No. 2 would operate at deficient LOS E conditions. However, Project traffic would not result in intersection LOS deficiencies that would exceed applicable LOS deficiency criteria.

Table 4.2-9
Intersection Operations
Existing Conditions and Existing Conditions With-Project

ID No.	Intersection	Traffic Control	Existing Conditions				Existing Conditions With-Project				With-Project Change in Delay		Jurisdiction/ Deficiency Criteria	Deficiency Criteria Exceeded?
			Midday		PM		Midday		PM					
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Midday	PM		
1	Civic Drive and Home Depot South Dwy./ (Project Site Dwy. No.1)	OWSC	14.5	B	14.6	B	14.6	B	14.9	B	0.1	0.3	Victorville/ Increase in LOS to "E" or greater.	No
2	Civic Drive and Home Depot North Dwy./ (Project Site Dwy. No.2)	TWSC	**47.0**	**E**	**38.0**	**E**	**45.7**	**E**	**38.1**	**E**	-1.3	0.1	Victorville/ Increase in delay of 2% or greater.	No
3	Civic Drive and Roy Rogers Drive	Signal	16.0	B	16.3	B	16.1	B	16.5	B	0.1	0.2	Victorville/ Increase in LOS to "E" of greater.	No
4	Roy Rogers Drive and I-15 Southbound Ramps	Signal	11.2	B	13.5	B	11.2	B	13.7	B	0.0	0.2	Caltrans/ Increase in LOS to "E" or greater.	No
5	Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive	Signal	41.2	D	46.8	D	42.1	D	47.5	D	0.9	0.7	Caltrans/ Increase in LOS to "E" or greater.	No

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: TWSC = Two-Way Stop Control; OWSC = One-Way Stop Control; Delay expressed in seconds; Deficiencies are indicated by **bold** text.

Roadway Segment LOS Analysis

Roadway segments operational conditions under Existing and Existing With-Project Conditions are indicated at Table 4.2-10 together with applicable jurisdictional LOS standards. As indicated, all Study Area roadway segments would operate at acceptable LOS under Existing and Existing With-Project Conditions.

Table 4.2-10
Roadway Segment Operations
Existing Conditions and Existing Conditions With-Project

Roadway	Segment Limits	Classification (No. Lanes)	LOS D Capacity ADT	Existing			Existing With-Project			With-Project Δ V/C	Jurisdiction/ LOS Std.
				ADT	V/C	LOS	ADT	V/C	LOS		
Civic Drive	Seneca Drive to Project Dwy. No .1	Arterial-Divided (4)	33,800	8,130	0.241	A	8,161	0.241	A	0.001	Victorville/ LOS D

Table 4.2-10
Roadway Segment Operations
Existing Conditions and Existing Conditions With-Project

Roadway	Segment Limits	Classification (No. Lanes)	LOS D Capacity ADT	Existing			Existing With-Project			With-Project Δ V/C	Jurisdiction/ LOS Std.
				ADT	V/C	LOS	ADT	V/C	LOS		
	Project Dwy. No. 1 to Project Dwy. No. 2	Arterial-Divided (4)	33,800	8,190	0.242	A	8,241	0.244	A	0.002	Victorville/ LOS D
	Project Dwy. No. 2 to Roy Rogers Drive	Arterial-Divided (4)	33,800	11,280	0.334	A	11,454	0.339	A	0.005	Victorville/ LOS D
Roy Rogers Drive	Amargosa Road to Civic Drive	Super Arterial (5)	42,170	19,420	0.461	A	19,441	0.461	A	0.000	Victorville/ LOS D
	Civic Drive to I-15 SB Ramps	Super Arterial (5)	42,170	28,630	0.679	B	28,784	0.683	B	0.004	Victorville/ LOS D
	I-15 SB Ramps to I-15 NB Ramps	Arterial-Divided (4)	33,800	25,850	0.765	B	25,953	0.768	B	0.003	Victorville/ LOS D
	East of I-15 NB Ramps	Arterial-Divided (4)	33,800	23,190	0.686	B	23,211	0.687	B	0.001	Victorville/ LOS D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.

OPENING YEAR (2021) TRAFFIC ANALYSIS

Opening Year traffic volumes and levels of service reflect anticipated conditions at Project completion and opening in the year 2021. The Opening Year (without Project) condition reflects Existing (2018) traffic volumes, plus additional background traffic that would be generated by generalized ambient growth within the region as well as traffic generated by known or probable cumulative projects. Cumulative projects comprise approved or anticipated development proposals that could generate traffic potentially interacting with Project traffic.

In the following analysis of Opening Year Conditions, the following subtopics are discussed:

- Intersection LOS Analysis; and
- Roadway Segment LOS Analysis.

Intersection LOS Analysis

Intersection operations under Opening Year Without-Project and Opening Year With-Project Conditions are summarized at Table 4.2-11. As indicated, under Opening Year With-Project Conditions, Project traffic would result in increased intersection delays that would exceed applicable LOS deficiency criteria at Study Area Intersections No. 2 and No. 5.

Table 4.2-11
Intersection Operations
Opening Year Conditions and Opening Year Conditions With-Project

ID No.	Intersection	Opening Year Conditions				Opening Year Conditions With-Project				With-Project Change in Delay (secs.)		Jurisdiction/ Deficiency Criteria	Deficiency Criteria Exceeded?
		Midday		PM		Midday		PM					
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Midday	PM		
1	Civic Drive and Home Depot South Dwy./ (Project Site Dwy. No.1)	15.2	C	15.4	C	15.5	C	15.7	C	0.3	0.3	Victorville/ Increase in LOS to "E" or greater.	No
2	Civic Drive and Home Depot North Dwy./ (Project Site Dwy. No.2)	**58.4**	**F**	**44.7**	**E**	**57.4**	**F**	**48.5**	**E**	-1.0	**3.8**	Victorville/ Increase in delay of 2% or greater.	**YES**
3	Civic Drive and Roy Rogers Drive	16.7	B	17.3	B	16.8	B	17.5	B	0.1	0.2	Victorville/ Increase in LOS to "E" of greater.	No
4	Roy Rogers Drive and I-15 Southbound Ramps	11.9	B	15.3	B	12.1	B	15.4	B	0.2	0.1	Caltrans/ Increase in LOS to "E" or greater.	No
5	Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive	50.9	D	**58.3**	**E**	52.2	D	**58.9**	**E**	1.3	**0.6**	Caltrans/ Contribute traffic to an existing LOS deficiency.	**YES**

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: TWSC = Two-Way Stop Control; OWSC = One-Way Stop Control; Delay expressed in seconds; Deficiencies are indicated by **bold** text.

Roadway Segment LOS Analysis

Roadway segments operational conditions under Opening Year Without-Project and Opening Year With-Project Conditions are indicated at Table 4.2-12 together with applicable jurisdictional LOS standards. As indicated, all Study Area roadway segments

would operate at acceptable LOS under Opening Year and Opening Year With-Project Conditions.

Table 4.2-12
Roadway Segment Operations
Opening Year Conditions and Opening Year Conditions With-Project

Roadway	Segment Limits	Classification (No. Lanes)	LOS D Capacity ADT	Opening Year			Opening Year With-Project			With-Project Δ V/C	Jurisdiction/ LOS Std.
				ADT	V/C	LOS	ADT	V/C	LOS		
Civic Drive	Seneca Drive to Project Dwy. No .1	Arterial-Divided (4)	33,800	8,630	0.255	A	8,661	0.256	A	0.001	Victorville/ LOS D
	Project Dwy. No. 1 to Project Dwy. No. 2	Arterial-Divided (4)	33,800	8,690	0.257	A	8,741	0.259	A	0.002	Victorville/ LOS D
	Project Dwy. No. 2 to Roy Rogers Drive	Arterial-Divided (4)	33,800	11,960	0.354	A	12,134	0.359	A	0.005	Victorville/ LOS D
Roy Rogers Drive	Amargosa Road to Civic Drive	Super Arterial (5)	42,170	20,900	0.496	A	20,921	0.496	A	0.000	Victorville/ LOS D
	Civic Drive to I-15 SB Ramps	Super Arterial (5)	42,170	30,660	0.727	B	30,814	0.731	B	0.004	Victorville/ LOS D
	I-15 SB Ramps to I-15 NB Ramps	Arterial-Divided (4)	33,800	27,570	0.816	C	27,673	0.819	C	0.003	Victorville/ LOS D
	East of I-15 NB Ramps	Arterial-Divided (4)	33,800	24,590	0.728	B	24,611	0.728	B	0.001*	Victorville/ LOS D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: *Does not total due to rounding.

HORIZON YEAR (2031) TRAFFIC ANALYSIS

Horizon Year traffic volumes and levels of service reflect anticipated conditions in the year 2031. Per the TIA Scoping Agreement, traffic projections for Horizon Year Conditions assume an annual growth rate of 2% per year applied to the Opening Year (2021) Without Project traffic volumes. In the following analysis of Horizon Year With-Project Conditions, the following subtopics are discussed:

- Intersection LOS Analysis; and
- Roadway Segment LOS Analysis.

Intersection LOS Analysis

Intersection operations under Horizon Year Without-Project and Horizon Year With-Project Conditions are summarized at Table 4.2-13. As indicated, under Horizon Year

With-Project Conditions, Project traffic would result in increased intersection delays that would exceed applicable deficiency criteria at Study Area Intersections No. 2 and No. 5.

Table 4.2-13
Intersection Operations
Horizon Year Conditions and Horizon Year Conditions With-Project

ID No.	Intersection	Horizon Year Conditions				Horizon Year Conditions With-Project				With-Project Change in Delay (secs.)		Jurisdiction/ Deficiency Criteria	Deficiency Criteria Exceeded?
		Midday		PM		Midday		PM					
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Midday	PM		
1	Civic Drive and Home Depot South Dwy./ (Project Site Dwy. No.1)	18.4	C	16.1	C	18.7	C	16.3	C	0.3	0.2	Victorville/ Increase in LOS to "E" or greater.	No
2	Civic Drive and Home Depot North Dwy./ (Project Site Dwy. No.2)	**126.2**	**F**	**59.9**	**F**	**130.9**	**F**	**69.0**	**F**	**4.7**	**9.1**	Victorville/ Increase in delay of 2% or greater.	**YES**
3	Civic Drive and Roy Rogers Drive	20.3	C	22.3	C	20.6	C	22.7	C	0.3	0.4	Victorville/ Increase in LOS to "E" of greater.	No
4	Roy Rogers Drive and I-15 Southbound Ramps	15.5	B	21.3	C	15.6	B	21.6	C	0.1	0.3	Caltrans/ Increase in LOS to "E" or greater.	No
5	Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive	**96.6**	**F**	**102.0**	**F**	**97.6**	**F**	**103.1**	**F**	**1.0**	**1.1**	Caltrans/ Contribute traffic to an existing LOS deficiency.	**YES**

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: TWSC = Two-Way Stop Control; OWSC = One-Way Stop Control; Delay expressed in seconds; Deficiencies are indicated by **bold** text.

Roadway Segment LOS Analysis

Roadway segment operational conditions under Horizon Year and Horizon Year With-Project Conditions are indicated at Table 4.2-14 together with applicable jurisdictional LOS standards. As indicated, all Study Area segments would operate at acceptable LOS under Horizon Year and Horizon Year With-Project Conditions.

Table 4.2-14
Roadway Segment Operations
Horizon Year Conditions and Horizon Year Conditions With-Project

Roadway	Segment Limits	Classification (No. Lanes)	LOS D Capacity ADT	Horizon Year			Horizon Year With-Project			With-Project Δ V/C	Jurisdiction/ LOS Std.
				ADT	V/C	LOS	ADT	V/C	LOS		
Civic Drive	Seneca Drive to Project Dwy. No .1	Arterial-Divided (4)	33,800	10,360	0.307	A	10,391	0.307	A	0.001*	Victorville/ LOS D
	Project Dwy. No. 1 to Project Dwy. No. 2	Arterial-Divided (4)	33,800	10,420	0.308	A	10,471	0.310	A	0.002	Victorville/ LOS D
	Project Dwy. No. 2 to Roy Rogers Drive	Arterial-Divided (4)	33,800	14,360	0.425	A	14,534	0.430	A	0.005	Victorville/ LOS D
Roy Rogers Drive	Amargosa Road to Civic Drive	Super Arterial (6)	50,600	24,790	0.490	A	24,811	0.490	A	0.000	Victorville/ LOS D
	Civic Drive to I-15 SB Ramps	Super Arterial (6)	50,600	36,790	0.727	B	36,944	0.730	B	0.003	Victorville/ LOS D
	I-15 SB Ramps to I-15 NB Ramps	Super Arterial (5)	42,170	33,070	0.784	C	33,173	0.787	C	0.002*	Victorville/ LOS D
	East of I-15 NB Ramps	Super Arterial (5)	42,170	29,520	0.700	B	29,541	0.701	B	0.000*	Victorville/ LOS D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: *Does not total due to rounding.

HORIZON YEAR (2031) VACANT PARCEL DEVELOPMENT SCENARIO

As requested by the City, a focused Horizon Year (2031) operational analysis was prepared that assumes certain development of currently vacant parcels (pads) located adjacent to the Project site. Traffic generated by assumed development of the considered adjacent pads was added to the Horizon Year 2031 Traffic Condition. Assumed pad development includes:

- Pad 1
  - 3,000-square-foot Shopping Center
  - 3,000-square-foot Fast-Food Restaurant with Drive-Through
- Pad 4
  - 2,000-square-foot Shopping Center
  - 2,000-square-foot Fast-Food Restaurant with Drive-Through
- Pad 5
  - 8,650-square-foot High-Turnover Restaurant

Under the Horizon Year Vacant Parcel Development Scenario, the following subtopics are discussed:

- Intersection LOS Analysis;
- Queuing Analysis; and
- Roadway Segment LOS Analysis.

Per direction from the City, only Study Area Intersections No. 1 and No. 2 were evaluated as part of the Horizon Year Vacant Parcel Development Scenario.

Intersection LOS Analysis

Intersection operations under the Horizon Year Vacant Parcel Development Scenario Without-Project and the Horizon Year Vacant Parcel Development Scenario With-Project Conditions are summarized at Table 4.2-15. As indicated, under the Horizon Year Vacant Parcel Development Scenario With-Project Conditions, Project traffic would result in increased intersection delays that would exceed applicable deficiency criteria at Study Area Intersection No. 2.

Table 4.2-15
Intersection Operations
Horizon Year Vacant Parcel Development Scenario and
Horizon Year Vacant Parcel Development Scenario With-Project

ID No.	Intersection	Horizon Year Vacant Parcel Development Scenario				Horizon Year Vacant Parcel Development Scenario With-Project				With-Project Change in Delay (secs.)		Jurisdiction/ Deficiency Criteria	Deficiency Criteria Exceeded?
		Midday		PM		Midday		PM					
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Midday	PM		
1	Civic Drive and Home Depot South Dwy./ (Project Site Dwy. No.1)	33.9	D	25.3	D	34.4	D	25.5	D	0.5	0.2	Victorville/ Increase in LOS to "E" or greater.	No
2	Civic Drive and Home Depot North Dwy./ (Project Site Dwy. No.2)	**439.3**	**F**	**206.6**	**F**	**514.4**	**F**	**242.1**	**F**	**75.1**	**35.5**	Victorville/ Increase in delay of 2% or greater.	**YES**

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: TWSC = Two-Way Stop Control; OWSC = One-Way Stop Control; Delay expressed in seconds; Deficiencies are indicated by **bold** text.

Queuing Analysis

As requested by the City, a queuing analysis at Study Area Intersections No. 1 and No. 2 was conducted for the Horizon Year Vacant Parcel Development Scenario. The analysis determined that queue lengths would be adequate with the exception of the Midday Peak condition, under which westbound traffic is projected to extend beyond the available space at Intersection No. 2. However, this queue would exist on the development property, not along Civic Drive and would not result in or cause deficient conditions. It is recommended that future developers coordinate final site designs to reduce potential queuing lengths within the affected development area.

Roadway Segment LOS Analysis

Roadway segment operational conditions under the Horizon Year Vacant Parcel Development Scenario and the Horizon Year Vacant Parcel Development Scenario With-Project are indicated at Table 4.2-16 together with applicable jurisdictional LOS standards. As indicated, all Study Area segments would operate at acceptable LOS under the Horizon Year Vacant Parcel Development Scenario and the Horizon Year Vacant Parcel Development Scenario With-Project.

Table 4.2-16
Roadway Segment Operations
Horizon Year Vacant Parcel Development Scenario and
Horizon Year Vacant Parcel Development Scenario With-Project

Roadway	Segment Limits	Classification (No. Lanes)	LOS D Capacity ADT	Horizon Year Vacant Parcel Development Scenario			Horizon Year Vacant Parcel Development Scenario With-Project			With-Project Δ V/C	Jurisdiction/ LOS Std.
				ADT	V/C	LOS	ADT	V/C	LOS		
Civic Drive	Seneca Drive to Project Dwy. No .1	Arterial-Divided (4)	33,800	10,710	0.317	A	10,741	0.318	A	0.001	Victorville/ LOS D
	Project Dwy. No. 1 to Project Dwy. No. 2	Arterial-Divided (4)	33,800	11,180	0.331	A	11,231	0.332	A	0.002*	Victorville/ LOS D
	Project Dwy. No. 2 to Roy Rogers Drive	Arterial-Divided (4)	33,800	16,590	0.491	A	16,764	0.496	A	0.005	Victorville/ LOS D
Roy Rogers Drive	Amargosa Road to Civic Drive	Super Arterial (6)	50,600	25,340	0.501	A	25,361	0.501	A	0.000	Victorville/ LOS D
	Civic Drive to I-15 SB Ramps	Super Arterial (6)	50,600	38,740	0.766	B	38,894	0.769	B	0.003	Victorville/ LOS D
	I-15 SB Ramps to I-15 NB Ramps	Super Arterial (5)	42,170	34,200	0.811	C	34,303	0.813	C	0.002	Victorville/ LOS D
	East of I-15 NB Ramps	Super Arterial (5)	42,170	29,790	0.706	B	29,811	0.707	B	0.000*	Victorville/ LOS D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: * Does not total due to rounding.

CONGESTION MANAGEMENT PLAN CONSIDERATIONS

The San Bernardino County Congestion Management Program (CMP) definition of deficiency is based on maintaining a level of service standard of LOS E or better, except where an existing LOS F condition is identified in the CMP document. Within this analysis, LOS D has nonetheless been conservatively applied as the minimum acceptable operational condition for Study Area CMP facilities.

CMP Intersections

LOS D is the minimum required LOS to be maintained on the Study Area CMP intersections. As presented herein, Study Area Intersection No. 5: Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive would operate at deficient LOS conditions (LOS E, LOS F). This is coincident with the LOS deficiency identified at Study Area Intersection No. 5 generally.

RECOMMENDED CONDITIONS OF APPROVAL

Recommended Conditions of Approval and related improvements to address the above-noted Study Area LOS deficiencies are presented below.

General

The Project would pay all requisite traffic impact fees per City of Victorville and County of San Bernardino Ordinance requirements. Fees required by Ordinance are assumed to be timely collected and applied by the Lead Agency. Collected fees would be assigned to recommended improvements per Lead Agency requirements.

Intersection No. 2

The deficient with-Project LOS conditions at Study Area Intersection No. 2 are attributed to the side street vehicle delays, particularly the eastbound and westbound left turns and through movements. The major street at this intersection (Civic Drive) generally experiences LOS B or better.

Although signalization of Study Area Intersection No. 2 could achieve adequate LOS, the City has determined that there would be insufficient spacing between a proposed signal

at Study Area Intersection No. 2 and the existing signal at Civic Drive/Roy Rogers Drive. As an alternative solution, potential signalization of Study Area Intersection No. 1 was considered. The TIA concluded that signalization of Study Area Intersection No. 1 would shift traffic volumes within the Study Area and thereby resolve intersection LOS deficiencies occurring at Study Area Intersection No. 2. However, signalization of Study Area Intersection No. 1 would not be warranted until sometime after the Project Opening Year Conditions and prior to Horizon Year Conditions.

Signalization of an intersection prior to warrant(s) satisfaction could result in unintended adverse impacts such as an increase in vehicle delay for all movements or an increase in traffic violations at the intersection. For this reason, it is recommended that a signal at Intersection No. 1 not be installed until such time the City determines that applicable signal warrants have been met.

Intersection No. 5

The recommended improvement at Intersection No. 5 involves the retiming of the traffic signals in order to accommodate Project traffic. The retiming recommendation does not include modifications to the cycle length, but rather minor changes to the cycle splits. The Synchro analysis conducted for this intersection shows that shifting one second of green time from the Northbound approach to the Eastbound approach for the With-Project conditions is projected to reduce the projected average delay to values equal to or less than the Without Project conditions.

Reflecting the above considerations, and to address Study Area LOS deficiencies, the following Conditions of Approval are recommended:

4.2.1 Prior to issuance of the first development permit, the Applicant shall pay fair share fees toward the installation of a future traffic signal at the intersection of Project Driveway No. 1 at Civic Drive (Study Area Intersection No. 1).

4.2.2 Subsequent to Project Opening, the City will require development project applicants for the vacant properties east of Civic Drive, south of Roy Rogers Drive to evaluate Study Area Intersections No. 1 and No. 2. Said traffic studies are to include traffic signal warrants.

4.2.3 Subsequent to Project Opening, the City will require development project applicants for the vacant properties east of Civic Drive, south of Roy Rogers Drive, to evaluate Study Area Intersection No. 5 (Roy Rogers Drive and I-15 Northbound Ramps/La Paz Drive) to determine how timing of the existing signal at this location can be adjusted in order to maintain adequate LOS. Said studies will be submitted to Caltrans for their review.

LOS Conditions reflecting implementation of Conditions of Approval 4.2.1, 4.2.2, and 4.2.3 are summarized at Tables 4.2-17, 4.2-18, 4.2-19.

Table 4.2-17
Summary of Opening Year With-Project Intersection Conditions
With Implemented Conditions of Approval

Study Area Intersection	Without Project		With-Project		With-Project With Implemented Conditions of Approval	
	MIDDAY	PM	MIDDAY	PM	MIDDAY	PM
	Delay – LOS	Delay – LOS	Delay – LOS	Delay – LOS	Delay – LOS	Delay – LOS
Civic Drive / Project Site Driveway #1	18.4	C	16.1	C	9.9 – A*	11.1 – B*
Civic Drive / Project Site Driveway #2	**58.4 - F**	**44.7 - E**	**57.4 - F**	**48.5 - E**	31.2 – D*	24.1 – C*
Roy Rogers Drive and I-15 Northbound Ramps/ La Paz Drive	50.9 - D	**58.3 - E**	52.2 - D	**58.9 - E**	52.1 - D	**57.2 - E**

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: Delay expressed in seconds; Deficiencies are indicated by **bold** text. * Signalization of Study Area Intersection No. 1 not recommended until subsequent to Project Opening Year Conditions; reflects mitigated Horizon Year Conditions.

Table 4.2-18
Summary of Horizon Year With-Project Intersection Conditions
With Implemented Conditions of Approval

Study Area Intersection	Without Project		With-Project		With-Project With Implemented Conditions of Approval	
	Midday	PM	Midday	PM	Midday	PM
	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS
Civic Drive /	18.4	C	16.1	C	9.9 – A	11.1 – B

Table 4.2-18
Summary of Horizon Year With-Project Intersection Conditions
With Implemented Conditions of Approval

Study Area Intersection	Without Project		With-Project		With-Project With Implemented Conditions of Approval	
	Midday	PM	Midday	PM	Midday	PM
	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS
Project Site Driveway #1						
Civic Drive / Project Site Driveway #2	**126.2 – F**	**59.9 – F**	**130.9 – F**	**69.0 – F**	31.2 – D	24.1 – C
Roy Rogers Drive and I-15 Northbound Ramps/ La Paz Drive	**96.6 – F**	**102.0 – F**	**97.6 – F**	**103.1 – F**	**95.0 – F**	**100.6 – F**

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: Delay expressed in seconds; Deficiencies are indicated by **bold** text.

Table 4.2-19
Summary of Horizon Year Vacant Parcel Development Scenario With-Project
With Implemented Conditions of Approval

Study Area Intersection	Without Project		With-Project		With-Project With Implemented Conditions of Approval	
	Midday	PM	Midday	PM	Midday	PM
	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS	Delay - LOS
Civic Drive / Project Site Driveway #1	33.9	D	25.3	D	12.4– B	13.1 – B
Civic Drive / Project Site Driveway #2	**439.3 – F**	**206.6 – F**	**514.4 – F**	**242.1– F**	**41.9 – E**	30.3 – D

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.
Notes: Delay expressed in seconds; Deficiencies are indicated by **bold** text.

OTHER TRANSPORTATION TOPICS

Other transportation topics evaluated below include the following:

- Potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

- Potential to substantially increase hazards to a geometric design feature; or result in inadequate emergency access.

Potential Impact: *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.*

Impact Analysis: The analysis presented here considers the degree to which the Project may hinder the safe and comfortable access to the Project site from other locations, with a special focus on people relying on transit services or active transportation modes such as biking or walking. The metric of auto-vehicle delay (LOS) is not considered as this may conflict with the City's goal to reduce auto-vehicle miles traveled.

City of Victorville programs, plans, and policies addressing the circulation system are established under the City of Victorville General Plan (General Plan), and the Civic Center Community Specific Plan (Specific Plan). Project consistency with applicable provisions of the General Plan and Specific Plan is summarized at Table 4.2-20. As provided for under CEQA, the analysis presented here considers program, plan, and policy inconsistencies that could result in potentially significant environmental impacts. Consistent with *CEQA Guidelines* Section 15064.3, policies addressing or considering the metric of auto-vehicle delay (LOS) and LOS deficiencies are not environmental concerns as defined under CEQA. As a matter of law, the Project would be required to comply with all Ordinances addressing the Study Area circulation system.

Table 4.2-20
General Plan and Specific Plan Policy Consistency Analysis

GENERAL PLAN POLICIES		
Policy		**Remarks**
1.1.1	*Maintain LOS "D" or better at intersections (as defined in the most current version of the Highway Capacity Manual), except in certain high activity areas designated by the Planning Commission, where a LOS E is acceptable*	**Consistent.** Per *CEQA Guidelines Section 15064.3,* vehicle delay (LOS) does not constitute a significant environmental impact. The Project would comply with City Conditions of Approval addressing LOS.
1.1.2	*If a development project would worsen an intersection peak hour LOS to E or worse, it is considered a significant impact that must be mitigated. If a development project would worsen an already deficient intersection by two percent or more, it is considered a significant impact that must be mitigated.*	**Consistent.** The Project would comply with City Conditions of Approval addressing LOS. Under CEQA, LOS deficiencies are not significant environmental impacts. Please refer also to remarks at Policy 1.1.1
1.1.3	*Require new development and redevelopment projects to bear responsibility for traffic system improvements necessary to mitigate the project's significant impacts at affected intersections, concurrently with construction of such projects.*	**Consistent.** The Project would pay requisite fees and would implement required improvements pursuant to the City Conditions of Approval. Under CEQA, LOS deficiencies are not significant environmental impacts. Please refer also to remarks at Policy 1.1.1.

Table 4.2-20
General Plan and Specific Plan Policy Consistency Analysis

GENERAL PLAN POLICIES		
1.2.1	*Support and cooperate with all aspects of the countywide CMP for maintaining levels of service for CMP segments located in the Planning Area.*	**Consistent:** Project-related LOS deficiencies at CMP facilities are addressed through City Conditions of Approval. Under CEQA, LOS deficiencies are not significant environmental impacts. Please refer also to remarks at Policy 1.1.1.
2.2.1	*Require new development and redevelopment projects (public and private), to incorporate needed public transit facilities as identified by the Victor Valley Transit Authority (VVTA).*	**Consistent:** Developers of the Project would coordinate transit service options and provision of transit facilities with the local mass transit provider (VVTA). Adequate area for any bus turnouts and bus amenities would be provided consistent with City and VVTA requirements.
3.1.1	*Planning and design of new roadways and expansion/completion of existing roadways shall include consideration of water, sewer, storm drainage, communications, and energy facilities that can be co-located within the road right of way.*	**Consistent:** Developers of the Project would design construct all Project roadway improvements and infrastructure improvements consistent with City and purveyor requirements. Collocation and concurrent implementation of improvements will be achieved to the extent practical.
3.3.1	*Require private and public development projects to be responsible for constructing road improvements along all frontages abutting a public street right of way, in accordance with the design specifications for that roadway. Such road frontage improvements shall be constructed concurrently with and completed prior to opening of the project.*	**Consistent:** Developers of the Project would construct road improvements along all frontages abutting a public street right of way consistent with City requirements and in accordance with the design specifications for that roadway. As required by the City, frontage improvements shall be completed prior to Project opening.
SPECIFIC PLAN POLICIES		
Policies		**Remarks**
5.1.2	*Design non-vehicular pathways with intermittent breaks at connecting transit locations.*	**Consistent.** Frontage and interior pedestrian pathways implemented by the Project have been designed to provide convenient user entry and exit. Interior pathways are connected to the building entry. Transit facility improvements do not currently exist at the Project site. Under future conditions, pedestrian connection to transit improvements would be coordinated with the City and VVTA if/as required.
5.2.2	*Build upon and create new connections for a variety of transportation types.*	**Consistent.** The Project would construct walkways providing connection to existing and planned pedestrian paths. Developers of the Project would coordinate transit service options and provision of transit facilities with the local mass transit provider (VVTA). Adequate area for any bus turnouts and bus amenities would be provided consistent with City and VVTA requirements.
5.2.4	*Examine existing connections and intersections, identifying those that require attention and possible redesign.*	The Project TIA evaluates the Study Area roadway network consistent with City requirements. Conditions of Approval as implemented by the City and Applicant address identified LOS deficiencies. The Project developers would construct required frontage improvements per city requirements. crossings should be added as needed. Please refer also to Remarks at General Plan Policies 1.1.1, 3.3.1.
5.6.2	Incorporate bike lanes into roadway designs.	Civic Drive adjacent to the Project site is a designated Specific Plan Bike Route. The Project would implement Bike Route improvements that may be required by the City.
5.7.5	Parking facilities location.	*Parking areas proposed by the Project are removed from, and screened from adjacent Civic Drive. Locations and designs of Project parking areas do not impede or dictate pedestrian or non-motorized access to the Project site.*

Sources: Policy statements from the City of Victorville General Plan and Civic Center Community Specific Plan. Remarks by Applied Planning, Inc.

Prior to the issuance of Building Permits, the City would review the final Project designs to ensure consistency with General Plan and Specific Plan circulation system programs, plans and policies. Compliance with applicable Ordinance requirements is required as a matter of law. The Project does not propose facilities or activities that would otherwise potentially conflict with City circulation system programs, plans, policies and ordinances.

Based on the preceding, the potential for the Project to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities is less-than-significant.

Potential Impact: *Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access.*

Impact Analysis: To ensure appropriate design and implementation of all Project circulation improvements, the final design of the Project site plan, to include locations and design of proposed driveways, shall be reviewed and approved by the City Traffic Engineer. In addition, representatives of the Sheriff's Department and Fire Department would review the Project's plans to ensure that emergency access is provided consistent with Department(s) requirements. Efficient and safe access within, and access to, the Project is provided by the site plan design concept, site access improvements, and site adjacent roadway improvements included as components of the Project. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the Project site. Sight distance at each project access point would be reviewed to ensure conformance with City sight distance standards at the time of preparation of final grading, landscape and street improvement plans. Based on the preceding, the implemented Project would not substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access.

It is also recognized that temporary and short-term traffic detours and traffic disruption could result during Project construction activities. Management and control of construction traffic would be addressed through the preparation of a construction area traffic management plan to be submitted to the City prior to or concurrent with Project building plan review(s). The Project Construction Traffic Management Plan (Plan), also summarized within the RDEIR Project Description, would identify traffic controls for any street closures, detours, or other potential disruptions to traffic circulation during Project construction. The Plan would also be required to identify construction vehicle access routes, and hours of construction traffic. Please refer also to RDEIR Section 3.0, *Project Description*, 3.5.14 *Construction Traffic Management Plan.*

As supported by the preceding discussions and information presented in the RDEIR Project Description, the potential for the Project to substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access is considered less-than-significant.

Level of Significance: Less-Than-Significant.

4.3 AIR QUALITY

4.3 AIR QUALITY

Abstract

This Section identifies and addresses potential air quality impacts that may result from construction and implementation of the Project. More specifically, the air quality analysis evaluates the potential for the Project to result in the following impacts:

- *Conflict with or obstruct implementation of the applicable air quality plan;*
- *Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard; or*
- *Expose sensitive receptors to substantial pollutant concentrations.*

Additionally, as substantiated in the Initial Study (RDEIR Appendix A), the Project's potential impacts under the following topic were previously determined to be less-than-significant and are not further discussed here:

- *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

As discussed within this Section, all potential air quality impacts of the Project are considered less-than-significant.

4.3.1 INTRODUCTION

This Section presents existing air quality conditions and identifies potential air quality impacts resulting from construction and operation of the Project. Local and regional climate, meteorology and air quality are discussed, as well as existing federal, state and regional air quality regulations. The information presented in this Section is summarized from *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018 (Project AQIA). The Project AQIA, including all supporting air quality modeling data, is presented in its entirety at RDEIR Appendix C.

4.3.2 AIR QUALITY FUNDAMENTALS

Air pollution comprises many substances generated from a variety of sources, both man-made and natural. Industrialization occurring in the twentieth century, and especially activities relying on the burning of fossil fuels, creates air pollution. Most air pollutant contaminants are wasted energy in the form of unburned fuels or by-products of the combustion process. Motor vehicles are by far the most significant source of air pollutants in urban areas, emitting photochemically reactive hydrocarbons (unburned fuel), carbon monoxide, and oxides of nitrogen. These primary pollutants chemically react in the atmosphere with sunlight and the passage of time to form secondary pollutants such as ozone.

Although substantive air quality improvements have been made in California over the past twenty years, Southern California still experiences severe air pollution problems. As discussed in greater detail in the following paragraphs, oxidants and suspended particulates represent the major air quality problems within the Mojave Desert Air Basin (MDAB).

Air pollutants are generally classified as either primary or secondary pollutants. Primary pollutants are generated daily and emitted directly from the source, whereas secondary pollutants are created over time and occur within the atmosphere as chemical and photochemical reactions take place. Examples of primary pollutants include carbon monoxide (CO), oxides of nitrogen (NO_2 and NO), sulfur dioxide (SO_2), particulate matter (PM_{10} and $PM_{2.5}$), and various hydrocarbons or reactive organic gases (ROG). Examples

of secondary pollutants include ozone (O_3), which is a product of the reaction between NO_x and ROG in the presence of sunlight. Other secondary pollutants include photochemical aerosols.

To aid in the review of discussions presented subsequently in this Section, recurring terms, abbreviations, and acronyms are defined as follows: PPM - Parts per Million; $\mu g/m^3$ - Micrograms Per Cubic Meter; PM_{10} - Particulate Matter Less Than 10 Microns In Diameter; $PM_{2.5}$ - Particulate Matter Less Than 2.5 Microns In Diameter.

4.3.2.1 Criteria Air Pollutants

Criteria air pollutants are those air contaminants for which air quality standards currently exist. Currently, state and federal air quality standards exist for ozone, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), carbon monoxide (CO), suspended particulate matter (PM_{10} and $PM_{2.5}$), and lead. California has also set standards for visibility, sulfates, hydrogen sulfide, and vinyl chloride. Evaluated criteria air contaminants, or their precursors, typically also include reactive organic gases (ROG), oxides of nitrogen (NO_x), sulfur oxides (SO_x), and respirable particulate matter (PM_{10}, $PM_{2.5}$). Pollutant characteristics, mechanisms of pollutant origination and potential health effects of air pollutants are described below.

Carbon Monoxide

Properties and Sources

Carbon monoxide (CO) is a colorless, odorless, toxic gas formed by incomplete combustion of fossil fuels. CO levels tend to be highest during the winter mornings, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest CO concentrations are generally found near congested transportation corridors and intersections. Other sources include aircraft, off-road vehicles, stationary equipment (e.g., fuel-fired furnaces, gas water heaters, fireplaces, gas stoves, gas dryers, charcoal grills), and landscape maintenance equipment such as lawnmowers and leaf blowers.

Human Health Effects

A consistent association between increased ambient CO levels and higher-than-average rates of hospital admissions for heart diseases (such as congestive heart failure) has been observed. Carbon monoxide can cause decreased exercise capacity, and adversely affects conditions with an increased demand for oxygen supply (fetal development, chronic hypoxemia, anemia, and diseases involving the heart and blood vessels). Exposure to CO can cause impairment of time interval estimation and visual function.

Ozone

Properties and Sources

Ozone (O_3) is a highly reactive and unstable gas that is formed when volatile organic compounds (VOC) and oxides of nitrogen (NO_x), which are both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of the pollutant.

Human Health Effects

Short-term exposure to ozone can cause a decline in pulmonary function in healthy individuals including breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue and immunological changes. Additionally, an increase in the frequency of asthma attacks, cough, chest discomfort and headache can result.

A correlation has been reported between elevated ambient ozone levels and increases in daily hospital admission rates and mortality because of long-term ozone exposure. A risk to public health implied by altered connective tissue metabolism and host defense in animals has also been reported.

Oxides of Nitrogen

Properties and Sources

Oxides of nitrogen (NO_x) are integral to the process of photochemical smog production. During combustion, oxygen reacts with nitrogen to produce NO_x. Two major forms of NO_x are nitric oxide (NO) and nitrogen dioxide (NO_2). Natural causal sources or originators of NO_x include lightning, soils, wildfires, stratospheric intrusion, and the oceans. Natural sources accounted for approximately seven percent of 1990 emissions of NO_x for the United States (EPA 1997). Atmospheric deposition of NO_x occurs when atmospheric or airborne nitrogen is transferred to water, vegetation, soil, or other materials. Acid deposition involves the deposition of nitrogen and/or sulfur acidic compounds that can harm natural resources and materials. The major source of NO_x in the Basin is on-road vehicles. Stationary commercial and service source fuel combustion are other contributors.

Human Health Effects

Exposure to NO_x may alter sensory responses or impair pulmonary function and may increase incidence of acute respiratory disease including infections and respiratory symptoms in children. Difficulty in breathing in healthy individuals as well as bronchitic groups may also occur. NO_x is also a precursor to ozone and PM_{10}/$PM_{2.5}$. As noted above, health effects of ground-level ozone include: aggravated asthma; reduced lung capacity; increased respiratory illness susceptibility; increased respiratory and cardiovascular hospitalizations; and premature deaths.

Sulfur Dioxide

Properties and Sources

Sulfur dioxide (SO_2) is a colorless, pungent gas. At levels greater than 0.5 ppm, SO_2 has a strong odor. Sulfuric acid is formed from sulfur dioxide, which is an aerosol particle component that affects acid deposition. Anthropogenic, or human-caused, sources include fossil-fuel combustion, mineral ore processing, and chemical manufacturing.

Volcanic emissions are a natural source of sulfur dioxide. SO_2 is a precursor to sulfates and PM_{10}.

Human Health Effects

Health effects of SO_2 include higher frequencies of acute respiratory symptoms (including airway constriction in some asthmatics and reduction in breathing capacity leading to severe difficulties) and diminished ventilatory function in children. Extreme exposure can cause lung edema (fluid accumulation), lung tissue damage, and damage to lining the respiratory tract.

Particulate Matter

Properties and Sources

Particulate matter is a generic term that defines a broad group of chemically and physically different particles (either liquid droplets or solids) that can exist over a wide range of sizes. Examples of atmospheric particles include those produced from combustion (diesel soot or fly ash), light (urban haze), sea spray (salt particles), and soil-like particles from re-suspended dust. Fugitive dust is defined as any solid particulate matter that becomes airborne, other than that emitted from an exhaust stack, directly or indirectly because of human activities (Rule 403, Fugitive Dust, SCAQMD).

Within air quality analyses, particulate matter is categorized by diameter: PM_{10} and $PM_{2.5}$. PM_{10} refers to particulate matter that is 10 microns or less in diameter (1 micron is one millionth of a meter, or one micrometer [μm]). $PM_{2.5}$ refers to particulate matter that is 2.5 microns or less in diameter. The size of particles can determine the residence time of the material in the atmosphere. $PM_{2.5}$ has a longer atmospheric lifetime than PM_{10} and, therefore, can be transported over longer distances.

Particulate matter originates from a variety of stationary and mobile sources. Stationary sources that generate particulate matter include: fuel combustion for electric utilities, residential space heating, and industrial processes; construction and demolition; metals, minerals, and petrochemicals; wood products processing; mills and elevators used in

agriculture; erosion from tilled lands; waste disposal and recycling. Mobile or transportation-related sources that generate particulate matter include highway vehicles, non-road vehicles and fugitive dust from paved and unpaved roads.

Human Health Effects

A consistent correlation between elevated ambient PM_{10} levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed.[1]

Diesel Particulate Matter (DPM), a subcategory of particulate matter, is a mixture of many exhaust particles and gases that is produced when an engine burns diesel fuel. Many compounds found in diesel exhaust are carcinogenic, including sixteen compounds that are classified as possibly carcinogenic by the International Agency for Research on Cancer. DPM includes the particle-phase constituents in diesel exhaust. Some short-term (acute) effects of diesel exhaust include eye, nose, throat and lung irritation, as well as coughs, headaches, light-headedness and nausea. Diesel exhaust is a major source of ambient particulate matter pollution, and numerous studies have linked elevated particle levels in the air to increased hospital admission, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. DPM in the Basin poses the greatest cancer risk of all identified toxic air pollutants.

Reactive Organic Gases

Properties and Sources

Reactive Organic Gases (ROGs) (also termed Volatile Organic Compounds [VOCs]) are defined as any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. It should be noted that there is no state or national ambient air quality standard for ROGs because they are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions

[1] www.aqmd.gov/docs/default-source/planning/air-quality-guidance/appendix-c.pdf

reduces certain chemical reactions that contribute to the formulation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility. The major sources of ROGs in the Basin are on-road motor vehicles and solvent evaporation. ROGs are also an ozone and PM_{10}/$PM_{2.5}$ precursor.

Human Health Effects

As described previously, health effects of ground-level ozone include: aggravated asthma; reduced lung capacity; increased respiratory illness susceptibility; increased respiratory and cardiovascular hospitalizations; and premature deaths.

Benzene is an ROG and a known carcinogen. Typical sources of benzene emissions include: gasoline service stations (fuel evaporation), motor vehicle exhaust, tobacco smoke, and oil and coal incineration. Benzene is also sometimes employed as a solvent for paints, inks, oils, waxes, plastic, and rubber. It is used in the extraction of oils from seeds and nuts. It is also used in the manufacture of detergents, explosives, dyestuffs, and pharmaceuticals. Short-term (acute) exposure to high doses from inhalation of benzene may cause dizziness, drowsiness, headaches, eye irritation, skin irritation, and respiratory tract irritation, and at higher levels, unconsciousness can occur. Long-term (chronic) occupational exposure to high doses by inhalation has caused blood disorders, including aplastic anemia and lower levels of red blood cells.

4.3.3 SETTING

4.3.3.1 Local and Regional Climate

The Project site is located within the Mojave Desert Air Basin (MDAB), under the jurisdiction of the MDAQMD. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions, and the blocking nature of the Sierra Nevada Mountains located to the north. Air masses pushed onshore in Southern California by differential heating are channeled through the MDAB. The

MDAB is separated from the Southern California coastal and central California valley regions by mountains (highest elevation is approximately 10,000 feet), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, and separated from the San Gabriels by the Cajon Pass (4,200 feet). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Gorgonio Pass (2,300 feet) between the San Bernardino and San Jacinto Mountains.

During the summer, the MDAB is generally influenced by a Pacific subtropical high cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inch of precipitation). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate that at least three months have maximum average temperatures over 100.4° F.

Snow is common above 5,000 feet in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 feet, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding.

4.3.3.2 Existing Air Quality

Existing air quality is monitored and evaluated in the context of National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). These Standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. For further information

regarding NAAQS and CAAQS currently in effect, please refer to the Project Air Quality Impact Analysis, Table 2-1, *Ambient Air Quality Standards*; and http://www.arb.ca.gov/research/aaqs/aaqs.htm. The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards.

Regional Air Quality

The MDAQMD monitors levels of various criteria pollutants at six monitoring stations throughout the air district. No areas of the MDAB exceed the federal or state standards for NO_2, SO_2, CO, sulfates or lead. Attainment designations for the MDAB are provided in Table 4.3-1.

Table 4.3-1
Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1 hour standard	Non-attainment	Non-attainment*
Ozone – 8 hour standard	Non-attainment	Non-attainment*
PM_{10}	Non-attainment*	Non-attainment**
$PM_{2.5}$	Non-attainment	Unclassified/Attainment
Carbon Monoxide	Attainment	Unclassified/Attainment
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment

Source: *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.
* Southwest corner of desert portion of San Bernardino County only.
** San Bernardino County portion only.

Local Air Quality

Relative to the Project site, the nearest long-term air quality monitoring site for Carbon Monoxide (CO), Ozone (O_3), Nitrogen Dioxide (NO_2), Particulate Matter ≤ 10 Microns (PM_{10}), and Ultra-Fine Particulates ($PM_{2.5}$) is the Mojave Desert Air Quality Management District Victorville-Park Avenue monitoring station, located approximately 0.60 miles south of the Project site.

For informational purposes, the most recent three years of available air quality monitoring data is shown in Table 4.3-2. Table 4.3-2 identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality in the Project area. Data for SO_2 has been omitted as attainment is regularly met in the MDAB and few monitoring stations measure SO_2 concentrations.

Table 4.3-2
Ambient Air Quality Conditions

Pollutant	Standard	Year		
		2015	2016	2017
Ozone (O_3)				
Maximum Federal 1-Hour Concentration (ppm)		0.132	0.100	0.088
Maximum Federal 8-Hour Concentration (ppm)		0.105	0.085	0.081
Number of Days Exceeding Federal 1-Hour Standard		1	0	0
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	8	4	0
Number of Days Exceeding Federal 8-Hour Standard	> 0.07 ppm	38	33	17
Number of Days Exceeding State 8-Hour Standard	> 0.07 ppm	39	35	19
Carbon Monoxide (CO)[1]				
Maximum 1-Hour Concentration (ppm)	> 35 ppm	--	--	--
Maximum 8-Hour Concentration (ppm)	> 20 ppm	--	--	--
Nitrogen Dioxide (NO_2)				
Maximum Federal 1-Hour Concentration (ppm)	> 0.100 ppm	0.118	0.097	0.057
Maximum State 1-Hour Concentration (ppm)	> 0.18 ppm	0.118	0.097	0.057
Annual Federal Standard Design Value		11	10	13
Annual State Standard Design Value		14	13	12
Number of Days Exceeding Federal 1-Hour Standard	> 0.18 ppm	1	0	0
Number of Days Exceeding State 1-Hour Standard	> 0.18 ppm	0	0	0
Particulate Matter ≤ 10 Microns (PM_{10})				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	96.1	226.5	182.5
Maximum State 24-Hour Concentration ($\mu g/m^3$)	> 50 $\mu g/m^3$	--	--	--
Annual Federal Arithmetic Mean ($\mu g/m^3$)		25.1	29.3	30.1
Annual State Arithmetic Mean ($\mu g/m^3$)	20 $\mu g/m^3$	--	--	--
Number of Days Exceeding Federal Standard	> 150 $\mu g/m^3$	0	2	1
Number of Days Exceeding State Standard	> 50 $\mu g/m^3$	--	--	--

Table 4.3-2
Ambient Air Quality Conditions

Pollutant	Standard	Year		
		2015	2016	2017
Particulate Matter ≤ 2.5 Microns ($PM_{2.5}$)				
Maximum Federal 24-Hour Concentration (μg/m³)	> 35 μg/m³	50.2	41.5	27.2
Maximum Federal 24-Hour Concentration (μg/m³)		50.2	41.5	29.3
Annual Federal Arithmetic Mean (μg/m³)		--	7.4	8.7
Annual Federal Arithmetic Mean (μg/m³)		--	7.5	8.8
Number of Samples Exceeding Federal 24-Hour Standard	> 35 μg/m³	--	1	0

Source: *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.
-- = data not available from ARB

4.3.4 REGULATORY BACKGROUND

4.3.4.1 Federal Regulations

The U.S. Environmental Protection Agency (EPA) is responsible for setting and enforcing the NAAQS for O_3, CO, NO_x, SO_2, PM_{10}, and lead. The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the California Air Resource Board (CARB).

The Federal Clean Air Act (CAA) was first enacted in 1955, and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures demonstrating how standards would be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim

milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and lead. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$.[2]

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and nitrogen oxides (NO_x). NO_x is a collective term that includes all forms of nitrogen oxides (NO, NO_2, NO_3) which are emitted as byproducts of the combustion process.

4.3.4.2 California Regulations

The CARB, which became part of the California EPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. The California CAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. However, at this time, hydrogen sulfide and vinyl chloride are not measured at any monitoring stations in the MDAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS.

[2] Current NAAQS are identified in the Project Air Quality Impact Analysis. See: Table 2-1, *Ambient Air Quality Standards*, or can be accessed at: http://www.arb.ca.gov/research/aaqs/aaqs.htm.

Local air quality management districts, such as the MDAQMD, regulate air emissions from commercial and light industrial facilities. All air pollution control districts have been formally designated as attainment or nonattainment for each CAAQS.

Serious nonattainment areas are required to prepare air quality management plans that include specified emission reduction strategies to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A District-permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a five percent or more annual reduction in emissions or 15 percent or more in a period of three years for ROGs, NO_x, CO and PM_{10}. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than five percent per year under certain circumstances.

4.3.4.3 Regional Air Quality Management Planning

Currently, the NAAQS and CAAQS are exceeded in most parts of the MDAB. In regards to the NAAQS, the Project region within the MDAB is in nonattainment for ozone (8-hour) and PM_{10}. For the CAAQS, the Project region within the MDAB is in nonattainment

for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$. In response, the MDAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. Further discussion on the AQMPs and Project consistency with the AQMPs is provided subsequently in Section 4.3.6, *Potential Impacts and Mitigation Measures*.

4.3.5 STANDARDS OF SIGNIFICANCE

As identified within the *CEQA Guidelines*, air quality impacts would be considered potentially significant if the Project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.3.5.1 MDAQMD Thresholds

To determine if a given project would cause a significant effect on air quality, the impact of the project must be determined by examining the types and levels of emissions generated and their impacts on factors that affect air quality. To accomplish this determination of significance, the MDAQMD has established air pollution thresholds against which a given project can be evaluated to assist lead agencies in determining if the impacts of a project are significant. If the project's air pollutant emissions exceed applicable MDAQMD thresholds, then the impact should be considered significant. While the final determination of significance thresholds is within the purview of the lead

agency, the MDAQMD recommends that its regional and local air quality thresholds for regulated pollutants (summarized below) be employed by lead agencies in determining whether criteria air pollutant emissions impacts generated by construction or operations of a given project are significant.

Regional Thresholds

MDAQMD regional thresholds are summarized in Table 4.3-3. The *MDAQMD CEQA And Federal Conformity Guidelines* (MDAQMD) August 2016 (MDAQMD Guidelines) indicate that any projects in the MDAB with daily regional emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.3-3
Maximum Daily Emissions Regional Thresholds

Pollutant	Daily Threshold
CO	548 lbs/day
NO_x	137 lbs/day
VOC	137 lbs/day
SO_x	137 lbs/day
PM_{10}	82 lbs/day
$PM_{2.5}$	65 lbs/day

Source: *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.

Carbon Monoxide Concentrations (CO "hot spots") Thresholds

CO "hot spots" are areas of carbon monoxide concentrations exceeding national or state air quality standards. CO hotspots typically occur because of excessive vehicular idling, often associated with traffic backups at underperforming intersections or congested roadway links. A project's localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations:

- 1-hour CO standard of 20.0 parts per million (ppm);
- 8-hour CO standard of 9.0 ppm.

4.3.6 POTENTIAL IMPACTS AND MITIGATION MEASURES

4.3.6.1 Introduction

The following discussions focus on areas where it has been determined that the Project may result in potentially significant air quality impacts, based on the analysis presented within this Section and included within the EIR Initial Study (RDEIR Appendix A). Of the CEQA threshold considerations at Section 4.3.5, and as substantiated in the Initial Study, the Project's potential impacts under the following topics are determined to be less-than-significant, and are not further discussed in this Section:

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Please refer also to Appendix A, Initial Study and NOP Responses; Initial Study Checklist Item III., *Air Quality*.

4.3.6.2 Impact Statements

Following is an analysis of potential air quality impacts that are expected to result from the Project. Potential emissions are considered for Project construction and operation. For each topical discussion, potential impacts are evaluated under applicable criteria established above in Section 4.3.5, *Standards of Significance*.

Potential Impact: *Conflict with or obstruct implementation of the applicable air quality plan.*

Impact Analysis: The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert established under the Western Mojave Desert Air Quality Management Plans (AQMPs) set forth a comprehensive set of programs that will lead the MDAB into compliance with federal and state air quality standards. The control measures and related emission reduction estimates within the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a

future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments.

Accordingly, conformance with these attainment plans is determined by demonstrating compliance with: 1) local land use plans and/or population projections, 2) all MDAQMD Rules and Regulations; and 3) demonstrating that the project will not increase the frequency or severity of a violation in the federal or state ambient air quality standards.

The existing General Plan Land Use designation of the site is Commercial. The Zoning designation for the site is Specific Plan. The site is located within the Civic Center Community Sustainability Specific Plan (Specific Plan).

The used vehicle sales land use and design concepts proposed by the Project are consistent with range of land uses and development types envisioned for the Project site's General Plan Commercial Land Use Designation. The Project does not propose or require amendment of the City General Plan.

Within the Specific Plan, the site has a land use designation of Civic Commercial (CC-2). Land uses and development proposed by the Project are considered to generally conform to commercial land uses and development types that would be permitted or conditionally permitted within the Specific Plan area. It is noted however, that used vehicle sales are not identified as a permitted use or conditionally permitted use within the Project site's CC-2 land use designation. To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally permit used vehicle sales within the CC-2 land use designation.

Regardless of the SPA, the land uses proposed by the Project are considered consistent with the commercial uses anticipated for the site, as well as the growth projections of the City of Victorville General Plan. Based on the preceding discussion, the Project's potential to conflict with or obstruct implementation of the applicable air quality plan is considered less-than-significant.

Level of Significance: Less-Than-Significant.

Potential 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 MDAQMD relies on SCAQMD guidance in evaluation of the significance of cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects. However, related projects could contribute to an existing or projected air quality exceedance because the MDAB is currently a nonattainment area for ozone, PM_{10}, and $PM_{2.5}$.

The SCAQMD published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report, the AQMD clearly states (Page D-3):

> " . . . the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.[3]
>
> . . . Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

[3] The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The Project does not propose or require uses or operations that would generate substantive TACs.

Based on the guidance above, individual projects that do not generate operational or construction emissions that exceed the MDAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the MDAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Conversely, individual project-related construction and operational emissions that exceed MDAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

As previously noted, the Project will not exceed the applicable MDAQMD regional thresholds for construction or operational-source emissions. As such, the Project will not result in a cumulatively significant impact for construction or operational activity.

Level of Significance: Less-Than-Significant.

Potential Impact: *Expose sensitive receptors to substantial pollutant concentrations.*

Impact Analysis: Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors. The nearest sensitive receptor to the Project site is a residential community located approximately 530 feet to the north.

As per the MDAQMD Guidelines, the following project types located within a specified distance to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors:

- 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;
- A gasoline dispensing facility within 300 feet.

[MDAQMD Guidelines, p. 8]

The Project does not include any of the above uses. As such, per MDAQMD criteria, there is no requirement to evaluate the potential for the Project to expose sensitive receptors to substantial pollutant concentrations. Further, the Project does not otherwise propose or require uses or operations that would generate substantive pollutant concentrations that would potentially affect sensitive receptors; nor are there any sensitive receptors located near the Project site – the nearest sensitive receptor to the Project site is a residential community located approximately 530 feet to the north.

Additionally, results of the regional analysis indicate that the Project would not exceed the MDAQMD significance thresholds during construction or operations. Nor would the Project result in a CO "hotspot" as a result of Project-related traffic during ongoing operations. Therefore, sensitive receptors would not be subject to a significant air quality impact during Project construction or operational activities. As supported by the preceding, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is considered less-than-significant.

Level of Significance: Less-Than-Significant.

4.4 GREENHOUSE GAS EMISSIONS

4.4 GREENHOUSE GAS EMISSIONS

Abstract

This Section identifies and addresses potential global climate change (GCC) and greenhouse gas (GHG) emissions impacts that may result from construction and implementation of the Project. More specifically, the analysis evaluates the potential for the Project to cause or result in the following impacts:

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or*
- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

Based on the analysis presented within Victorville CarMax, Greenhouse Gas Analysis, City of Victorville *(Urban Crossroads, Inc.) October 2, 2018 (Project GHG Analysis), and summarized herein, all Project-related GHG impacts are considered less-than-significant.*

4.4.1 INTRODUCTION

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. GCC is currently one of the most controversial environmental issues in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred in the past over the course of thousands or millions of years. These historical changes to the earth's climate have occurred naturally without human influence, as in the case of an ice age. However, many scientists believe that the climate shift taking place

since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years.

An individual development proposal, such as the Project considered herein, cannot generate enough greenhouse gas emissions to effect a discernible change in the global climate. However, the Project may contribute to GCC through its increment of greenhouse gases (GHG) in combination with the cumulative increase in GHG from all other sources, which when taken together constitute potential influences on GCC. This Section summarizes the potential for the Project to have a significant effect upon the environment as a result of its potential contribution to GCC. Detailed analysis of the Project's potential GHG/GCC impacts is presented in *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018 (Project GHG Analysis); RDEIR Appendix D.

4.4.2 BACKGROUND

4.4.2.1 Global Climate Change

GCC refers to the change in average meteorological conditions with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2 (Carbon Dioxide), N_2O (Nitrous Oxide), CH_4 (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the atmosphere, but prevent heat from escaping, thus warming the atmosphere. GCC can occur naturally, as it has in the past with the previous ice ages.

4.4.2.2 Greenhouse Gases

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic (human) activity. Without the natural greenhouse gas effect, the average temperature would be approximately 61° Fahrenheit (F) cooler than it is currently. The accumulation of these gases in the atmosphere is considered to be the cause for the observed increase in the Earth's temperature.

GHGs have varying global warming potential (GWP) values; GWP values represent the potential of a gas to trap heat in the atmosphere. Carbon dioxide is used as the reference gas for GWP, and thus has a GWP of 1. GWP and atmospheric lifetimes of typical GHGs are summarized in Table 4.4-1.

Table 4.4-1
GHG Global Warming Potentials and Atmospheric Lifetimes

GHG	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		Second Assessment Report (SAR)	4th Assessment Report (AR4)
Carbon Dioxide	50 – 200	1	1
Methane	12 +/- 3	21	25
Nitrous Oxide	114	310	298
HFC-23	270	11,700	14,800
HFC-134a	14	1,300	1,430
HFC-152a	1.4	140	124
Sulfur Hexafluoride (SF6)	3,200	23,900	22,800

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.

The following discussions summarize and describe commonly occurring GHGs, their sources, and general characteristics.

Water Vapor

Water vapor (H_2O) is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere, it maintains a

climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.

As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. For example, increased atmospheric water vapor translates to increased cloud cover and increased reflection of incoming solar radiation (thus diminishing potential radiant heating of the Earth's surface).

There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. The main source of water vapor is evaporation from the oceans (approximately 85 percent). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.

Carbon Dioxide

Carbon dioxide (CO_2) is an odorless and colorless GHG. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. Carbon dioxide is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil,

natural gas, and wood. Carbon dioxide is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks.

Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.

Methane

Methane (CH_4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. No health effects are known to occur from exposure to methane.

Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide

Nitrous oxide (N_2O), also known as laughing gas, is a colorless GHG. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage).

Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant (i.e., in whipped cream bottles). It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction.

Chlorofluorocarbons

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs are no longer being used; therefore, it is not likely that health effects would be experienced. Nonetheless, in confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

Hydrofluorocarbons

Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Among the constituents classified as GHGs, they are one of three groups with the highest GWP. The HFCs with the greatest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a

(CH_3CHF_2). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt. No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The U.S. EPA estimates that concentrations of CF_4 in the atmosphere are over 70 ppt.

No health effects are known to result from exposure to PFCs. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur Hexafluoride

Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (22,800). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

4.4.2.3 Existing Greenhouse Gases Emissions Inventories

Global

Worldwide anthropogenic GHG emissions are tracked by the Intergovernmental Panel on Climate Change for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). This GHG emission data for Annex I nations is available through 2016. Global GHG emissions are summarized in Table 4.4-2, and are representative of currently available inventory data.

United States

As identified in Table 4.4-2, the United States, as a single country, was the number two producer of GHG emissions in 2016. The primary GHG emitted by human activities in the United States was CO_2, representing approximately 81.6 percent of total GHG emissions. Carbon dioxide from fossil fuel combustion is the largest source of GHG emissions in the United States.

Table 4.4-2
Global GHG Emissions by Major GHG Source Countries

Source Countries	GHG Emissions (Gg CO_2e)
China	11,895,765
United States	6,511,302
European Union (28-member countries)	4,291,252
India	2,643,817
Russian Federation	2,100,850
Japan	1,304,568
Total	**28,747,554**

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.
Note: Gg = Gigagrams; 1 Gigagram = 1,000 Metric Tons

State of California

Although California's rate of growth of GHG emissions is slowing, the state is still a substantial contributor. The California Air Resources Board (CARB) compiles GHG inventories for the State of California. Year over year, state GHG emissions continue to increase. Based upon the 2018 GHG inventory data (i.e., the latest year for which data are

available) for the 2000-2016 greenhouse gas emissions inventory, California emitted 429.4 Million Metric Tons Carbon Dioxide Equivalent ($MMTCO_2e$), including emissions resulting from imported electrical power in 2015.

City of Victorville

The City of Victorville is home to one of 14 cement facilities in California and the Southern California Logistics Airport. Both the cement facility and the airport are reflected in the City's GHG emissions inventories. Cement manufacturing is a highly GHG intense industrial process, and emissions related to cement manufacturing activities make up the majority of the City's GHG emissions profile. However, these emissions are not considered in the City's GHG emissions reduction target since the City has no control over plant operations, which are regulated by both the state and local air districts.

Project Site

The Project site is undeveloped and is not a substantive source of GHG emissions.

4.4.2.4 Effects of Climate Change in California

Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios Report indicates that large wildfires could become more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase

projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there may be years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of its water supply. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate O_3 pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including: precipitation, winds,

temperature, terrain, and vegetation, future risks would likely not be uniform throughout the state. For example, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Increased sea level elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12 to 14 inches.

4.4.2.5 Health Effects of Greenhouse Gases

Water Vapor

There are no known direct health effects related to water vapor at this time. However, water vapor can be a transport mechanism for other pollutants to enter the human body.

Carbon Dioxide

According to the National Institute for Occupational Safety and Health (NIOSH), high concentrations of carbon dioxide can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of carbon dioxide in the earth's atmosphere are estimated to be approximately 370 ppm, while the actual reference exposure level (level at which

adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period (NIOSH 2005).

Methane

Methane is extremely reactive with oxidizers, halogens, and other halogen-containing compounds, may displace oxygen in an enclosed space and act as an asphyxiant.

Nitrous Oxide

Nitrous Oxide is often referred to as laughing gas; it is a colorless GHG. The health effects associated with exposure to elevated concentrations of nitrous oxide include dizziness, euphoria, slight hallucinations, and in extreme cases of elevated concentrations nitrous oxide can also cause brain damage.

Fluorinated Gases (HFCs, PFCs, SF_6)

High concentrations of fluorinated gases can also result in adverse health effects such as asphyxiation, dizziness, headache, cardiovascular disease, cardiac disorders, and in extreme cases, increased mortality.

Aerosols

Health effects of aerosols are similar to those of other fine particulate matter. More specifically, aerosols can cause elevated respiratory and cardiovascular diseases and increased mortality.

4.4.3 GCC REGULATORY SETTING

The current GHG regulatory setting is extensive and constantly evolving. The GHG regulatory setting is discussed in detail within the Project GHG Analysis (Section 2.7). Current aspects of the GHG regulatory setting of relevance to the Project are summarized below.

4.4.3.1 State of California

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012. The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels. Substantial progress has also been made in achieving the State goal of reducing GHG emissions to 1990 levels by 2020.

CARB Scoping Plan. The CARB Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 and thereby comply with AB 32 GHG emissions reductions targets. The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors.

The CARB approved the First Update to the Scoping Plan (Update) on May 22, 2014. The Update identifies progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and strategies. The Update does not set new targets for the State, but rather describes a path that would achieve the State's 2050 goal to achieve GHG emissions levels that are 80 percent below 1990 baseline levels.

As part of CEQA compliance for the Scoping Plan, CARB prepared a Supplemental Functional Equivalent Document (FED) in 2011. The FED included an updated 2020 BAU emissions inventory projection based on current economic forecasts (i.e., as influenced by the 2008 economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. The updated BAU estimate of 507 $MMTCO_2e$ by 2020 requires a reduction of 80 $MMTCO_2e$, or a 16 percent reduction below the estimated BAU levels to return to 1990 levels (i.e., 427 $MMTCO_2e$) by 2020.

To establish a BAU reduction scenario that is consistent with threshold definitions used in thresholds adopted by lead agencies for CEQA purposes and many climate action

plans, the updated inventory without regulations was also included in the Supplemental FED. The updated CARB 2020 BAU projection in the Supplemental FED is 545 $MMTCO_2e$. Considering the updated BAU estimate of 545 $MMTCO_2e$ by 2020, CARB estimates a 21.7 percent reduction below the estimated statewide BAU levels is necessary to return to 1990 emission levels.

2017 Climate Change Scoping Plan Update. In November 2017, CARB released the final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by Senate Bill 32 (SB 32). Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementing SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.

- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

In addition to the statewide strategies listed above, the 2017 Scoping Plan also recognizes local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB advocates local government attainment of a community-wide goal of 6 $MMTCO_2e$ or less per capita by 2030, and 2 $MMTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the extent feasible. Alternatively, a lead agency may employ performance-based metric using a climate action plan or other plan to reduce GHG emissions. Note, however, that the 2017 Scoping Plan specifically acknowledges that:

> . . . [a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA (2017 Scoping Plan, p. 102).

Senate Bill 32. On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the State to reduce statewide greenhouse gas emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15.

Cap-and-Trade Program. The Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program consistent with authority established under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce GHG emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In this manner, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-State or imported. Accordingly, GHG emissions associated with a CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-State or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the Program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve sufficient GHG emissions reductions by 2020 to achieve the emission target contained in AB 32. "Uncapped" strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional GHG emission reductions.

SB 375 - the Sustainable Communities and Climate Protection Act of 2008. The Sustainable Communities and Climate Protection Act of 2008 (SB 375) implements the following measures: (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss

(1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.

2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).

3. Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1493 Pavley Regulations and Fuel Efficiency Standards/Advanced Clean Cars Program. California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Initial CARB regulations and standards for 2009 – 2012 vehicles provided for an approximate 22 percent reduction in GHG emissions compared with the 2002 fleet GHG emissions. Initial CARB regulations and standards for 2013 – 2016 vehicles provided for an approximate 30 percent reduction in GHG emissions compared with the 2002 fleet GHG emissions.

The second phase of the Pavley bill, CARB Advanced Clean Cars Program, combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. By the year 2025, the Advanced Clean Cars Program will reduce GHGs from new cars by 34 percent from 2016 levels.

SB 350 - Clean Energy and Pollution Reduction Act of 2015. SB 350 reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved

infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly-owned utilities.

- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Executive Order B-55-18 and SB 100. Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

SB 100 raises California's RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030.

Executive Order S-3-05. Executive Order S-3-05 established the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07 – Low Carbon Fuel Standard. The California Low Carbon Fuel Standard (LCFS) contributes to State GHG emission reduction goals established under AB 32. THE LCFS program incentivizes adoption of low-carbon transportation fuels based on the fuel's lifecycle carbon intensity (CI). The current LCFS regulation became effective on January 1, 2016. In September 2018, CARB adopted regulatory amendments to extend the LCFS for an additional ten years with a target of 20% CI reduction from 2010 levels by 2030.

Executive Order S-13-08. The 2009 California Climate Adaptation Strategy (California Natural Resources Agency 2009) was adopted pursuant to Executive Order S-13-08. The Strategy is ". . . first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15. Executive Order B-30-15 aligns California's GHG reduction targets with those of leading international governments. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050 and directs CARB to update the Climate

Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2 equivalent ($MMCO_2e$). The Order also requires the State's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions.

Title 20 Appliance Efficiency Standards. California Code of Regulations, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the State and those designed and sold exclusively for use in recreational vehicles or other mobile equipment.

Title 24 Energy Efficiency Standards and California Green Building Standards. California Code of Regulations Title 24 Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Buildings permitted on or after January 1, 2020, must comply with the 2019 Energy Efficiency Standards.

California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen). CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011. CALGreen is updated on a regular basis, with the most recent update consisting of the 2019 California Green Building Code Standards. Under State law, local jurisdictions are permitted to adopt more stringent requirements. CALGreen requirements applicable to the Project would include those listed below. CALGreen Section citations are presented parenthetically.

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).

- Designated parking. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).

- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).

- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
  - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
  - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
  - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
  - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of note more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor potable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).

- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gal/day (5.303.1.1 and 5.303.1.2).

- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).

- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB Refrigerant Management Program. CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, California Code of Regulations.

The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

Tractor-Trailer GHG Regulation. Tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers, or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay

verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

Phase 1 and 2 Heavy-Duty Vehicle GHG Standards. CARB has adopted a new regulation for greenhouse gas (GHG) emissions from heavy-duty trucks and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the U.S. EPA rule for new trucks and engines nationally. Existing heavy-duty vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy Duty Tractor-Trailer Greenhouse Gas Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation.

CARB staff has worked jointly with the U.S. Environmental Protection Agency (U.S. EPA) and the National Highway Traffic Safety Administration (NHTSA) on the next phase of federal greenhouse gas (GHG) emission standards for medium- and heavy-duty vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year heavy-duty vehicles, including trailers.

SB 97 and the CEQA Guidelines Update. Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the Office of Planning and Research pursuant to subdivision (a)." Section 21097 was also added to the Public Resources Code.

Implementing SB 97, *CEQA Guidelines* Section 15064.4, was added to assist agencies in determining the significance of GHG emissions. Section 15064.4 allows agencies the

discretion to determine whether a quantitative or qualitative analysis is best for a particular project. *CEQA Guidelines* Section 15064.4 has been subsequently updated and clarified under the 2019 *CEQA Guidelines.*

California Air Pollution Control Officers Association (CAPCOA)

Statewide GHG threshold guidance provided by the California Air Pollution Control Officers Association (CAPCOA) indicates that a potentially significant GHG emissions impact could occur if project GHG emissions exceed 900 $MTCO_2e$/year (see: *CEQA & Climate Change* [CAPCOA] January 2008).

Mojave Desert Air Quality Management District (MDAQMD)

The Project lies within the Mojave Desert Air Basin (MDAB), which is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). GHG emissions significance thresholds for new development projects is identified in the MDAQMD *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines* (MDAQMD) August 2016 (MDAQMD Guidelines). Per the MDAQMD Guidelines "[a] significant project must incorporate mitigation sufficient to reduce its impact to a level that is not significant" (MDAQMD Guidelines, p. 9). The MDAQMD significant emissions thresholds for GHG emissions is 548,000 pounds per day (CO2e), and 100,000 tons per year (CO2e) (MDAQMD Guidelines, p.9, Table 6 - *Significant Emissions Thresholds*).

South Coast Air Quality Management District (SCAQMD)

The SCAQMD has jurisdiction over the neighboring South Coast Air Basin. Although the Project is not under jurisdiction of the SCAQMD, SCAQMD GHG emissions policies and regulations provide additional context for the Project GHG emissions. Relevant SCAQMD GHG emissions policies and regulations are summarized below.

The SCAQMD *Draft Guidance Document – Interim CEQA GHG Significance Threshold Guidance Document* provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.

- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and Commercial land use: 3,000 $MTCO_2e$ per year.
    - Industrial land use: 10,000 $MTCO_2e$ per year.
    - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; or mixed use: 3,000 $MTCO_2e$ per year.

- Tier 4 has the following options:
    - Option 1: Reduce BAU emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures.
    - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans.
    - Option 3, 2035 target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans.

- Tier 5 involves mitigation offsets to achieve target significance threshold.

SCAQMD Regulation XXVII, adopted in 2009 includes the following Rules addressing GHG emissions:

- Rule 2700 defines terms and post global warming potentials.

- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.

- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

4.4.3.2 City of Victorville

The City CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. In order to determine consistency with the CAP, the City of Victorville has developed Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP contains a menu of measures that would reduce GHG emissions from new development projects. These measures address energy conservation, water use reduction, increased residential density or mixed uses, transportation management, and solid waste recycling. Screening Table measures are assigned a point value. The point values are adjusted according to the intensity of action – items with modest adoption/installation (those that reduce GHG emissions by modest amounts) yield fewer points; enhanced adoption/installation measures yield more points. Projects that yield at least 45 points are determined to be consistent with the CAP. Per the CAP, projects that achieve a total of 45 points or more do not require quantification of project-specific GHG emissions. Projects that are consistent with adopted CAP are also considered to support and would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The City of Victorville has not adopted a quantified ($MTCO_2e$/year) GHG emissions threshold.

4.4.4 SOURCES OF PROJECT GHG EMISSIONS

4.4.4.1 Construction-Source GHG Emissions

Project construction activities would generate emissions of CO_2 and CH_4. Project construction-source emissions are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational GHG emissions. Accordingly, Project construction-source GHG emissions were amortized over a 30-year period and added to the annual operational-source GHG emissions of the Project.

4.4.4.2 Operational-Source GHG Emissions

Project operations would result in emissions of CO_2, CH_4, and N_2O from the following primary sources:

- Building Energy Use (combustion emissions associated with natural gas and electricity);
- Water Supply, Treatment and Distribution;
- Solid Waste; and
- Mobile Source Emissions.

Area Source Emissions

Landscape and site maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions

associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions.

Mobile Source Emissions

GHG emissions will also result from mobile sources associated with the Project. Trip characteristics available from the Project Traffic Impact Analysis were utilized in this analysis.

Solid Waste Management Emissions

The Project land uses will result in the generation and disposal of solid waste. A large percentage of solid waste generated by the Project would be diverted and recycled consistent with requirements of AB 39. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material.

Water Supply, Treatment and Distribution Emissions

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water.

4.4.5 PROJECT GHG EMISSIONS IMPACTS

4.4.5.1 California Emissions Estimator Model™ Employed to Estimate GHG Emissions

On October 17, 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NOx, SOx, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational emissions of the Project.

4.4.5.2 Impact Statements

Potential Impact: *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

Impact Analysis: An individual project cannot generate enough GHG emissions to influence global climate change. A project participates in this potential impact by its incremental contribution combined with the cumulative increase of all other sources of GHGs, which when taken together may have a significant impact on global climate change.

As previously discussed, the City's CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP includes Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures. The CAP contains a menu of measures encompassing energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual CAP measures are assigned a point value. Projects that yield at least 45 points are determined to be consistent with the CAP.

Although the CAP states that quantification of emissions is not required, quantification of GHG emissions attributable to the Project are presented herein and are disclosed for informational purposes only. Project GHG emissions from construction and operations are presented at Table 4.4-3.

Table 4.4-3
Annual Project GHG Emissions

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	9.55	0.00	0.00	9.60
Area Sources	2.70E-04	0.00	0.00	2.90E-04
Energy Consumption	74.74	2.65E-03	8.30E-04	75.06

Table 4.4-3
Annual Project GHG Emissions

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Mobile Sources	187.97	0.02	0.00	188.36
Solid Waste Management	8.88	0.52	0.00	22.00
Water Usage	7.15	0.04	8.90E-04	8.30
Total CO_2E (All Sources)	**303.32**			

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.
Table results include scientific notation; e is used to represent times ten raised to the power of (which would be written as x 10^{b}") and is followed by the value of the exponent.

As shown above, the Project will result in approximately 114.95 $MTCO_2e$ per year from construction, area, energy, waste, and water usage. In addition, the Project has the potential to result in an additional 188.36 $MTCO_2e$ per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are "new" trips resulting from the development of the Project. The Project has the potential to generate a total of approximately 303.32 $MTCO_2e$ per year.

As part of the GHG Impact Analysis, the Project's consistency with the City of Victorville CAP was evaluated. A representative example of how the Project could achieve a minimum of 45 Screening Table Points through implementation of the CAP Screening Table Measures is provided at Table 4.4-4.

Table 4.4-4
Project GHG Emissions Screening Table Measures

Measure		Assigned Point Values	Project Points
Building Envelope			
Insulation	2008 baseline (walls R-13; roof/attic R-30)	0 points	15
	Modestly Enhanced Insulation (walls R-13, roof/attic R-38)	15 points	
	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	18 points	
	Greatly Enhanced Insulation (spray foam insulated walls R-15 or higher, roof/attic R-38 or higher)	20 points	
Windows	2008 Baseline Windows (0.57 U-factor, 0.4 solar heat gain coefficient [SHGC])	0 points	7

Table 4.4-4
Project GHG Emissions Screening Table Measures

Measure		Assigned Point Values	Project Points
	Modestly Enhanced Window Insulation (0.4 U-factor, 0.32 SHGC)	7 points	
	Enhanced Window Insulation (0.32 U-factor, 0.25 SHGC)	8 points	
	Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less SHGC)	12 points	
Indoor Space Efficiencies			
Water Heaters	2008 Minimum Efficiency (0.57 Energy Factor)	0 points	14
	Improved Efficiency Water Heater (0.675 Energy Factor)	14 points	
	High Efficiency Water Heater (0.72 Energy Factor)	16 points	
Reduction Measure PS T3: Electric Vehicle Infrastructure			
Electric Vehicles	Provide public charging station for use by an electric vehicle (ten points for each charging station within the facility).	10 points	10
TOTAL POINTS			**46**

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018, Appendix 3.2: *Screening Tables*.

The City, through established design review and development permit processes, would ensure that the Project final designs achieve Screening Table points identified at Table 4.4-4. It is noted here that the CAP Screening Table points identified above are minimums that would be achieved by the Project. Final designs as approved by the City may yield additional Screening Table points and further GHG emissions reductions. To facilitate implementation and monitoring of the Project Screening Table Measures, the following Mitigation Measure is incorporated in the RDEIR.

4.4.1 *The Project shall implement Screening Table Measures that achieve at least 45 points per the Screening Tables. The City shall verify that Screening Table Measures achieving the 45-point performance standard are incorporated in development plans prior to the issuance of building permit(s) and/or site plans (as applicable). The City shall verify implementation of the selected Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. At the discretion of the City, measures that provide GHG reductions*

> *equivalent to GHG emissions reductions achieved via the Screening Table Measures may be implemented.*

As noted previously, the City of Victorville has not adopted a quantified threshold of significance for determining impacts with respect to GHG emissions. As directed by the City, within this analysis, the SCAQMD screening-level threshold of 3,000 $MTCO_2e$/year is employed to determine if additional analysis of GHG emissions impacts and implementation of GHG emissions mitigation measures is warranted. The SCAQMD 3,000 $MTCO_2e$/year threshold is a widely accepted conservative metric; and is used by numerous lead agencies. As noted by the SCAQMD:

> . . . the . . . [3,000 $MTCO_2e$/year] screening-level for stationary sources is based on an emission capture rate of 90 percent for all new or modified project . . . the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [$MMTCO_2e$/yr.]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control

> Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility (Guidance Document, pp. 3-2, 3-3).

Based on the above guidance from the SCAQMD, if a project would emit GHGs totaling less than 3,000 $MTCO_2e$/year, the project is not considered a substantial GHG emitter and the GHG impact is less-than-significant. SCAQMD guidance indicates no additional analysis is required and no mitigation need be imposed. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 $MTCO_2E$/year, then the project could be considered a potentially significant GHG emitter, requiring additional analysis and potential mitigation. The Project would generate an estimated 303.32 $MTCO_2e$/year, would not exceed the applicable threshold of 3,000 $MTCO_2e$/year. On this basis, the potential for the Project to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment is considered less-than-significant.[1]

[1] Per the SCAQMD thresholds applied in this analysis, the Project GHG emissions comprise only 10.1 percent of the SCAQMD GHG emissions screening threshold. Comparison of the Project GHG emissions with other potentially relevant thresholds further substantiates that Project GHG emissions do not comprise a significant impact on the environment. In this regard, MDAQMD establishes a significance threshold of 100,000 tons/year, or 548,000 pounds per day to be employed in CEQA analyses (*MDAQMD California Environmental Quality Act [CEQA] and Federal Conformity Guidelines* [MDAQMD] August 2016, p. 9). The Project GHG emissions of 303.32 MTCO2e/year represent approximately 0.3 percent (0.003) of the MDQAMD threshold condition. In context of the quantified MDAQMD numeric threshold, Project GHG emissions would be less-than-significant. Statewide GHG guidance provided by the California Air Pollution Control Officers Association (CAPCOA) establishes a 900 MTCO2e/year threshold for project GHG emissions (see: *CEQA & Climate Change* [CAPCOA] January 2008). The Project GHG emissions of 303.32 MTCO2e/year would represent only 30 percent (0.3) of the CAPCOA GHG threshold guidance, and would be less-than-significant. Arguably, because the nominal Project GHG emissions (303.32 MTCO2e/year) do not meet or even approach threshold conditions (CAPCOA: 900 MTCO2e/year; SCAQMD: 3,000 MTCO2e/year), MDAQMD (100,000 tons/year; 548,000 pounds per day) the Project presumptively would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Level of Significance: Less-Than-Significant.

Potential Impact: *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

Impact Analysis: As discussed above, the Project would be consistent with the City of Victorville's adopted CAP since it will achieve the required minimum 45 points per the City's Screening Tables. Previous Mitigation Measure 4.4.1 ensures timely monitored implementation of City CAP requirements. Moreover, because the Project GHG emissions would not exceed the SCAQMD 3,000 $MTCO_2e$/year screening-level GHG thresholds noted herein, the Project is not considered to directly or indirectly generate significant GHG emissions.

The Project would not otherwise interfere with any existing or future City-mandated, state-mandated, or federally-mandated obligations enacted or promulgated to legally require development projects to assist in meeting state-adopted greenhouse gas emissions reduction targets, including those proposed or established by: CARB, State implementation of (i) Executive Order B30-15 and SB 32's target of reducing statewide GHG emissions to 40% below 1990 levels by 2030 ; or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80% below 1990 levels by 2050. These measures are reflected in the CARB 2008 Scoping Plan, and the CARB 2017 Scoping Plan. Project compliance with applicable provisions of the 2008 Scoping Plan and 2017 Scoping Plan are summarized below.

Table 4.4-5
2008 Scoping Plan Consistency

Action Category	Supporting Measures	Remarks
Cap-and-Trade Program	--	**Consistent.** These programs involve capping emissions from electricity generation and similar operations. The Project would not interfere with or obstruct cap-and-trade program measures or initiatives.
Light-Duty Vehicle Standards	T-1	**Consistent.** This is a statewide measure and is not within the purview of the Project. Vehicles accessing the Project would be required to comply with these standards as implemented. Electric Vehicle (EV) charging stations would be installed on site per 2019 Title 24 standards.
Energy Efficiency	E-1	**Consistent.** The Project would achieve building, water, and solid waste management efficiencies consistent with the incumbent CALGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard (RPS)	E-3	**Consistent.** Establishes the minimum statewide renewable energy mix. The Project would not interfere with or obstruct RPS program measures or initiatives.
Low Carbon Fuel Standard	T-2	**Consistent.** Establishes reduced carbon intensity (CI) of transportation fuels. The Project would not interfere with or obstruct transportation fuel CI program measures or initiatives.
Regional Transportation-Related GHG Targets	T-3	**Consistent**. This is a statewide measure and is not within the purview of the Project. The Project would not interfere with or obstruct transportation-related GHG target measures or initiatives.
Vehicle Efficiency Measures	T-4	**Consistent.** This is a statewide measure and is not within the purview of the Project. Vehicles accessing the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct vehicle efficiency measures or initiatives.
Goods Movement	T-5	**Consistent.** This is a statewide measure and is not within the purview of the Project. Goods movement associated with the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct goods movement measures or initiatives.
	T-6	
Million Solar Roofs (MSR) Program	E-4	**Consistent.** The MSR program sets a goal for use of solar systems throughout the state as a whole. Building designs would incorporate solar panels providing hot water heating for the Project.
Medium- & Heavy-Duty Vehicles	T-7	**Consistent.** This is a statewide measure and is not within the purview of the Project. Medium- & heavy-duty vehicles accessing the Project would be required to comply with these measures as implemented. The Project would not interfere with or obstruct medium- & heavy-duty vehicle measures or initiatives.
	T-8	
Industrial Emissions	I-1	

Table 4.4-5
2008 Scoping Plan Consistency

Action Category	Supporting Measures	Remarks
	I-2	**Consistent.** These measures are applicable to large industrial facilities (> 500,000 $MTCO_2e$/yr) and other intensive uses such as refineries. The Project would not interfere with or obstruct industrial emissions measures or initiatives.
	I-3	
	I-4	
	I-5	
High Speed Rail	T-9	**Consistent.** Supports increased mobility choice via provision of high speed rail. The Project would not interfere with or obstruct high speed rail measures or initiatives.
Green Building Strategy	GB-1	**Consistent.** The Project would implement building, water, and solid waste management efficiencies consistent with incumbent CALGreen requirements.
High Global Warming Potential (GWP) Gases	H-1	**Consistent.** The Project is not a substantial source of high GWP emissions. The Project would not interfere with or obstruct high GWP emissions measures or initiatives.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	**Consistent.** The Project would comply with mandated State, County, and City recycling and waste management measures.
	RW-2	
	RW-3	
Sustainable Forests	F-1	**Consistent.** The Project would promote carbon sequestration through provision of per the Project on-site landscaping.
Water	W-1	**Consistent.** The Project would provide low-flow fixtures and water-efficient landscaping per City and State requirements.
	W-2	
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	**Consistent.** The Project is not an agricultural use. The Project would not interfere with or obstruct Scoping Plan agricultural measures or initiatives.

Table 4.4-6
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	**Consistent.** The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**Consistent.** The Project would be designed and constructed to implement the energy efficiency measures for new commercial developments. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		**Consistent.** The Project would be designed and constructed to implement energy efficiency measures acting to reduce electricity consumption. The Project includes energy efficient lighting and fixtures that meet the current Title 24 Standards. Further, the Project proposes contemporary commercial facilities that would incorporate energy efficient insulation, windows, water heaters; and provides for electric vehicle charging.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR,	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase

Table 4.4-6
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
existing Advanced Clean cars regulations.	Local Agencies	GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2 standards.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOx standard.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NOx or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.		**Consistent**. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional		**Consistent.** The Project would implement Transportation Demand Measures (TDMs) as may be stipulated through the Project Conditions of Approval.

Table 4.4-6
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**Consistent.** The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	**Consistent.** The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA,	**Consistent.** This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not

Table 4.4-6
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
	CARB, Caltrans, CEC, GO-Biz	obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Consistent.** The Project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.	CARB	**Consistent.** When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	**Consistent.** The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50 percent reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLPS and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	**Consistent.** The Project would implement waste reduction and recycling measures consistent with State, County, and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLPS and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Consistent.** The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Consistent.** The Project site is designated for commercial uses. The Project does not propose land conversion. The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.
Increase the long-term resilience of carbon		**Consistent.** The Project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency

Table 4.4-6
2017 Scoping Plan Consistency

Action	Responsibility	Remarks
storage in the land base and enhance sequestration capacity.		efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**Consistent.** Where appropriate, Project designs will incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Consistent.** The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.	CARB	**Consistent.** The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments	**Consistent.** The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Consistent.** The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

As supported by the preceding discussions, the potential for the Project to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases is considered less-than-significant.

Level of Significance: Less-Than-Significant.

4.5 NOISE

4.5 NOISE

Abstract

This Section assesses whether the Project would substantially increase ambient noise levels, or expose land uses to noise, groundborne noise, or groundborne vibration levels exceeding established standards. In this regard, potential impacts considered within this Section include:

- *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

- *Generation of excessive groundborne vibration or groundborne noise levels.*

Additionally, as substantiated in the Initial Study (RDEIR Appendix A), the Project's potential impacts under the following topic were previously determined to be less-than-significant and are not further discussed here:

- *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, expose people residing or working in the Project area to excessive noise levels.*

As substantiated in the following analyses, all Project-related noise impacts are considered less-than-significant.

4.5.1 INTRODUCTION

This Section presents the noise setting, methodology, standards of significance, and potential noise impacts associated with the Project. The information presented in this section has been summarized from *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018 (Project Noise Study). The Project Noise Study in its entirety is included in Appendix E to this RDEIR.

4.5.2 SETTING

The following are discussions of noise fundamentals applicable to the Project, together with assessments of existing ambient noise levels and noise sources in the Project vicinity.

4.5.2.1 Fundamentals of Noise

Simply put, "noise" is unwanted sound. For the purposes of this analysis, "noise" is considered to consist generally of sounds created by the operation of commercial and industrial uses, by cars and trucks, by airplanes, and by other non-residential uses.

Noise levels are measured on a logarithmic scale in decibels. To provide an average measure of noise as it is perceived by the average person, these measurements are weighted and added over a 24-hour period to reflect not only the magnitude of the sound, but also its duration, frequency, and time of occurrence. There are various ways of calculating these daily averages, including: equivalent sound levels (Leq), day-night average sound levels (Ldn) and community noise equivalent levels (CNEL). The following analysis uses Leq to evaluate potential construction and operational noise impacts, and CNEL to evaluate off-site traffic noise impacts.

"A-weighted" decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against the very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. The decibel scale has a value of 0.0 dBA at the threshold of hearing and 140 dBA at the threshold of pain. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. A 1.0 decibel increase is barely audible, whereas a 10-

decibel increase is perceived as being twice as loud as before. Representative decibel levels of various noise sources are presented in Figure 4.5-1.

Noise Rating Schemes

Equivalent sound levels are not measured directly but, rather, are calculated from sound pressure levels typically measured in dBA. The equivalent sound level (Leq) is the constant level that, over a given period, transmits the same amount of acoustic energy as the actual time-varying sound. Equivalent sound levels are the basis for both the Ldn and CNEL scales.

Day-night average sound levels (Ldn) are a measure of the cumulative noise exposure of the community. The Ldn value results from a summation of hourly Leq over a 24-hour period with an increased weighting factor applied to the night period between 10:00 p.m. and 7:00 a.m. This noise rating scheme accounts for subjectively more annoying noise events which occur during normal sleep hours.

Community noise equivalent levels (CNEL) also carry a weighting penalty for noise that occurs during the nighttime hours. In addition, CNEL levels include a penalty for noise events that occur during the evening hours between 10:00 p.m. and 7:00 a.m. Because of the weighting factors applied, CNEL values at a given location will always be larger than Ldn values, which in turn will exceed Leq values. However, CNEL values are typically within one decibel of the Ldn value.

Sound Propagation

For a "line source" of noise such as a heavily traveled roadway, the noise level drops off by a nominal value of 3.0 decibels for each doubling of distance between the noise source and the noise receptor. The nominal value of 3.0 dBA with doubling applies to sound propagation from a line source: (1) over the top of a barrier greater than three meters in height; or (2) where there is a clear unobstructed view of the highway, the ground is hard, no intervening structures exist and the line-of-sight between the noise source and receptor averages more than three meters above the ground.

TYPICAL NOISE LEVELS AND THEIR SUBJECTIVE LOUDNESS AND EFFECTS

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		SLEEP DISTURBANCE
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

SOURCE: NOISE TECHNICAL SUPPLEMENT BY CALTRANS

Source: Urban Crossroads, Inc.

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Figure 4.5-1
Typical Noise Levels

Notwithstanding, environmental factors such as wind conditions, temperature gradients, characteristics of the ground (hard or soft) and the air (relative humidity), and the presence of vegetation combine to typically increase the attenuation achieved outside laboratory conditions to approximately 4.5 decibels per doubling of distance. The increase in noise attenuation in exterior environments is particularly true: (1) for freeways with an elevated or depressed profile or exhibiting expanses of intervening buildings or topography; (2) where the view of a roadway is interrupted by isolated buildings, clumps of bushes, scattered trees; (3) when the intervening ground is soft or covered with vegetation; or (4) where the source or receptor is located more than three meters above the ground.

In an area which is relatively flat and free of barriers, the sound level resulting from a single "point source" of noise drops by six decibels for each doubling of distance or 20 decibels for each factor of ten in distance. This applies to fixed noise sources and mobile noise sources which are temporarily stationary, such as an idling truck or other heavy-duty equipment operating within a confined area (such as industrial processes or construction).

Noise Barrier Attenuation

Noise barriers along roadways can reduce noise effects of vehicular-source at adjacent land uses. A noise barrier is most effective when placed close to the noise source or receptor. Noise barriers, however, do have limitations. For a noise barrier to be effective, it must be high enough and long enough to block the view of the noise source.

Vibration

According to the Federal Transit Administration (FTA) Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of groundborne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne

sound, groundborne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and discussed in decibel (dB) units to compress the range of numbers required to describe vibration. The vibration velocity level is denoted as VdB in this document. Vibration impacts are generally associated with activities such as train operations, construction and heavy truck movements.

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

4.5.2.2 Factors Affecting Motor Vehicle Noise

According to the Highway Traffic Noise Analysis and Abatement Policy and Guidance, provided by the Federal Highway Administration (FHWA), the level of traffic noise depends on three primary factors: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the vehicle mix within the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and a greater number of trucks. A doubling of the traffic volume, assuming that the speed and vehicle mix do not change, results in a noise level increase of 3 dBA. The vehicle mix on a given roadway may also affect community noise levels. As the number of medium and heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise level impacts will increase. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires on the roadway.

To account for the ground-effect attenuation (absorption), two types of site conditions are commonly used in traffic noise models, soft site and hard site conditions. Soft site

conditions account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. A drop-off rate of 4.5 dBA per doubling of distance is typically observed over soft ground with landscaping, as compared with a 3.0 dBA drop-off rate over hard ground such as asphalt, concrete, stone and very hard packed earth. The Project Noise Study indicates that, generally, soft site conditions better reflect the predicted noise levels. In addition, Caltrans' research has shown that the use of soft site conditions is more appropriate for the application of the FHWA traffic noise prediction model used in this analysis.

4.5.2.3 Community Responses to Noise

Approximately ten percent of the population has a very low tolerance for noise and will object to any noise not of their making. As a result, even in the quietest environment, some complaints will occur. By comparison, about one-fourth of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from various people exposed to the same noise environment.[1]

Despite this variability in behavior on an individual level, populations in general can be expected to exhibit the following responses to changes in noise levels:

- An increase or decrease of 1.0 dBA cannot be perceived except in carefully controlled laboratory experiments.
- A 3.0 dBA increase may be perceptible outside of the laboratory.
- An increase of 5.0 dBA is often necessary before any noticeable change in community response (i.e., complaints) would be expected.

Community responses to noise may range from registering a complaint by telephone or letter, to initiating court action. Several factors are related to the level of community annoyance including:

[1] U.S. Environmental Protection Agency Office of Noise Abatement and Control. *Noise Effects Handbook-A Desk Reference to Health and Welfare Effects of Noise*. October 1979 (revised July 1981).

- Fear associated with noise-producing activities;
- Noise receptor's perception that they are being unfairly treated;
- Attitudes regarding the usefulness of the noise-producing activity;
- Receptor's belief that the noise source can be controlled.

Recent studies have shown that changes in long-term noise levels are noticeable and are responded to by people. For example, about ten percent of the people exposed to traffic noise of 60 Ldn will report being highly annoyed with the noise, and each increase of one Ldn is associated with approximately two percent more people being highly annoyed. When traffic noise exceeds 60 Ldn or aircraft noise exceeds 55 Ldn, people begin complaining. Group or legal actions to stop the noise should be expected to begin at traffic noise levels near 70 Ldn and aircraft noise levels near 65 Ldn.

4.5.2.4 Land Use Compatibility With Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches and residences are more sensitive to noise intrusion than are commercial or industrial activities, as ambient noise levels affect the perceived amenity or liveability of a development or a community. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process.

4.5.2.5 Sensitive Receptors

Land uses classified as noise-sensitive by the State of California include: schools, hospitals, rest homes, long-term care centers, and mental care facilities. Some jurisdictions also consider day care centers, single-family dwellings, mobile home parks, churches, libraries, and recreation areas to be noise-sensitive. Moderately noise-sensitive land uses typically include: multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs.

Land uses which are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space,

undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

Primary sensitive receptors in the Project vicinity include existing residential uses located to the north, across Roy Rogers Drive.

4.5.2.6 Current Noise Exposure

To characterize the existing noise level environment, four 24-hour noise level measurements were taken at receiver locations in the Project study area. Noise measurement locations are illustrated in Figure 4.5-2 and are representative of sites that may be affected by Project-generated noise. Descriptions of noise measurement locations and monitored noise levels are summarized in Table 4.5-1.

Table 4.5-1
Ambient Noise Levels (24-Hour)

Location	Distance to Project Boundary	Description	Energy Average Hourly Noise Level (dBA Leq)		CNEL
			Daytime	Nighttime	
L1	1,460′	Located north of the Project site adjacent to existing residential homes on Midtown Drive.	55.7	50.7	58.7
L2	640′	Located northeast of the Project site near existing residential homes on Culver Road.	58.1	49.7	59.2
L3	803′	Located southwest of the Project site adjacent to Home Depot and an existing commercial parking lot.	56.7	53.5	60.9
L4	645′	Located southwest of the Project site on Valley Park Lane adjacent to an existing Home Depot and vacant lot.	59.0	51.7	60.4

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

N

NOT TO SCALE

Source: Urban Crossroads, Inc.

*Project site plan boundaries may not reflect the boundary presented in Figure 3.5-1, Conceptual Site Plan. Findings and conclusions of the technical studies are not affected.

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Figure 4.5-2
Noise Measurement Locations

4.5.3 REGULATORY SETTING

To limit population exposure to intrusive noise levels, the City of Victorville has established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

4.5.3.1 State of California

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards and provides guidance for local land use compatibility. State law requires each county and city to adopt a General Plan that includes a Noise Element. The purpose of the Noise Element is to "limit the exposure of the community to excessive noise levels." In addition, CEQA requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

California Building Code

The 2016 State of California's Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available, and the noise level exceeds 65 dBA Leq for any hour

of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1).

4.5.3.2 Local Noise Standards

The City of Victorville General Plan Noise Element land use compatibility standards specify the noise levels allowable for new developments impacted by transportation noise sources. The City's compatibility criteria, found in Table N-3 of the General Plan, identify the criteria for commercial land uses such as the Project. When the unmitigated exterior noise levels approach 65 dBA CNEL commercial land use is considered *normally acceptable*. With exterior noise levels ranging from 70 to 75 dBA CNEL, commercial land uses are considered *conditionally acceptable*, and with exterior noise levels greater than 75 dBA CNEL, they are considered *normally unacceptable*. Please also refer to Exhibit 3-A of the Noise Impact Analysis.

Construction Noise Standards

Neither the City of Victorville General Plan or Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase.

To evaluate whether the Project will generate potentially significant construction noise levels at off-site sensitive receiver locations, a construction-related noise level threshold is adopted from the *Criteria for Recommended Standard: Occupational Noise Exposure* prepared by the National Institute for Occupational Safety and Health (NIOSH). A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The construction-related noise level threshold starts at 85 dBA for more than eight hours per day, and for every 3 dBA increase, the exposure time is cut in half. This results in noise level thresholds of 88 dBA for more than four hours per day, 92 dBA for more than one hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative construction noise level threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the

nearby receiver locations. Since this construction-related noise level threshold represents the energy average of the noise source over a given time, they are expressed as Leq noise levels. Therefore, the noise level threshold of 85 dBA Leq over a period of eight hours or more is used to evaluate the potential Project-related construction noise level impacts at the nearby receiver locations.

Additionally, the temporary or periodic construction noise level increases over the existing ambient conditions must be considered. Therefore, the Caltrans Traffic Noise Analysis Protocol 12 dBA Leq substantial noise level increase threshold is used in this analysis to assess temporary noise level increases. If the Project-related construction noise levels generate a temporary noise level increase above the existing ambient noise levels of 12 dBA Leq, then the Project construction noise level increases would be considered a potentially significant impact. Although the Caltrans recommendations were specifically developed to assess traffic noise impacts, the 12 dBA Leq substantial noise level increase threshold is used in California to address noise level increases with the potential to exceed existing conditions.

Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Victorville CarMax Project, stationary-source (operational) noise such as the expected rooftop air conditioning units, parking lot vehicle movements, vehicle deliveries, and vehicle maintenance activity are typically evaluated against standards established under a jurisdiction's Municipal Code.

Section 13.01.030 of the City of Victorville Municipal Code, establishes the noise level standards for stationary noise sources. Since the Project land use will potentially impact non-noise sensitive commercial uses in addition to noise-sensitive uses in the Project study area, the Noise Impact Analysis relies on the exterior noise level standards for all land uses identified by the City of Victorville Municipal Code. Applicable operational noise level standards are shown at Table 4.5-2.

Table 4.5-2
Operational Noise Standards

Jurisdiction	Land Use	Time Period	Exterior Noise Level Standard (dBA Leq)
City of Victorville	Residential	Daytime (7:00am – 10:00pm)	65
		Nighttime (10:00pm – 7:00am)	55
	Commercial	Anytime	70
	Industrial	Anytime	75

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

Vibration Standards

The City of Victorville has not identified or adopted specific vibration level standards. However, the United States Department of Transportation Federal Transit Administration (FTA) provides guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines allow 80 VdB for residential uses and buildings where people normally sleep. Operational and construction activities can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The FTA guidelines of 80 VdB for sensitive land uses provide a substantiated basis for determining the relative significance of potential Project-related vibration impacts due to on-site operational and construction activities.

4.5.4 STANDARDS OF SIGNIFICANCE

Based on the noise criteria presented above, and direction provided within the *CEQA Guidelines*, Project noise impacts would be considered potentially significant if the Project is determined to result in or cause the following conditions:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

- Generation of excessive groundborne vibration or groundborne noise levels; or

- 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, expose people residing or working in the Project area to excessive noise levels.

Summarizing the discussion presented previously within Section 4.5.3, significance criteria applicable to the Project is shown in the following table.

Table 4.5-3
Summary of Significance Criteria

Analysis	Receiving Land Use	Condition(s)	Significance Criteria
Off-Site Traffic Noise	Noise-Sensitive	if ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase
		if ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase
		if ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase
Operational Noise	Multiple	Exterior Noise Level Standards	See Table 4.5-2.
	Noise-Sensitive	if ambient is < 60 dBA L_{eq}	≥ 5 dBA L_{eq} Project increase
		if ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA L_{eq} Project increase
		if ambient is > 65 dBA L_{eq}	≥ 1.5 dBA L_{eq} Project increase
Construction Noise	All	Noise Level Threshold	85 dBA L_{eq}
	Noise-Sensitive	Noise Level Increase	12 dBA L_{eq}
	All	Vibration Level Threshold	80 VdB

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

4.5.5 POTENTIAL IMPACTS AND MITIGATION MEASURES

The following discussions focus on areas where it has been determined that the Project may result in potentially significant noise impacts, based on the analysis presented within this Section and included within the Initial Study (RDEIR Appendix A). Of the CEQA threshold considerations at Section 4.5.4, and as substantiated in the Initial Study, the Project's potential impacts under the following topic are determined to be less-than-significant, and are not further discussed in this Section:

- 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, expose people residing or working in the Project area to excessive noise levels.

Please refer also to Appendix A, Initial Study and NOP Responses; Initial Study Checklist Item XII., *Noise*.

The discussion of potential noise/vibration impacts is organized under the following topical headings:

- Construction-Source Noise;
- Vehicular-Source Noise;
- Operational/Area-Source Noise; and
- Vibration.

For each topical discussion, potential impacts are evaluated under applicable criteria summarized at Table 4.5-3.

SENSITIVE RECEIVER LOCATIONS

To assess the potential for short-term construction noise, long-term operational noise, and vibration impacts, five receiver locations were identified as representative locations for focused analysis, as shown in Figure 4.5-3 and described below.

R1: Location R1 represents the existing residential homes located approximately 1,315 feet northwesterly of the Project site on Midtown Drive. A 24-hour noise level measurement was taken near this location, L1, to describe the existing ambient noise environment.

R2: Location R2 represents the existing residential homes located approximately 530 feet northerly of the Project site on Culver Road. A 24-hour noise level measurement was taken near this location, L2, to describe the existing ambient noise environment.

R3: Location R3 represents a vacant, commercially-designated property located approximately 26 feet northerly of the Project site.

R4: Location R4 represents an existing commercial use, located roughly 78 feet southerly of the Project site.

R5: Location R5 represents an existing commercial use, located approximately 152 feet westerly of the Project site.

Other sensitive land uses in the Project study area that are located at greater distances than those identified in this analysis would experience lower noise levels than those identified here due to the additional attenuation from distance and the shielding of intervening structures.

N

LEGEND:

Receiver Locations

Distance from receiver to Project site boundary (in feet)

NOT TO SCALE

Source: Urban Crossroads, Inc.

*Project site plan boundaries may not reflect the boundary presented in Figure 3.5-1, Conceptual Site Plan. Findings and conclusions of the technical studies are not affected.

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Figure 4.5-3
Sensitive Receiver Locations

CONSTRUCTION-SOURCE NOISE

Potential Impact: *Project construction activities and associated noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

Impact Analysis: Construction noise represents a short-term impact on ambient noise levels. Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Project construction is expected to occur in the following stages:

- Site Preparation;
- Grading;
- Building Construction;
- Paving; and
- Architectural Coating.

The construction noise analysis was prepared using reference noise level measurements to describe the typical construction activity noise levels for each stage of Project construction.[2] The construction reference noise level measurements represent the noise generated by typical construction equipment and activities. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver and would be further reduced to 68 dBA at 200 feet from the source to the receiver.

[2] Please refer to Noise Impact Analysis (RDEIR Appendix E) Table 10-1 for a complete listing of reference noise levels used within the analysis.

Using the reference noise levels, Table 4.5-4 presents the highest noise levels at the sensitive receiver locations identified in Figure 4.5-4. Compliance with the applicable threshold (as shown in Table 4.5-3) is also presented.

Table 4.5-4
Project Construction Noise Level

Receiver Location	Unmitigated Construction Noise Levels (dBA Leq)		
	Maximum Construction Noise Level	Threshold[1]	Threshold Exceeded ?
R1	44.9	85	No
R2	52.2	85	No
R3	73.5	85	No
R4	63.0	85	No
R5	66.8	85	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

[1] Per NIOSH. Please also refer to Table 4.5-3.

As shown above, Project construction noise would not exceed the applicable threshold of 85 dBA Leq at any of the sensitive receiver locations. Based on the preceding, the potential for the Project to result in generation of noise levels in excess of standards is less-than-significant.

Level of Significance: Less-Than-Significant.

LEGEND:

- Receiver Locations
- Distance from receiver to construction activity (in feet)
- Construction Activity

NOT TO SCALE

Source: Urban Crossroads, Inc.

*Project site plan boundaries may not reflect the boundary presented in Figure 3.5-1, Conceptual Site Plan. Findings and conclusions of the technical studies are not affected.

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Figure 4.5-4
Construction Activity and Receiver Locations

TRAFFIC NOISE

Potential Impact: *Project-related off-site traffic noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

Impact Analysis: To assess impacts resulting from off-site Project-related traffic noise on area roadways, the Project Noise Study developed noise contours for Study Area roadway segments based on average daily trip (ADT) estimates, Project trip generation, and trip distribution as presented in *Traffic Impact Analysis, CarMax, Victorville, California* (Michael Baker International) revised June 3, 2019 (Traffic Impact Analysis).

The noise contours were used to assess the Project's incremental vehicular-source noise impacts at land uses adjacent to roadways conveying Project traffic. Potential off-site vehicular-source noise impacts were evaluated under the following scenarios:

- Existing Conditions Without / With Project: This scenario refers to the existing present-day noise conditions without and with the proposed Project.
- Opening Year 2021 Without / With Project: This scenario refers to Opening Year noise conditions with ambient growth, without and with the proposed Project. This scenario includes all cumulative traffic volumes identified in the Traffic Impact Analysis.
- Horizon Year 2031 Without / With Project: This scenario refers to Horizon Year noise conditions with ambient growth, without and with the proposed Project. This scenario includes all cumulative traffic volumes identified in the Traffic Impact Analysis.

Tables 4.5-5 through 4.5-7 present the noise levels associated with the above scenarios.

Table 4.5-5
Existing Conditions Plus Project Off-Site Traffic Noise Impacts

	Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise Sensitive Land Use?	Threshold Exceeded?[1]
			Without Project	With Project	Project Addition		
1	Civic Dr.	n/o Site Dwy #2	68.8	68.8	0.1	No	No
2	Civic Dr.	n/o Site Dwy #1	67.4	67.4	0.0	No	No
3	Civic Dr.	s/o Site Dwy #1	67.4	67.4	0.0	No	No
4	Roy Rogers Dr.	e/o Amargosa Rd.	69.3	69.3	0.0	No	No
5	Roy Rogers Dr.	w/o I-15 SB Ramps	71.0	71.0	0.0	No	No
6	Roy Rogers Dr.	w/o I-15 NB Ramps	72.4	72.4	0.0	Yes	No
7	Roy Rogers Dr.	e/o I-15 NB Ramps	69.2	69.2	0.0	No	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.
[1] Per FICON. Please also refer to Table 4.5-3.

As shown in Table 4.5-5, under Existing Plus Project Conditions, Project-related noise level increases would not exceed applicable thresholds presented in Table 4.5-3.

Table 4.5-6
Opening Year Off-Site Traffic Noise Impacts

	Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise Sensitive Land Use?	Threshold Exceeded?[1]
			Without Project	With Project	Project Addition		
1	Civic Dr.	n/o Site Dwy #2	69.1	69.1	0.0	No	No
2	Civic Dr.	n/o Site Dwy #1	67.7	67.7	0.0	No	No
3	Civic Dr.	s/o Site Dwy #1	67.6	67.6	0.0	No	No
4	Roy Rogers Dr.	e/o Amargosa Rd.	69.6	69.6	0.0	No	No
5	Roy Rogers Dr.	w/o I-15 SB Ramps	71.3	71.3	0.0	No	No
6	Roy Rogers Dr.	w/o I-15 NB Ramps	72.7	72.7	0.0	Yes	No
7	Roy Rogers Dr.	e/o I-15 NB Ramps	69.5	69.5	0.0	No	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.
[1] Per FICON. Please also refer to Table 4.5-3.

As shown in Table 4.5-6, under Opening Year Conditions, Project-related noise level increases would not exceed applicable thresholds presented in Table 4.5-3.

Table 4.5-7
Horizon Year Off-Site Traffic Noise Impacts

	Road	Segment	CNEL at Adjacent Land Use (dBA)			Noise Sensitive Land Use?	Threshold Exceeded?[1]
			Without Project	With Project	Project Addition		
1	Civic Dr.	n/o Site Dwy #2	69.8	69.9	0.1	No	No
2	Civic Dr.	n/o Site Dwy #1	68.5	68.5	0.0	No	No
3	Civic Dr.	s/o Site Dwy #1	68.4	68.4	0.0	No	No
4	Roy Rogers Dr.	e/o Amargosa Rd.	70.4	70.4	0.0	No	No
5	Roy Rogers Dr.	w/o I-15 SB Ramps	72.1	72.1	0.0	No	No
6	Roy Rogers Dr.	w/o I-15 NB Ramps	73.5	73.5	0.0	Yes	No
7	Roy Rogers Dr.	e/o I-15 NB Ramps	70.3	70.3	0.0	No	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.
[1] Per FICON. Please also refer to Table 4.5-3.

As shown in Table 4.5-7, under Horizon Year Conditions, Project-related noise level increases would not exceed applicable thresholds presented in Table 4.5-3.

Summary

A shown above, Project contributions to off-site roadway noise levels would not result in noise levels exceeding City standards (presented in Table 4.5-3) or that would significantly impact any existing or future sensitive noise receptors. On this basis, Project-related off-site traffic noise would not result in noise levels exceeding standards established in a general plan, noise ordinance, or other applicable standards of other agencies.

Level of Significance: Less-Than-Significant.

OPERATIONAL/AREA-SOURCE NOISE

Potential Impact: *Project operational/area-source noise would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

Impact Analysis: To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of uses/activities to represent the noise levels that can be expected with the operation of the proposed Project.[3] Project operational/area noise sources are anticipated to include: roof-top air conditioning units, parking lot vehicle movements, vehicle deliveries, and vehicle maintenance activity. Locations of the operational-source noise generators proposed within the Project site are illustrated in Figure 4.5-5.

Using the reference noise levels, operational noise levels as received at off-site sensitive receiver locations were estimated. Operational noise levels are presented in Table 4.5-8.

Table 4.5-8
Operational Noise Levels

Receiver	Land Use	Noise Source				Total Project Operational Noise Levels (dBA Leq)	Daytime Noise Level Standard (dBA Leq)[1]	Threshold Exceeded?
		Roof-Top A/C Unit	Parking Lot Vehicle Movements	Vehicle Deliveries	Vehicle Maint. Activity			
R1	Residential	26.0	35.5	42.4	34.0	43.8	65	No
R2	Residential	31.1	40.9	46.3	38.6	48.0	65	No
R3	Commercial	44.2	57.1	56.9	50.8	60.6	70	No
R4	Commercial	40.7	51.9	63.1	49.6	63.6	70	No
R5	Commercial	37.0	48.6	55.4	45.3	56.6	70	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.
[1] Per City of Victorville. Please also refer to Table 4.5-2.

[3] Reference noise levels for these noise sources employed in this analysis are presented at Noise Impact Analysis Table 9-1.

LEGEND:

- Receiver Locations
- Roof-Top Air Conditioning Unit
- Parking Lot Vehicle Movements
- Vehicle Delivery Activity
- Vehicle Maintenance Activity
- Distance from receiver to noise source (in feet)

NOT TO SCALE

Source: Urban Crossroads, Inc.

*Project site plan boundaries may not reflect the boundary presented in Figure 3.5-1, Conceptual Site Plan. Findings and conclusions of the technical studies are not affected.

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Figure 4.5-5
Operational Noise Source Locations

As shown above, noise levels associated with Project operations would not exceed applicable thresholds at the receiver locations. Based on the preceding discussion, the potential for Project operational/area-source noise to result in generation of noise levels in excess of standards established in the local general plan or noise ordinance is considered less-than-significant.

Level of Significance: Less-Than-Significant.

Potential Impact: *Project would result in generation of excessive groundborne vibration or groundborne noise.*

Impact Analysis: The following discussions address the Project's potential to generate groundborne vibration, also referred to as groundborne noise. The Project does not propose or require facilities or operations that would be substantive sources of vibration. Project construction activities may however result in potentially adverse vibration levels received at nearby properties.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that groundborne vibration from Project construction activities would cause only intermittent, localized intrusion. Project construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage. It is not expected that heavy equipment such as large bulldozers would operate close enough to any residences to cause a vibration impact.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Groundborne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). Construction activities that would have the potential to generate low levels of groundborne vibration within the Project site include grading. Using the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Table 4.5-9 presents the unmitigated Project construction-related vibration levels at each of the sensitive receiver locations.

Table 4.5-9
Construction Vibration Levels

Receiver Location	Distance to Construction Activity	Receiver Vibration Levels (VdB)					Threshold Exceeded?[1]
		Small Bulldozer	Jack-Hammer	Loaded Trucks	Large Bulldozer	Highest Levels	
R1	1,346′	6.1	27.1	34.1	35.1	35.1	No
R2	577′	17.1	38.1	45.1	46.1	46.1	No
R3	50′	49.0	70.0	77.0	78.0	78.0	No
R4	167′	33.3	54.3	61.3	62.3	62.3	No
R5	108′	38.9	59.9	66.9	67.9	67.9	No

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.

[1] Per FTA. Please also refer to Table 4.5-3.

As shown above, at distances ranging from 50 to 1,346 feet from the Project construction activities, construction vibration velocity levels are expected to range from 6.1 to 78.0 VdB. Based on the FTA threshold of 80 VdB for residential uses, Project construction vibration levels of up to 78.0 VdB are considered a less than significant vibration impact. Further, vibration levels at the site of the closest receiver are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating simultaneously adjacent to the Project site perimeter.

Based on the preceding, the potential for the Project to result in generation of excessive groundborne vibration or groundborne noise is less-than-significant.

Level of Significance: Less-Than-Significant.

4.6 ENERGY

4.6 ENERGY

Abstract

This Section identifies and addresses potential energy impacts that may result from construction and implementation of the Project. More specifically, the energy impacts analysis evaluates the potential for the Project to cause or result in the following impacts:

- *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*
- *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

As supported by the analysis presented in this Section, potential energy impacts of the Project would be less-than-significant.

4.6.1 BACKGROUND AND INTRODUCTION

In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted AB 1575, which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs; license thermal power plants of 50 megawatts or larger; develop energy technologies and renewable energy resources; plan for and direct responses to energy emergencies; and, perhaps most importantly, to promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards.

Of relevance to the Project and this RDEIR, AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the potential for wasteful, inefficient, and/or unnecessary consumption of energy caused by or resulting from a project. Appendix F to

the *CEQA Guidelines* (Guidelines) assists EIR preparers in this regard. More specifically, Guidelines Appendix F *Energy Conservation* establishes parameters and context for determining whether a project would result in the inefficient, wasteful, and unnecessary consumption of energy.

Guidelines Section 15126.2 *Consideration and Discussion of Significant Environmental Impacts,* as amended December 28, 2018, recognizes the need to consider Guidelines Appendix F *Energy Conservation* when analyzing project impacts (for EIRs). In this regard, Guidelines Section 15126.2 (b), excerpted below, provides the following guidance:

> **Energy Impacts.** If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. (Guidance on information that may be included in such an analysis is presented in Appendix F.) This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency.

In summary, the Project would provide for, and promote, energy efficiencies consistent with applicable state or federal standards and regulations. The Project would also conform to City of Victorville energy efficiency and energy conservation measures.

Moreover, energy consumed by the Project would be comparable to, or less than, energy consumed by other development proposals of similar scale and intensity. On this basis, the Project would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the Project would not cause or result in the need for additional energy-producing facilities or energy delivery systems. The Project would therefore not result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources. Nor would the Project result in significant environmental effects due to conflict with, or obstruction of, a state or local plan for renewable energy or energy efficiency.

4.6.2 EXISTING CONDITIONS

4.6.2.1 Overview

A summary of, and context for, energy consumption and energy demands within the State is presented in *U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts* excerpted below:

- California was the fourth-largest producer of crude oil among the 50 states in 2017, after Texas, North Dakota, and Alaska, and, as of January 2018, third in oil refining capacity after Texas and Louisiana.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation's jet fuel consumption in 2016.
- California's total energy consumption is second-highest in the nation, but, in 2016, the state's per capita energy consumption ranked 48th, due in part to its mild climate and its energy efficiency programs.
- In 2017, California ranked second in the nation in conventional hydroelectric generation and first as a producer of electricity from solar, geothermal, and biomass resources.

- In 2017, solar PV and solar thermal installations provided about 16% of California's net electricity generation. [1]

As indicated above, California is one of the nation's leading energy-producing states, and California per capita energy use is among the nation's most efficient.

4.6.2.2 Electricity and Natural Gas Resources

Electricity

Electricity would be provided to the Project by Southern California Edison (SCE). The Project site is vacant and undeveloped and does not contain uses or facilities that consume or produce electricity.

SCE is an investor-owned utility providing electric power to an estimated 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles.[2] SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. The California Public Utilities Commission (CPUC) regulates investor-owned electric utilities operating in California, including SCE.

Natural Gas

Natural gas would be provided to the Project by The Southwest Gas Corporation (Southwest Gas). The Project site is vacant and undeveloped and does not contain uses or facilities that consume or produce natural gas.

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[1] U.S. Energy Information Administration. (2018, November 15). California Profile. Retrieved August 13, 2019, from https://www.eia.gov/state/print.php?sid=CA

[2] Southern California Edison. (n.d.). Who We Are. Retrieved August 13, 2019, from https://www.sce.com/about-us/who-we-are

Southwest Gas is a wholesale customer of SoCalGas. SoCal Gas is the nation's largest natural gas distribution utility, serving approximately 21.8 million consumers through 5.9 million meters in more than 500 communities. The SoCal service territory encompasses approximately 24,000 square miles throughout Central and Southern California, from Visalia to the Mexican border. Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The CPUC regulates investor-owned natural gas utilities operating in California, including SoCal Gas.

4.6.2.3 Transportation Energy Resources

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline. Gasoline (and other vehicle fuels) are commercially-provided commodities and would be available to the Project patrons and employees via commercial outlets. The Project site is vacant and undeveloped and does not contain uses or facilities that consume or produce transportation energy resources.

California's historical demand for transportation fuels reflects a significant dependence on gasoline, diesel, and jet fuel. The transportation sector in California consumed more than 23.2 billion gasoline gallon equivalents (GGEs) of energy in 2015 [the latest date of record], of which 21.8 billion (or 94 percent) were fossil fuels. In 2005, California consumed roughly 23.5 billion GGE of fossil fuels. Since then, a notable decline in energy consumption occurred from 2007 to 2010, reflecting the effect of the 2008 financial crisis. However, since 2012 economic growth and declining crude oil prices have led to an increase in gasoline consumption. [3]

[3] *Transportation Energy Demand Forecast 2018 – 2030* (CEC) November 2017, p. 8.

4.6.3 STATE AND LOCAL ENERGY EFFICIENCY/ENERGY CONSERVATION PLANS

Project consistency with State of California and City of Victorville Energy Efficiency/Energy Conservation Plans and related policies and/or regulations is summarized at Table 4.6-1.

Table 4.6-1
State and Local Energy Efficiency/Energy Conservation Plan Consistency

PLANS, POLICES, REGULATIONS	Remarks
STATE of CALIFORNIA	
State Energy Plan The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.	**Consistent:** *The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access; takes advantage of existing infrastructure systems; and as approved by the Lead Agency, would introduce compatible commercial/retail development at the subject site. The Project therefore supports urban design and planning processes identified in the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.* *Based on the preceding, the Project is considered to be consistent with the State Energy Plan.*
California Code Title 24, Part 6: Energy Efficiency Standards California Code Title 24, Part 6 (also referred to as the California Energy Code), was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption. To these ends, the California Energy Code provides energy efficiency standards for residential and nonresidential buildings. The Project would be required to comply with energy efficiency standards in effect at the time of building permit application(s).	**Consistent:** *The Project would be designed, constructed and operated to meet or exceed incumbent Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards.* *Based on the preceding, the Project is considered to be consistent with California Code Title 24, Part 6: Energy Efficiency Standards.*
California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen). CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011. CALGreen is updated on a regular basis, with the most recent update consisting of the 2016 California Green Building Code Standards that became effective January 1, 2017. Under state law, local jurisdictions are permitted to adopt more stringent requirements.	**Consistent:** *The Project would be designed, constructed and operated to meet or exceed incumbent Title 24 CALGreen Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 CALGreen Standards.* *Based on the preceding, the Project is considered to be consistent with California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen).*

Table 4.6-1
State and Local Energy Efficiency/Energy Conservation Plan Consistency

PLANS, POLICES, REGULATIONS	Remarks
CITY of VICTORVILLE	
General Plan: The City of Victorville General Plan *Resource Element* establishes energy conservation Policies listed below	
Policy 7.1.1: Support development of solar, hybrid, wind and other alternative energy generation plants.	**Consistent:** *In support of General Plan Policy 7.1.1, and onsite energy production policies outlined in the Civic Center Community Specific Plan (CCCSP, Specific Plan), the Project would implement solar hot-water heating as well as solar-powered lighted bollards leading from the customer/employee lot to the front door of the sales building.* *Consistent with City requirements as outlined at General Plan Policy 7.2.1, the final Project designs and building plans as reviewed and approved by the City would be 15 percent more efficient than 2008 Title 24 Standards.* *The Project would not obstruct or interfere with City Policies supporting development of alternative energy sources or energy conservation. Prior to final site plan approval and issuance of the first building permit, Project building/facility energy efficiencies would be documented as part of the City's development review processes. Compliance with General Plan energy efficiency requirements would be verified by the City prior to issuance of a Certificate of Occupancy.* *Based on the preceding, the Project is considered to be consistent with General Plan Policies 7.1.1, 7.2.1, and 7.2.2.*
Policy 7.2.1: Support energy conservation by requiring sustainable building design and development for new residential, commercial and industrial projects.	
Policy 7.2.2: Support energy conservation by using low-emission non-fossil fuel reliant vehicles.	
Civic Center Community Sustainability Specific Plan: The Project is located within the boundaries of the Civic Center Community Sustainability Specific Plan (Specific Plan). Specific Plan Section 4 *Sustainability* establishes the following Policies addressing energy efficiency/energy conservation.	
Policy 3.1.1 Provide incentives for the use of on-site renewable energy sources such as wind turbines and solar panels.	**Consistent:** *This is a City-implemented Policy beyond the purview and scope of the Project. The Project would not interfere with or obstruct City efforts to incentivize use of renewable energy sources.* *Based on the preceding, the Project is considered consistent with Specific Plan Policy 3.1.1.*
Policy 3.1.2 Reduce energy consumption by utilizing energy saving products, sustainable building design and natural light.	**Consistent:** *CAP measures implemented by the Project comprise sustainable building design(s). Final Project designs as reviewed and approved by the City would provide for natural lighting of indoor spaces. Energy-saving products would be employed over the life of the Project. The Project would also comply with applicable energy efficiency/energy saving General Policies (see remarks at General Plan Policies 7.1.1, 7.2.1, 7.2.2.* *Project energy saving products (appliances, lighting features, etc.) would meet or exceed incumbent Title 24 Part 6 Energy Efficiency Standards and Title 24 Part 11 CALGreen Standards. The Project would not interfere with or obstruct*

Table 4.6-1
State and Local Energy Efficiency/Energy Conservation Plan Consistency

PLANS, POLICES, REGULATIONS	Remarks
	City efforts to reduce energy consumption through use of energy saving products and sustainable building designs. *Based on the preceding, the Project is considered consistent with Specific Plan Policy 3.1.2.*
Policy 3.2.1 Evenly dispersed and accessible mass transit stops/stations available to a wide range of customers.	**Consistent:** *This is a City-wide Policy beyond control of the Applicant. The Project would not interfere with or obstruct City efforts to provide evenly dispersed and accessible mass transit stops/stations.* *Based on the preceding, the Project is considered consistent with Specific Plan Policy 3.2.1.*
Policy 3.2.2 Interconnected non-motorized pathways that provide direct routes to mass transit, government services, and residential uses.	**Consistent:** *The Project would implement frontage sidewalk improvements facilitating pedestrian access to abutting land uses. The Project would not interfere with or obstruct City efforts to provide non-motorized pathways that provide direct routes to mass transit, government services, and residential uses.* *Based on the preceding, the Project is considered consistent with Specific Plan Policy 3.2.2.*
Policy 3.2.3 Bike racks incorporated into site design and public spaces.	**Consistent:** *The Project would provide bike racks consistent with City and CALGreen requirements.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.2.3.*
Policy 3.3.1 Promote LEED and/or CALGreen Code Tier 1/Tier 2 certification in development.	**Consistent:** *This is a City-implemented Policy beyond the purview and scope of the Project. The Project would not interfere with or obstruct City efforts to promote LEED and/or CALGreen Code Tier 1/Tier 2 certification in development.* *Based on the preceding, the Project is considered consistent with Specific Plan Policy 3.3.1.*
Policy 3.3.2 Ensure all development activities account for environmental concerns.	**Consistent:** *Consistent with CEQA requirements, potential environmental impacts of the Project have been evaluated in this RDEIR.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.3.2.*
Policy 3.3.3 Open air common space incorporated into building and site design.	**Consistent:** *Common areas would be provided if/as required by the City based on final Project site and building designs.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.3.3.*
Policy 3.3.4 Reduce energy consumption through building design.	**Consistent:** *CAP, Title 24, and CALGreen measures implemented by the Project reduce building energy*

Table 4.6-1
State and Local Energy Efficiency/Energy Conservation Plan Consistency

PLANS, POLICES, REGULATIONS	Remarks
	consumption. Final Project designs would meet or surpass incumbent Title 24 and CALGreen energy efficiency performance standards. Please refer also to remarks at Policies 3.1.2, 3.3.1. On this basis, *the Project is considered consistent with Specific Plan Policy 3.3.4.*
Policy 3.3.5 Windows with awnings.	**Consistent:** *Final Project designs would incorporate awnings or equivalent design features to reduce heat created by direct sunlight.* On this basis, *the Project is considered consistent with Specific Plan Policy 3.3.5.*
Policy 3.3.6 Incorporate energy efficient fixtures into new construction and existing sites.	**Consistent:** ***Energy efficient fixtures would be implemented consistent with or surpassing incumbent Title 24 and CALGreen requirements.*** *Please refer also to remarks at Policies 3.1.2, 3.3.1, 3.3.4.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.3.6.*
Policy 3.4.1 Incorporate water efficient fixtures into new construction and existing sites.	**Consistent:** *Water efficient fixtures will be installed consistent with or surpassing incumbent Title 24 and CALGreen requirements. Please refer also to remarks at Policies 3.1.2, 3.3.1, 3.3.4, 3.3.6.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.4.1.*
Policy 3.4.2 Install drought tolerant landscaping in all new development and modified landscape areas.	**Consistent:** *Project landscaping would conform to City landscape design standards (Municipal Code Sec. 16-3.24.030: - Landscape standards, et al.) including incorporation of water-efficient, drought tolerant landscaping features.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.4.2.*
Policy 3.4.3 Install permeable surfaces and discourage the use of materials that reduce permeability.	**Consistent:** *The Project would implement a City-approved Water Quality Management Plan (WQMP) that would act to minimize storm water pollutants of concern and document implementation of required Best Management Practices. BMPs reflected in the Project WQMP would promote use of permeable surfaces.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.4.3.*

Table 4.6-1
State and Local Energy Efficiency/Energy Conservation Plan Consistency

PLANS, POLICES, REGULATIONS	Remarks
Policy 3.4.4 Utilize reclaimed water through the installation of "purple pipe" and on- site retention basins wherever possible.	**Consistent:** *The Project would implement purple pipe for use of reclaimed water. The Project would implement a Drywell to capture and percolate treated stormwaters.* On this basis, *the Project is considered consistent with Specific Plan Policy 3.4.4.*
Policy 3.5.2 Promote the use of alternative fuel vehicles and mass transit.	**Consistent:** *This is a City-implemented Policy beyond the purview and scope of the Project. The Project would not interfere with or obstruct City efforts to promote the use of alternative fuel vehicles and mass transit.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.5.2.*
Policy 3.5.3 Provide infrastructure for the use of zero and low emissions vehicles.	**Consistent:** *CAP measures implemented by the Project include electric vehicle charging. Additionally, the Project would provide designated parking for low-emitting, fuel-efficient and carpool/van pool vehicles consistent with applicable CALGreen requirements.* *On this basis, the Project is considered consistent with Specific Plan Policy 3.5.3.*

Sources. Plan, Policy/Regulatory information from: State Energy Plan, California Code Title 24, Part 6: Energy Efficiency Standards; California Code of Regulations, Title 24, Part 11: California Green Building Standards Code (CALGreen); City of Victorville General Plan, Civic Center Community Sustainability Specific Plan. Remarks by Applied Planning, Inc.

Additionally, regulatory measures, standards, and policies directed at reducing air pollutant emissions and GHG emissions would also act to promote energy conservation and reduce Project energy consumption. Please refer to related discussions presented at RDEIR Section 4.3, *Air Quality* and RDEIR Section 4.4, *Greenhouse Gas Emissions*.

4.6.4 STANDARDS OF SIGNIFICANCE

Appendix G of the California Environmental Quality Act (*CEQA*) Guidelines indicates a Project will normally have a potentially significant effect related to energy if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.5 POTENTIAL IMPACTS AND MITIGATION MEASURES

4.6.5.1 Impact Statements

Potential Impact: *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.*

Impact Analysis:

PROJECT ENERGY DEMANDS AND ENERGY EFFICIENCY/CONSERVATION MEASURES

Estimated energy demands of Project construction and Project operations are summarized in the following discussions. Project design features and operational programs, as well as regulations that promote energy conservation end energy conservation, are also identified. The Project in total would be required to comply with incumbent performance standards established under the Building Energy Efficiency Standards contained in the California Code of Regulations (CCR), Title 24, Part 6 (Title 24, Energy Efficiency Standards). Also, developers and owners/tenants have vested financial incentives to avoid imprudent energy consumption practices. In this regard, there is growing recognition among developers and owners/tenants that efficient and sustainable construction and operational practices yield both environmental and economic benefits. On this basis, and as further supported by the following discussions, the Project would not result in or cause wasteful, inefficient, and unnecessary consumption of energy.

<u>Construction Energy Demands and Energy Efficiency/Conservation Measures</u>

Construction Energy Demands

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Project construction activity timeline

estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented at Table 4.6-2. Eight-hour daily use of all equipment is assumed. The aggregate fuel consumption rate for all construction equipment is estimated at 18.5 hp-hr-gal., obtained from CARB 2013 Emissions Factors Tables, and fuel consumption rate factors cited at Table D24 of the Moyer guidelines.[4] For the purposes of this analysis, it is assumed that all construction equipment would be diesel-powered. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region. As presented at Table 4.6-2, Project on-site construction activities would consume an estimated 2,763.34 gallons of diesel fuel. Project construction would represent a "single-event" diesel fuel/gasoline demand and would not require ongoing or permanent commitment of fuel resources for this purpose.

Table 4.6-2
Construction-Source Fuel Consumption Estimates

Activity/ Duration	Equipment	HP Rating	Quantity	Load Factor	HP-hrs./day	Total HP-hrs.	Total Fuel Consumption (gal. diesel fuel)
Site Preparation (3 days)	Rubber Tired Dozers/ Metal Track Dozers	247	3	0.40	296.4	889.2	48.06
	Tractors/Loaders/ Backhoes	97	4	0.37	143.56	430.68	23.28
Grading (21 days)	Excavators	158	1	0.38	60.04	1,260.84	68.15
	Graders	187	1	0.41	76.67	1,610.07	87.03
	Rubber Tired Dozers/ Metal Track Dozers	247	1	0.40	98.8	2074.8	112.15
	Tractors/Loaders/ Backhoes	97	3	0.37	107.67	2,261.07	122.22
Building Construction (126 days)	Cranes	231	1	0.29	66.99	8,440.74	456.26
	Forklifts	89	3	0.20	53.4	6,728.4	363.70
	Generator Sets	84	1	0.74	62.16	7,832.16	423.36
	Tractors/Loaders/ Backhoes	97	3	0.37	107.67	13,566.42	733.32

[4] *Methods to Find the Cost-Effectiveness of Funding Air Quality Projects for Evaluating Motor Vehicle Registration Fee Projects and Congestion Mitigation and Air Quality Improvement (CMAQ) Projects, Emission Factor Tables* (California Air Resources Board) May 2013; Table D24 Moyers Guidelines Fuel Consumption Rate Factors All Engines < 750 hp = 18.5 hp-hr-gal.

Table 4.6-2
Construction-Source Fuel Consumption Estimates

Activity/ Duration	Equipment	HP Rating	Quantity	Load Factor	HP-hrs./day	Total HP-hrs.	Total Fuel Consumption (gal. diesel fuel)
	Welders	46	1	0.45	20.7	2,608.2	140.98
Architectural Coating (16 days)	Air Compressors	78	1	0.48	37.44	599.04	32.38
Paving (11 days)	Cement and Mortar Mixers	9	2	0.56	10.08	110.88	5.99
	Pavers	130	1	0.42	54.6	600.6	32.46
	Paving Equipment	132	2	0.36	95.04	1,045.44	56.51
	Rollers	80	2	0.38	60.8	668.8	36.15
	Tractors/Loaders/ Backhoes	97	1	0.37	35.89	394.79	21.34
TOTAL CONSTRUCTION FUEL DEMAND (gallons diesel fuel)							**2,763.34**

Notes: Construction equipment schedules, power ratings, load factors populated from CalEEMod data presented in *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. All equipment assumed to operate 8 hours/day.

Construction Energy Efficiency/Conservation Measures

Equipment used for Project construction would conform to CARB regulations and California emissions standards, and would demonstrate related fuel efficiencies. 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.

Additionally, certain incidental construction-source energy efficiencies would likely accrue through implementation of California regulations. More specifically, California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) *Idling*, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Where feasible, indirect construction energy efficiencies and energy conservation would be achieved through the use of recycled/recyclable materials and related procedures, and energy efficiencies realized from bulk purchase, transport and use of construction materials. Use of recycled and recyclable materials and use of materials in bulk also reduces energy demands associated with preparation and transport of construction materials as transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

Construction Waste Management Plan

Consistent with Section 5.408, *Construction Waste Reduction, Disposal, and Recycling* of the California Green Building Standards Code (CALGreen Code), as adopted by the City of Victorville, the Project would recycle or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste. A Project Construction Waste Management Plan would also be prepared consistent with Section 5.408.1.1 of the CALGreen Code.

Construction Energy Demands Summary

Construction equipment used by the Project would result in single event consumption of approximately 2,763.34 gallons of diesel fuel. Diesel fuel would be supplied by City and regional commercial vendors. Construction equipment use of fuel would not be atypical for the type of construction proposed, and Project construction equipment would conform to CARB emissions standards, acting to promote equipment fuel efficiencies. CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) *Idling*, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. Where feasible, indirect construction energy efficiencies and energy conservation would be achieved through the use of recycled/recyclable materials and related procedures, and energy efficiencies realized from

bulk purchase, transport and use of construction materials. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operational Energy Demands and Energy Efficiency/Conservation Measures

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project site. With respect to estimated VMT, the Project would generate an estimated total 308,574 annual VMT along area roadways.[5] With regard to vehicle fuel economies, approximately 92 percent of the Project VMT (or 283,888 VMT) would be generated by Light/Medium Duty/or "Other" Vehicles (collectively LDVs); with the remaining approximately 8 percent (or 24,686 VMT) generated by Medium Heavy Duty, Heavy Duty, or Heavy-Heavy Duty Vehicles (collectively HDVs). Gasoline is assumed to be the primary fuel for LDVs; and diesel fuel is assumed as the primary fuel for HDVs. As presented in *Annual Energy Outlook 2015, with projections to 2040* (U.S. Energy Information Administration USEIA) April 2015, average fuel economies of LDVs are projected to improve from approximately 21.9 mpg in 2013, to approximately 37.0 mpg by 2040.[6] *Annual Energy Outlook 2015* also estimates that average fuel economies of HDVs are projected to improve from approximately 6.7 mpg in 2013, to approximately 7.8 mpg by 2040.[7] Reflecting these ranges of fuel economies, estimated Project transportation energy demands resulting from vehicle fuel consumption are

[5] Estimated VMT from: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018.
[6] "U.S. Energy Information Administration - EIA - Independent Statistics and Analysis." *Annual Energy Outlook 2015*. USEIA, 14 Apr. 2015. Web. 18 Oct. 2015.
[7] Ibid.

summarized at Table 4.6-3. Fuel demands of all vehicles accessing the Project site would be met through commercial fuel providers.

Table 4.6-3
Project-Generated Traffic Annual Fuel Consumption

Annual Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Annual Fuel Consumption (gallons)
Light Duty Vehicles		
283,888	21.9	12,963
283,888	37.0	7,673
Heavy Duty Vehicles		
24,686	6.7	3,684
24,686	7.8	3,165

Source: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018, Appendix 3.1: CalEEMod Emissions Model Outputs, p. 10.
Notes: Estimated VMT from: Average fuel economies from: *Annual Energy Outlook 2014, with projections to 2040* (U.S. Energy Information Administration, USEIA) April 2014, p. MT-14.

Facilities Energy Demands

Project building operations and Project site maintenance activities would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by Southwest Gas; electricity would be supplied to the Project by SCE. Annual natural gas and electricity demands of the Project are summarized at Table 4.6-4.

Table 4.6-4
Project Annual Operational Energy Demand Summary

Natural Gas Demand	**kBTU/year**
Auto Sales/Auto Service	371,913.0
Parking Lot	0.0
Total Natural Gas Demand	**371,913.0 kBTU/year**
Electricity Demand	**kWh/year**
Auto Sales/Auto Service	116187.0
Parking Lot	56,105.3
Total Electricity Demand	**172,292.3 kWh/year**

Source: *Victorville CarMax Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. Appendix 3.1, CalEEMod Emissions Model Outputs, pp. 11, 12.

Operational Energy Efficiency/Conservation Measures

The Project would meet or surpass standards established under the California Code Title 24, Part 6 (the California Energy Code) and California Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) as implemented by the City of Victorville. Consistent with City of Victorville General Plan Implementation Measure 7.1.1.5, the Project would be 15 percent more efficient than 2008 Title 24, Part 6: Energy Efficiency Standards.

Enhanced Vehicle Fuel Efficiencies

Estimated annual fuel consumption estimates presented previously at Table 4.6-3 represent likely potential maximums that would occur under Project Opening Year (2021) Conditions. Under future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation. Average fuel economies of vehicles accessing the Project site can also be expected to improve over time in response to fuel economy and emissions standards imposed on newer vehicles entering the transportation system.

Project Design and Access

The Project proposes auto sales and auto service uses within an urban context, proximate to, and readily accessible from regional and local roadways. In these regards, the Project's urbanized setting promotes local patronage of the proposed uses; and availability of regional and local roadways acts to facilitate access to the Project generally.

Alternative Transportation – Pedestrian, Bicycle/Multi-Use Trails, Transit Facilities

Alternative transportation modes and services available to the Project site and vicinity are described below. In combination, availability of alternative transportation modes would act to reduce fuel/energy consumption otherwise resulting from use of privately-owned vehicles.

Bus Services

The Study Area is currently served by Victor Valley Transit Authority (VVTA) Routes 200 and 52. In the vicinity of the Project, Route 200 runs along Civic Drive and Roy Rogers

Drive; Route 52 runs along Roy Rogers Drive. VVTA regularly reviews ridership demands and travel patterns to maintain convenient and efficient bus transportation within its Service Area. Current (2018) VVTA bus routes and schedules are available at: https://vvta.org/interactive-map/.

Bicycle Facilities and Pedestrian Access

The *City of Victorville Non-Motorized Transportation Plan*, June 2010, indicates a Class III bike lane along Civic Drive adjacent to the Project site (Non-Motorized Transportation Plan, p. 95, Exhibit 6.1). The Project concept does not propose or require facilities or programs that would conflict or interfere with development and implementation planned or proposed bicycle facilities. On-site Project bicycle amenities would be provided consistent with Civic Center Community Sustainability Specific Plan (Specific Plan) requirements (e.g., "Permanent bicycle racks shall be included in all new developments," Specific Plan p. 3-3). Pedestrian access would be provided by existing sidewalks along Civic Drive. All right-of-way improvements, including any temporary or interim improvements affecting Civic Drive would be designed and constructed consistent with City Conditions of Approval.

Landscaping

Drought-tolerant plants would be used where appropriate. Project landscaping would be required to conform to requirements of the Specific Plan (Table 7.2, *Professional/Commercial Development Standard*s, et al.; and the City Municipal Code (Title 16, Development Code; Article 24, *General Development Requirements and Exceptions*, et al.).

Solid Waste Diversion/Recycling

The Project would be required to comply with applicable State of California, County of San Bernardino, and City of Victorville solid waste diversion/recycling rules and regulations. These laws and regulations include but are not limited to: State AB 939, State AB 341; CALGreen Code Section 5.408, *Construction Waste Reduction, Disposal, and Recycling*; and City of Victorville Municipal Code Chapter 6.36 *Solid Waste Services*. In combination, these laws and regulations act to reduce the amount of solid waste transported to, and disposed

at area landfills. Corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations would likely result.

Operational Energy Demands Summary

Transportation Energy Demands

LDV trips and related VMT generated by the Project would result in an estimated 7,673 – 12,963 gallons of gasoline consumption per year. HDV trips and related VMT generated by the Project would result in an estimated 3,165 – 3,684 gallons of diesel consumption per year. Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are consistent with other uses of similar scale and configuration. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT. On this basis, the Project would not result in excess and wasteful vehicle energy consumption.

Enhanced fuel economies resulting from federal and state regulatory actions, and transition of vehicles to alternative energy sources (e.g., electricity, natural gas, bio fuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT.

The Project would also implement sidewalks, pedestrian paths, and bicycle amenities encouraging pedestrian and bicycle access. The Project would not interfere or conflict with existing or proposed pedestrian or bicycle facilities.

Bus stop facility recommendation(s) provided by VVTA are recognized. As part of the City's standard development review process, the need for and appropriateness of transit-related facilities including, but not limited to, bus shelters would be coordinated between the City and the Project Applicant, with input from VVTA.

Facilities Energy Demands

Project facility operational energy demands are estimated at 371,913.0 kBTU/year natural gas and 172,292.3 kWh/year electricity. Natural gas would be supplied to the Project by

Southwest Gas; electricity would be supplied by SCE. The Project proposes conventional development types, reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other similar projects of like scale and configuration.

The Project would be required to comply with incumbent Title 24 energy efficiency mandates. Project energy demands are further reduced through compliance with CALGreen standards and requirements, and City Ordinance requirements.

Based on the preceding, Project facilities energy demands and energy consumption would not be inefficient, wasteful, or otherwise unnecessary.

CONCLUSION

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy, and potential Project impacts in these regards would be less-than-significant. Further, energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy-producing or energy transmission facilities and would not create or otherwise result in a potentially significant impact affecting energy resources or energy delivery systems.

As supported by the preceding discussions, the potential for the Project to result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation is considered less-than-significant.

Level of Significance: Less-Than-Significant.

Potential Impact: *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

Impact Analysis: Consistency of the Project with state or local plan for renewable energy or energy efficiency is summarized at previous Table 4.6-1. As substantiated at Table 4.6-1, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The potential for the Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency is therefore considered less-than-significant.

Level of Significance: Less-Than-Significant.

5.0 OTHER CEQA CONSIDERATIONS

5.0 OTHER CEQA CONSIDERATIONS

This Section of the RDEIR addresses other environmental considerations and topics mandated under the California Environmental Quality Act (CEQA). These topics include Cumulative Impacts, Alternatives to the Project, Growth Inducement, Significant Environmental Effects of the Project, and Significant and Irreversible Environmental Changes.

5.1 CUMULATIVE IMPACT ANALYSIS

The *CEQA Guidelines* require that an EIR identify any significant cumulative impacts associated with a project [*CEQA Guidelines*, Section 15130(a)]. When potential cumulative impacts are not deemed significant, the document should explain the basis for that conclusion. Cumulative impacts are "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." [*CEQA Guidelines*, Section 15355]. Thus, a legally adequate cumulative impact analysis is an analysis of a given project viewed over time and with other related past, present, and foreseeable probable future projects, whose impacts might compound or interrelate with those of the Project considered here.

CEQA notes that the discussion of cumulative impacts should be guided by standards of practicality and reasonableness [*CEQA Guidelines*, Section 15130(b)]. Only those projects whose impacts might compound or interrelate with those of the Project under consideration require evaluation. CEQA does not require as much detail in the analysis of cumulative environmental impacts as must be provided for the Project alone.

The *CEQA Guidelines* identify two basic methods for satisfying the cumulative impacts analysis requirement: the list-of-projects methodology, and the summary-of-projections methodology. Because each environmental resource is affected by its surroundings in

different manners, either of the two methodologies, or a combination of both, may be applied to the analysis of cumulative impacts to each resource. For example, because the approval process and construction phase of development typically takes at least one to two years, the list-of-projects method is likely to provide a more accurate projection of growth in the near term. This method may overstate potential cumulative impacts because the considered list-of-projects may include proposals that would never be developed. Similarly, because development proposals are rarely publicly known until within five years of the expected development, the summary-of-projections method provides a more accurate projection of growth over the long term. This method may not accurately predict growth in any given year but aggregates various growth trends over the long term.

For each topical discussion, the cumulative geographic context is identified which in turn relates to the amount and type of growth that is anticipated to occur within the geographic area under consideration. Where appropriate to the analysis in question, cumulative impacts are assessed with reference to a list of off-site "related projects," as described at *CEQA Guidelines* §15130(b). In this manner, the RDEIR appropriately characterizes and evaluates potential cumulative impacts.

Consistent with direction provided in the *CEQA Guidelines,* related projects considered in these cumulative analyses are "only those projects whose impacts might compound or interrelate with those of the Project under consideration require evaluation." In this regard, it is recognized that within the context of the cumulative impacts analysis, varied criteria are employed in determining the scope and type of "cumulative projects" considered. For example, the analysis of cumulative traffic impacts evaluates the Project's traffic impacts in the context of other known or probable "related" development proposals that would discernibly affect traffic conditions within the Traffic Impact Analysis Study Area. As another example, cumulative air quality impacts are considered in terms of the Project's contribution to other air emissions impacts affecting the encompassing Air Basin.

The manner in which each resource may be affected also dictates the geographic scope of the cumulative impacts analysis. For example, cumulative traffic impacts would typically be localized to the vicinity of a given project site because, after a relatively short distance, traffic patterns tend to normalize; whereas cumulative air quality impacts are more appropriately analyzed with a Basin-wide approach because the Basin's meteorological and geographic conditions generally define the extent of cumulative air quality considerations. Similar considerations are discussed in evaluating potential cumulative impacts for each of the RDEIR's environmental topics (Land Use and Planning, Transportation, Air Quality, Greenhouse Gas Emissions, Noise, and Energy).

5.1.1 DISCUSSION OF CUMULATIVE IMPACTS

Unless otherwise noted herein, the cumulative impact analysis ultimately evaluates effects of the Project within the context of anticipated buildout of the City as envisioned under the General Plan and related regional plans. Specific cumulative projects have also been identified where this information may be different, more detailed than that provided within the General Plan or applicable regional plans, or where such specific information otherwise benefits the cumulative impact analyses.

Section 15130(a) of the *CEQA Guidelines* notes that,

> " . . . an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3). Where a lead agency is examining a project with an incremental effect that is not 'cumulatively considerable,' a lead agency need not consider that effect significant but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable."

Potential cumulative impacts for each of the RDEIR's environmental topics are presented below and include:

- Land Use and Planning;
- Transportation;

- Air Quality;
- Greenhouse Gas Emissions;
- Noise; and
- Energy.

For other topical areas of consideration, Project impacts are substantiated to be less-than-significant or less-than-significant as mitigated (please refer to the Initial Study, RDEIR Appendix A). Further, under these topics, there are no known or anticipated projects or conditions whose impacts might compound or interrelate with those of the Project, and thereby result in potentially significant cumulative impacts. No further substantive analysis is provided under these topics. These topics include:

Aesthetics

- Have a substantial adverse effect on a scenic vista;

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

- In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings;

- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Agriculture and Forest Resources

- Conversion of 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;

- Conflict with existing zoning for agricultural use, or a Williamson Act contract;

- Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned "Timberland Production;"

- Result in the loss of forest land or conversion of forest land to non-forest use; or

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Air Quality

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Biological Resources

- Potential to 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 Game or U.S. Fish and Wildlife Service;

- Potential to 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 U.S. Fish and Wildlife Service;

- Potential to have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

- Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;

- Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Cultural Resources

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;

- Disturb any human remains, including those interred outside of formal cemeteries.

Geology and Soils

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
    - Rupture of a known earthquake fault;
    - Strong seismic ground shaking;
    - Seismic-related ground failure, including liquefaction; or
    - Landslides.

- Result in substantial soil erosion or the loss of topsoil;

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property;

- 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;

- Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Hazards and Hazardous Materials

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment;

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

- 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, create a significant hazard to the public or the environment;

- 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, result in a safety hazard or excessive noise for the people residing or working in the project area;

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Hydrology and Water Quality

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin;

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

    - Result in substantial erosion or siltation on- or off-site;

    - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

    - Create or contribute runoff water that would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

  - Impede or redirect flood flows;

- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Land Use and Planning

- Physically divide an established community.

Mineral Resources

- Result in the loss of availability of a known mineral resource that would be of value to the region and to the residents of the state;

- 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.

Noise

- 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, expose people residing or working in the project area to excessive noise levels.

Population and Housing

- Induce substantial unplanned population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure); and

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Public Services

- 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 fire protection, police protection, schools, parks, or other public facilities.

Recreation

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration of the facility would occur or be accelerated;

- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Tribal Cultural Resources

- Cause a substantial adverse change in the significance of a tribal cultural resource that is:

    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources; or

    - That is otherwise substantiated by the lead agency to be significant.

Utilities and Service Systems

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;

- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;

- 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;

- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals;
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Wildfire

- Substantially impair an adopted emergency response plan or emergency evacuation plan;

- 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;

- 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; or

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Please refer also to RDEIR Section 1.7, *Impacts Not Found to be Potentially Significant*.

5.1.1.1 Cumulative Impacts Related to Land Use and Planning

The cumulative impact area when considering potential cumulative land use and planning issues includes areas that are currently, or are anticipated to be, subject to provisions of the City of Victorville General Plan, Zoning Ordinance, and/or Special Planning Documents (e.g., Specific Plans). The cumulative impact area includes incorporated areas of the City of Victorville and the City of Victorville Sphere of Influence.

General Plan and Zoning Considerations

The Project site General Plan Land Use designation is "Commercial." The Project site Zoning designation is "Specific Plan." The Project site is located within the Civic Center Community Sustainability Specific Plan. Existing Project site General Plan Land Use and Zoning designations are presented at RDEIR Section 3.0, *Project Description*, Figure 3.4-1.

The Civic Center Community Sustainability Specific Plan (Specific Plan), adopted in 2016, encompasses approximately 473 acres located in the central portion of the City of Victorville. The Specific Plan contains four District types: Commercial, Business, Government/Service, and Mixed-Use. The Project site is located in the Specific Plan Civic Commercial District (CC-2) land use designation. The Project site's existing CC-2 land use designation does not permit or conditionally permit used vehicle sales as proposed by the Project.

To implement the Project, the Applicant has requested a Specific Plan Amendment (SPA) to conditionally permit used vehicle sales within the CC-2 designation. The requested SPA also provides that the minimum net lot area for used vehicles sales be 4.5 acres. The Project site's existing General Plan Land Use designation (Commercial) and Zoning designation (Specific Plan) would be maintained.

The Project is consistent with, and appropriately responds to, applicable General Plan Goals and Policies for the Project site's existing General Plan Land Use designations. The Project would conform to applicable provisions of the Specific Plan as amended under the Project.

The City comprehensively updates and amends General Plan and Zoning documents to reflect cumulative land use changes within the impact area. Regional agencies employ development-specific information and General Plan/Zoning information provided by the City in developing regional plans and growth projections. In combination, these actions ensure that potential cumulative effects of evolving land use plans are appropriately addressed at local and regional levels. Compliance with the applicable land use plans is discussed at RDEIR Section 4.1, *Land Use and Planning*.
Based on the preceding discussions, the Project's contributions to potential cumulative land use and planning impacts is not considerable, and the cumulative effects of the Project would be less-than-significant.

Other development projects within the cumulative impact area would incorporate, and would be required to comply with requirements of necessary land use and planning discretionary actions and permits, acting to preclude or minimize potential land use and planning impacts.

Summary

The Project land uses, development concepts, and operations conform to all governing land use plans, regulations and development standards. The Specific Plan Amendment proposed by the Project would be reflected in the Civic Center Community Sustainability Specific Plan documents. The Project would not conflict with or obstruct relevant local

and regional plans. The Project's contributions to potential cumulative land use and planning impacts is therefore not considerable, and the cumulative effects of the Project would be less-than-significant.

Other related projects within the cumulative impact area would incorporate mitigation if applicable, and would be required to comply with requirements of necessary land use and planning discretionary actions and permits. This would act to preclude or minimize potential land use and planning impacts. On this basis, with respect to land use and planning, impacts of the Project in combination with impacts of other related projects within the cumulative impact area would be less-than-significant.

5.1.1.2 Cumulative Impacts Related to Transportation

Cumulative VMT Impacts

As provided for in *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Office of Planning and Research [OPR) December 2018 (Technical Advisory) "[a] project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa" (Technical Advisory, p. 6). A substantiated herein, Project-level VMT impacts would be less-than-significant. Per the OPR Technical Advisory guidance presented above, the Project cumulative VMT impacts would also be less-than-significant.

Cumulative LOS Deficiencies

As discussed herein, LOS deficiencies are not significant environmental impacts under CEQA. The discussions of LOS deficiencies presented in this EIR are presented for City use and informational purposes only.

The cumulative impact area for LOS deficiencies is defined by the Traffic Impact Study Area (Study Area), as described in *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019 (Project TIA, TIA).

The TIA Study Area (illustrated at RDEIR Section 4.2, *Transportation* Figure 4.2-1) includes potentially affected facilities under the jurisdiction of the City of Victorville and all potentially affected Caltrans and Congestion Management Program facilities.

The Project TIA comprehensively reflects anticipated cumulative traffic increases affecting the Study Area and addresses related potential cumulative traffic impacts. Consistent with direction provided by the Lead Agency, future year traffic forecasts reflect an annual growth rate of 2.0 percent per year, approximating regional traffic growth.

To establish the basis for likely near-term (Opening Year) cumulative LOS deficiencies ambient background traffic growth, and traffic generated by the development of known or probable related projects were added to existing daily and peak hour traffic volumes on Study Area roadways. Certain of the identified cumulative projects have been approved by the applicable governing agency, and not all would be completed prior to the Project's anticipated opening in 2021. Nonetheless, the TIA conservatively assumes that all cumulative related projects would be complete, fully occupied, and generating traffic by the Project Opening Year. Related projects are identified at Table 5.1-1.

Table 5.1-1
TIA Cumulative Projects

City Case No./Project Name	Land Use	Metric
TT-05-047/ Tract 17531, Rancho Tierra Specific Plan	Single Family Residential	288 Dwelling Units
TT-05-046/ Tract 17530, Rancho Tierra Specific Plan	Single Family Residential	165 Dwelling Units
TT-05-026/ Tract 17111 V, West Creek Specific Plan	Single Family Residential	171 Dwelling Units

Source: *Traffic Impact Analysis, CarMax, City of Victorville* (Michael Baker International) June 3, 2019.

Cumulative traffic volumes under Horizon Year Conditions were derived by increasing Opening Year traffic volumes by 2 percent annually for the period 2021 – 2031.

City Conditions of Approval address Project-level and cumulative LOS deficiencies. The Project would comply with these Conditions of Approval.

All other Project transportation impacts would be individually and cumulatively less-than-significant.

5.1.1.3 Cumulative Impacts Related to Air Quality

The cumulative impact area for air quality considerations is generally defined by the encompassing Air Basin and boundaries of the jurisdictional air quality management agency. In this case, the Mojave Desert Air Basin (Basin) and the Mojave Desert Air Quality Management District (MDAQMD) respectively. Project air pollutant emissions within the context of MDAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts in the Basin. Due to the defining geographic and meteorological characteristics of the Basin, criteria pollutant emissions that could cumulatively impact air quality would be, for practical purposes, restricted to the Basin. Accordingly, the geographic area encompassed by the Basin is the appropriate limit for the cumulative Air Quality analysis.

Construction-source Air Quality Impacts

Project construction-source air pollutant emissions would not exceed applicable MDAQMD regional thresholds and would be less-than-significant. Less-than-significant impacts at the Project level are not cumulatively considerable. [1]

Project would construction equipment would incorporate current emissions control technologies. Project construction equipment and equipment operations would be required to comply with applicable MDAQMD permitting requirements and

[1] The MDAQMD relies on South Coast Air Quality Management District (SCAQMD) guidance in evaluation of the significance of cumulative impacts. The SCAQMD recognizes that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple independent projects because each project applicant has no control over other projects. Per SCAQMD criteria, development proposals that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

construction emissions control measures and rules. In combination, these measures would minimize Project construction-source emissions contributions to cumulative air quality impacts. Further, the Project would conform to and implement applicable provisions of the Western Mojave Air Quality Management Plans (MDAQMD AQMPs). The MDAQMD AQMPS are intended to bring the Basin into attainment for all criteria pollutants, thereby reducing cumulative impacts of air pollutant emissions to levels that would be less-than-significant.

Other related projects within the cumulative impact area would be required to minimize construction-source air pollutant emissions consistent with MDAQMD programs and strategies, thereby minimizing potential cumulative air quality impacts within the Basin. Mitigation would be implemented, if applicable.

Based on the preceding, the potential for Project construction-source air pollutant emissions to result in or cause cumulatively significant regional air quality impacts is considered less-than-significant.

Operational-source Air Quality Impacts

Project operational-source air pollutant emissions would not exceed applicable MDAQMD regional thresholds and would be less-than-significant. The Project would incorporate contemporary energy-efficient technologies and operational programs, and would be required to comply with MDAQMD emissions reductions measures and rules. In combination, these measures would minimize Project operational-source emissions contributions to cumulative air quality impacts. Further, the Project would conform to and implement applicable provisions of the MDAQMD AQMPs. The MDAQMD AQMPs are intended to bring the Basin into attainment for all criteria pollutants, thereby reducing cumulative impacts of Basin air pollutant emissions to levels that would be less-than-significant. Less-than-significant impacts at the Project level are not cumulatively considerable.

Other related projects within the cumulative impact area would be required to minimize operational-source air pollutant emissions consistent with MDAQMD programs and

strategies, thereby minimizing potential cumulative air quality impacts within the Basin. Mitigation would be implemented, if applicable.

Based on the preceding, the potential for Project operational-source air pollutant emissions to result in or cause cumulatively significant regional air quality impacts is considered less-than-significant.

Impacts at Sensitive Receptors

As stated in the MDAQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines *(MDAQMD Guidelines),* the following project types located within a specified distance to an existing or planned sensitive receptor land use must be evaluated to determine exposure of substantial pollutant concentrations to sensitive receptors:

- 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;
- A gasoline dispensing facility within 300 feet.

[MDAQMD Guidelines, p. 8]

The Project does not include any of the above uses. As such, per MDAQMD criteria, there is no requirement to evaluate the potential for the Project to expose sensitive receptors to substantial pollutant concentrations. Further, the Project does not otherwise propose or require uses or operations that would generate substantive pollutant concentrations that would potentially affect sensitive receptors; nor are there any sensitive receptors located near the Project site – the sensitive receptor nearest the Project site is a residential community located approximately 530 feet to the north.

Based on the preceding, the potential for the Project to individually or cumulatively result in exposure of sensitive receptors to substantial pollutant concentrations is considered less-than-significant.

Nonattainment Impacts

The Project is located within ozone and $PM_{10}/PM_{2.5}$ nonattainment areas (NO_x is a precursor to ozone and $PM_{10}/PM_{2.5}$). Project, construction-source and operational-source and emissions would not exceed any MDAQMD thresholds. Further, the Project would conform to and implement applicable provisions of the MDAQMD AQMPs acting to minimize Project contributions to existing nonattainment impacts. On this basis, Project contributions to nonattainment impacts would be less-than-significant. Less-than-significant impacts at the Project level are not cumulatively considerable.

Based on the preceding, the potential for Project air pollutant emissions to result in or cause cumulatively significant nonattainment impacts is considered less-than-significant.

Air Quality Management Plan (AQMP) Consistency Impacts

The Project would comply with and would not conflict with applicable the MDAQMD AQMPs air pollution control measures and reduction strategies. Project compliance with air pollution control measures and support of air pollution reduction promotes timely attainment of MDAQMD AQMPs air quality standards. The potential for the Project to conflict with the MDAQMD AQMPs is therefore less-than-significant. Projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Based on the preceding, the potential for Project air pollutant emissions to result in or cause cumulatively significant AQMD consistency impacts is considered less-than-significant.

CO Hotspot Impacts

The potential for the Project to cause or result in potential CO hotspot impacts would be less-than-significant. Less-than-significant impacts at the Project level are not cumulatively considerable. Based on the preceding, the potential for Project CO emissions to result in or cause cumulatively significant CO hotspot impacts is therefore considered less-than-significant.

Summary

- Project construction-source emissions would not exceed applicable MDAQMD regional thresholds and would not be cumulatively considerable or cumulatively significant.

- Project operational-source emissions would not exceed applicable MDAQMD regional thresholds and would not be cumulatively considerable or cumulatively significant.

- Project construction-source and operational-source emissions would not result in a cumulatively considerable net increase in criteria pollutants (ozone and PM_{10}/$PM_{2.5}$) for which the Project region is non-attainment. The Project would not result in or cause cumulatively considerable or cumulatively significant nonattainment impacts.

- The Project would be consistent with the MDAQMD AQMPs. The Project would not result in or cause cumulatively considerable or cumulatively significant AQMP consistency impacts.

- All other potential air quality impacts of the Project would be less-than-significant. Less-than-significant impacts at the Project level are not cumulatively considerable.

- Other related projects within the cumulative impact area would be required to minimize air pollutant emissions consistent with MDAQMD programs and strategies, thereby minimizing potential cumulative air quality impacts within the Basin. Mitigation would be implemented, if applicable.

5.1.1.4 Cumulative Impacts Related to GHG Emissions

CEQA emphasizes that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (*CEQA Guidelines* Section 15130(f)). The Project Greenhouse Gas (GHG)

Analysis is by nature a cumulative analysis. Because GHG emissions and climate change are a global issue, any approved project regardless of its location has the potential to contribute to a cumulative global accumulation of GHG emissions. The geographic context of the cumulative contributions to GHGs and climate change is worldwide. Practically however, lead agencies and responsible agencies are only able to regulate GHG emissions within their respective jurisdictions. Accordingly, for the purposes of this analysis, the cumulative impact area for GHG/Global Climate Change considerations is the City of Victorville and the encompassing MDAQMD jurisdictional area.

Consistent with *CEQA Guidelines* direction, the Project GHG Analysis and this RDEIR evaluate Project GHG emissions under the following topical headings:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment;

- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The City has further determined that each of the above thresholds establish a separate and independent basis upon which to substantiate the significance of the Project's potential GHG emissions impact. Project impacts within the context of the above threshold considerations are evaluated in the following discussions.

The Project would conform to applicable provisions of the City of Victorville Climate Action Plan (CAP). RDEIR Mitigation Measure 4.4.1 ensures the timely and monitored implementation of applicable CAP provisions. Additionally, the nominal Project GHG emissions (303.32 MTCO2e/year) do not meet or even approach threshold conditions (CAPCOA: 900 MTCO2e/year; SCAQMD: 3,000 MTCO2e/year; MDAQMD: 100,000 tons/year; 548,000 pounds/day). The Project presumptively would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Based on the preceding, the potential for the Project to generate GHG emissions that would either directly or indirectly have a significant impact on the environment, both individually and cumulatively, would be less-than-significant.

The Project would be consistent with the City of Victorville's adopted CAP since it would achieve the required minimum 45 points per the City's Screening Tables. Moreover, because the Project GHG emissions would not exceed the applicable SCAQMD threshold of 3,000 MTCO2e/year, the Project is not considered to directly or indirectly generate significant GHG emissions.

The Project would not otherwise interfere with any existing or future City-mandated, state-mandated, or federally-mandated obligations enacted or promulgated to legally require development projects to assist in meeting state-adopted greenhouse gas emissions reduction targets, including those proposed or established by: CARB, State implementation of (i) Executive Order B30-15 and SB 32's target of reducing statewide GHG emissions to 40% below 1990 levels by 2030 ; or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80% below 1990 levels by 2050. These measures are reflected in the CARB 2008 Scoping Plan, and the CARB 2017 Scoping Plan.

Based on the preceding, the potential for the Project to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases is therefore less-than-significant and not cumulatively considerable.

Other related projects within the cumulative impact area would be required to demonstrate compliance with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and implement mitigation, if applicable.

Summary

The Project would comply with the City of Victorville CAP and would not be a substantive source of GHG emissions. Quantified Project GHG emissions impacts would be less-than-significant and would not be cumulatively considerable or cumulatively

significant. Other related projects would be required to demonstrate compliance with the City CAP and implement mitigation, if applicable.

The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and would therefore be less-than-significant and not cumulatively considerable. Other related projects would be required to demonstrate compliance with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and implement mitigation, if applicable. On this basis, with respect to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, impacts of the Project in combination with impacts of other related projects within the cumulative impact area would be less-than-significant.

5.1.1.5 Cumulative Impacts Related to Noise

The cumulative impact area for noise considerations is generally defined as surrounding properties that could receive Project-generated noise (either construction-source or operational-source), and would also include roadway corridors affected by Project-related traffic and associated vehicular noise. Potential noise impacts of the Project are discussed at RDEIR Section 4.5, *Noise*.

Construction-Source Noise

Project construction-source noise would not exceed applicable thresholds, and would not result in or contribute to ambient conditions and thereby resulting in cumulatively significant noise impacts. Other planned and approved projects would be required to mitigate construction-source noise impacts that could affect sensitive receptors.

Operational Noise-Area Sources

Project operational noise from area sources would not exceed applicable thresholds. Noise levels resulting from Project operations would not substantively contribute to ambient noise conditions or to other related noise sources. Project operational area-source noise would therefore not result in or cause cumulatively significant noise impacts. Other

planned and approved projects would be required to conform to City standards. Mitigation would be implemented, if applicable.

Operational Noise-Mobile Sources

Maximum cumulative effects of vehicular (mobile-source) noise are demonstrated by comparing noise levels under Existing Conditions (2018) and Horizon Year Conditions (2031). Noise contours for Study Area roadway segments are based on roadway average daily trip (ADT) estimates, Project trip generation, and trip distribution as presented in the Project TIA. Per the Federal Interagency Committee on Noise (FICON)[2] guidance discussed at RDEIR Section 4.5, *Noise*, when ambient noise conditions are less than 60 dBA CNEL and cumulative effects of vehicular-source noise would be readily perceptible (≥ 5 dBA CNEL), cumulative vehicular-source noise impacts would be considered potentially significant. When ambient baseline conditions approximate 60 – 65 dBA CNEL and subsequent increases in noise levels would be barely perceptible (≥ 3 dBA CNEL) cumulative vehicular-source noise impacts would be considered potentially significant. When ambient baseline conditions exceed 65 dBA CNEL increases in noise levels of ≥ 1.5 dBA CNEL would be considered potentially significant.

As indicated at Table 5.1-2, the maximum cumulative noise increases along roadways within the Study Area over the considered 13-year cumulative time frame would range from 1.0 dBA CNEL to 1.1 dBA CNEL. Maximum incremental effect of Project vehicular-source noise would be 0.1 dBA. In all instances, the total cumulative vehicular-source noise impact and the Project's incremental contributions to vehicular-source noise impacts along the affected roadway segments would be less than 1.5 dBA and would therefore not be cumulatively considerable.

[2] *Federal Agency Review of Selected Airport Noise Analysis* (Federal Interagency Committee on Noise) 1992.

Table 5.1-2
Cumulative Vehicular-Source Noise

Roadway	Segment	CNEL at Affected Property Line				
		Existing	2031 w/o Project	2031 With Project	Max. Cumulative CNEL Increase	Max. Project Increment
Civic Dr.	n/o Site Driveway #2	68.8	69.8	69.9	1.1	0.1
Civic Dr.	n/o Site Driveway #1	67.4	68.5	68.5	1.1	0.0
Civic Dr.	s/o Site Driveway #1	67.4	68.4	68.4	1.0	0.0
Roy Rogers Dr.	e/o Amargosa Rd.	69.3	70.4	70.4	1.1	0.0
Roy Rogers Dr.	w/o I-15 SB Ramps	71.0	72.1	72.1	1.1	0.0
Roy Rogers Dr.	w/o I-15 NB Ramps	72.4	73.5	73.5	1.1	0.0
Roy Rogers Dr.	e/o 1-15 NB Ramps	69.2	70.3	70.3	1.1	0.0

Source: *Victorville CarMax, Noise Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 24, 2018.
Notes: e/o = east of; w/o = west of; n/o = north of; s/o = south of.

Summary

- Project construction-source noise levels received at nearby properties would not exceed applicable thresholds and would not be individually or cumulatively significant.

- Other related projects within the cumulative impact area would be required to conform to City construction-source noise standards. Mitigation would be incorporated if applicable. On this basis, with respect to construction-source noise, impacts of the Project in combination with impacts of other related projects within the cumulative impact area would be less-than-significant.

- Project operational area-source noise levels received at nearby properties would not exceed applicable thresholds and would not be individually or cumulatively significant.

- Other related projects within the cumulative impact area would be required to conform to City operational-source noise standards. Mitigation would be incorporated if applicable. On this basis, with respect to operational area-source

noise, impacts of the Project in combination with impacts of other related projects within the cumulative impact area would be less-than-significant.

- Noise increases along all Study Area roadway segments would not be cumulatively significant over the time frame 2018 – 2031. In all instances, the Project's incremental contributions along the affected roadway segments would be less than 1.5 dBA and would therefore not be cumulatively considerable.

5.1.1.6 Cumulative Impacts Related to Energy

The geographic scope of cumulative energy impacts is generally limited to the energy provider service area(s). The analysis at RDEIR Section 4.6, *Energy* substantiates that the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. These plans and policies address development-level and cumulative impacts to energy resources. Project consistency with state and local plans for renewable energy and energy efficiency demonstrates that the Project cumulative energy impacts would not be cumulatively considerable and the Project cumulative energy impacts would be less-than-significant. As with the Project, other developments within the energy provider service areas would be required to demonstrate compliance with state and local plans for renewable energy and energy efficiency.

5.2 ALTERNATIVES ANALYSIS

5.2.1 Alternatives Overview

Consistent with provisions of the *CEQA Guidelines*, this RDEIR evaluates alternatives to the Project that would lessen its significant environmental effects while allowing for attainment of the basic Project Objectives. In the case of the Project, all environmental impacts would be less-than-significant, or less-than-significant as mitigated. The following Alternatives Analysis is provided for illustrative and informational purposes.

Alternatives to the Project considered in detail within this analysis include:

- No Project Alternative;
- Reduced Intensity Alternative; and
- Alternative Sites.

These Alternatives are described in greater detail in Section 5.2.2, *Description of Alternatives*. To provide context for the subsequent consideration of Alternatives, Project Objectives are listed below.

Project Objectives

The primary goal of the Project is the redevelopment of the subject site with a car dealership use that responds to local and regional car sales market demands. Supporting objectives of the Project include the following:

- Transition and repurpose the subject site to a useful productive commercial auto dealership and services facility. Benefits would include new sales tax revenues and increased property tax revenues available to the City of Victorville.

- Preserve and enhance visual attributes of the Project site.

- Provide car dealership sales and service facilities that are responsive to community needs and that are compatible with proximate land uses.

- Take advantage of access and visual recognition provided by the Project site's adjacency to the I-15 freeway.

- Implement employment-generating land uses that would create new jobs available to City residents.

- Take advantage of available infrastructure.

5.2.2 Description of Alternatives

Alternatives to the Project that are considered in this analysis are described below.

5.2.2.1 No Project Alternative Overview

The *CEQA Guidelines* specifically require that an EIR include evaluation of a No Project Alternative. The No Project Alternative should make a reasoned assessment as to future disposition of the subject site should the Project under consideration not be developed. In this latter regard, the *CEQA Guidelines* state in pertinent part:

> "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (*CEQA Guidelines*, Section 15126.6 (e)(3)(b))."

In the case considered here, the subject site is a vacant and available property absent any significant environmental or physical constraints. Further, the Project area is fully served by proximate available utilities and supporting public services; and is provided appropriate access. Areas around the subject site are developed with or are being developed with urban uses. The Project area is not substantively constrained by physical conditions or environmental considerations.

Given the availability of infrastructure/services, lack of environmental or physical constraints; and proximity of other urban development, it is considered unlikely that the subject site would remain vacant or in a "No Build" condition. Evaluation of a No Build condition would therefore "analyze a set of artificial assumptions that would be required to preserve the existing physical environment." This is inconsistent with direction provided at *CEQA Guidelines*, Section 15126.6 (e)(3)(b), as presented above. On this basis, a No Build condition is not evaluated as a potential RDEIR No Project Alternative.

Evaluated No Project Alternative

In light of the preceding discussions, for the purposes of this Alternatives Analysis, and to provide for analysis differentiated from the Project, the No Project Alternative considered herein assumes development of the Project site allowed under the site's current General Plan Land Use and Zoning designations. Under the No Project Alternative, it is assumed that the entire 4.76-acre Project site would be developed with commercial uses currently allowed under the Civic Center Community Sustainability Specific. For the purposes of this Alternatives Analysis, the site is assumed to be developed with general retail merchandise uses at a mid-range development intensity (assumed at a 0.25 floor-to-area ratio [FAR]) allowed under the Specific Plan CC-2 District.[3] Translated over the entire 4.76-acre site, this would yield approximately 51,800 square feet of commercial development under the No Project Alternative.

The No Project Alternative would increase LOS deficiencies, air quality impacts, GHG emissions impacts, and vehicular-source noise impacts when compared to the Project. Impacts under the No Project Alternative, though increased when compared to the Project, would likely be less-than-significant or could be mitigated to levels that would be less-than-significant.

[3] The CC-2 District allows development at up to 0.50 FAR.

5.2.2.2 Reduced Intensity Alternative Overview

For purposes of the RDEIR Alternatives Analysis, the Reduced Intensity Alternative is based on an overall reduction in Project trip generation of 25 percent. To achieve the 25 percent reduction in trip generation, the scope of Project uses could be reduced, and/or the types and variety of occupancies proposed by the Project could be modified. The Reduced Intensity Alternative would further diminish other already less-than-significant impacts otherwise occurring under the Project.

5.2.2.3 Alternative Sites

As discussed in the body of this RDEIR, the Project would not result in any significant environmental effects. An overview of the Project potential effects if located at an alternative site is nonetheless presented here for illustrative and informational purposes.

Project Site Selection Background

Prior to the Applicant's selection of the current Project site, several other sites were considered as potential locations of the Project. More specifically, prior to CarMax contracting for the current location, 5 other locations were toured during June 2017. Three of the sites considered were in Hesperia near the intersection of I-15 and Main Street. The potential Hesperia sites were dismissed as they were too far removed (8 miles) from the main cluster of auto dealers and regional retail located in the City of Victorville. Local consultants advised that the City of Victorville was the regional hub for retail shopping and automotive dealers for the High Desert Valley, meaning that Victorville attracted patrons from the City of Hesperia. However, Victorville shoppers had little incentive to travel to and shop in Hesperia because the offerings in this more distant municipality were essentially the same as those locally available. On this basis, the Applicant eliminated the City of Hesperia as a potential location for the Project.

Alternative Sites Analysis

Overview

Three possible alternative sites for the Project are identified. The locations of these sites are presented in Figure 5.2-1, *Overview of Alternative Sites*. Initial evaluation of the

considered sites indicated that they would be unsuitable or infeasible based on basic screening criteria deficiencies including, but not limited to: a) existing impediments or encumbrances; b) no demonstrable reduction in environmental impacts when compared to the current Project site; or c) potential increased environmental impacts when compared to the current Project site. On this basis, potential alternative locations for the Project are considered infeasible.

Site Selection Criteria

Consistent with the Project Objectives and general feasibility criteria, an Alternative Site would be considered potentially viable if it:

- Would take advantage of access and visual recognition provided by adjacency to the I-15 freeway;
- Would allow for implementation of a commercial auto dealership sales and service facility that is responsive to community needs and compatible with proximate land uses;
- Would allow for development that would preserve and enhance area visual attributes;
- Would allow for implementation of employment-generating land uses that would create new jobs available to City residents;
- Was currently available;
- Could feasibly be configured at an appropriate size (minimum of 4.5 acres); exhibited appropriate General Plan and Zoning designations or could be feasibly so-designated; and
- Was provided, or could feasibly be provided, adequate serving utilities and infrastructure.

N

NOT TO SCALE

Source: Google Earth; Applied Planning, Inc.

applied planning inc

Figure 5.2-1
Overview of Alternative Sites

Alternative Site Evaluations

Alternative Site No. 1 comprises approximately 6 acres (APNs 3106-261-12, -13) located southwesterly of Civic Drive (N – S) at Valley Park Lane (E – W). Alternative Site No. 1 is designated "Civic Auto Park" under the CCCSP. Used auto sales, such as is proposed by the Project is not permitted as a primary occupancy under the CCCSP Auto Park land use designation. A land use amendment from Civic Auto Park to "Community Commercial," and approval of a Conditional Use Permit would be required to allow development of the Project used automobile facilities at Alternative Site No. 1. As summarized below, development of the Project at Alternative Site No. 1 would diminish attainment of the Project Objectives, and could result in significant environmental impacts not occurring at the current Project site. Further, the proponent cannot reasonably acquire, control, or otherwise have access to Alternative Site No. 1.

Attainment of Certain Project Objectives Diminished or Precluded

Alternative Site No. 1 is approximately 0.3 miles distant from the I-15 corridor, and views of the site are obstructed by intervening development. In this respect, Alternative Site No. 1 would diminish or preclude attainment of the Project Objective to "take advantage of access and visual recognition provided by adjacency to the I-15 freeway."

Potential to Result in New or Additional Significant Impacts

Aerial photography of Alternative Site No. 1 indicates that the site is vacant and undeveloped and is likely suitable for development. However, significant site-based considerations and constraints (e.g., biological resources, cultural resources, geology and soils, hydrology and water quality) may exist. These factors could either result in significant impacts not resulting from the Project at its current location, could substantively restrict development the subject site, or could require mitigation not required at the Project site.

Summary and Conclusion

Development of the Project at Alternative Site No. 1 would diminish or preclude attainment of the Project Objective to "take advantage of access and visual recognition

provided by adjacency to the I-15 freeway." Development of the Project at Alternative Site No. 1 would, as with the current Project site, require amendment of the CCCSP. Development of the Project at Alternative Site No. 1 could result in potentially significant impacts not resulting from development of the Project at its current location. Additionally, and irrespective of the previous considerations, the proponent cannot reasonably acquire, control, or otherwise have access to the Alternative Site No.1. Based on the preceding, relocation of the Project to Alternative Site No. 1 is considered infeasible.

Alternative Site No. 2 comprises approximately 6 acres (APNs 3106-262-14, -15) located southerly of Alternative Site No. 1. Alternative Site No. 2 is designated as a Community Commercial land use under the CCCSP. Development of the Project at Alternative Site No. 2 would require approval of a Conditional Use Permit allowing used automobile sales. As summarized below, development of the Project at Alternative Site No. 2 would diminish attainment of the Project Objectives, and could result in significant environmental impacts not occurring at the current Project site. Further, the proponent cannot reasonably acquire, control, or otherwise have access to Alternative Site No. 2.

Attainment of Certain Project Objectives Diminished or Precluded

Alternative Site No. 2 is approximately 0.3 miles distant from the I-15 corridor, and views of the site are obstructed by intervening development. In this respect, Alternative Site No. 2 would diminish or preclude attainment of the Project Objective to "take advantage of access and visual recognition provided by adjacency to the I-15 freeway."

Potential to Result in Other or Additional Significant Impacts

Aerial photography of Alternative Site No. 2 indicates that the site is vacant and undeveloped and is likely suitable for development. However, significant site-based considerations and constraints (e.g., biological resources, cultural resources, geology and soils, hydrology and water quality) may exist. These factors could either result in significant impacts not resulting from the Project at its current location, could substantively restrict development the subject site, or could require mitigation not required at the Project site.

Summary and Conclusion

Development of the Project at Alternative Site No. 2 would diminish or preclude attainment of the Project Objective to "take advantage of access and visual recognition provided by adjacency to the I-15 freeway." Development of the Project at Alternative Site No. 2 could result in potentially significant impacts not resulting from development of the Project at its current location. Additionally, the proponent cannot reasonably acquire, control, or otherwise have access to the alternative site. Based on the preceding, Alternative Site No. 2 is considered infeasible.

Alternative Site No. 3 comprises the approximately 3.8-acre existing "KIA" dealership located southeasterly of Civic Drive (N – S) at Valley Park Lane.[4] Used auto sales, such as is proposed under the Project is not permitted as a primary occupancy under the CCCSP Civic Auto Park land use designation. A land use amendment from "Civic Auto Park" to "Community Commercial," and approval of a Conditional Use Permit would be required to allow development of the Project used automobile facilities at Alternative Site No. 3.

As summarized below, development of the Project at Alternative Site No. 3 could result in significant environmental effects not resulting from the Project at its current location. Further, the proponent cannot reasonably acquire, control, or otherwise have access to Alternative Site No. 3.

Potential to Result in Other or Additional Significant Impacts

Alternative Site No. 3 is currently developed with automobile dealership facilities. These facilities are of no value to the proponent and represent substantive physical, and environmental impediments to potential implementation of the Project. The existing KIA facilities would have to be demolished to allow for implementation of the Project. Such demolition activities would, at a minimum, result in potential air quality, noise, and traffic impacts not otherwise resulting from development of the Project at the currently proposed location. Additionally, automobile dealership uses typically result in residual

[4] The Project proponent has indicated that the existing KIA dealership is considering relocation.

site contamination concerns requiring remediation prior to or concurrent with site redevelopment actions. Remedial activities at Alternative Site No. 3 have the potential to expose on-site workers and vicinity land uses to hazards or hazardous materials impacts not otherwise resulting from development of the Project at its current location. Further, the resulting demolition debris would contribute to landfill impacts. Such demolition debris and associated landfill impacts would not result from development of the Project at its current location.

Other Considerations

The cost of demolition in combination with the land purchase price at Alternative Site No. 3 are economically prohibitive for the Applicant. The Applicant would not further pursue the Project if located at Alternative Site No. 3. Additionally, Alternative Site No. 3, at approximately 3.8 acres, is undersized when compared to the site suitability criteria (minimum 4.5 acres) noted previously. Further, the diminished acreage at Alternative Site No. 3 would limit on-site auto inventory and efficiency of on-site operations, and would tend to constrain attainment of the Project Objectives to: respond to local and regional car sales market demands, provide new sales tax revenues and increased property tax revenues available to the City of Victorville, and provide car dealership sales and service facilities that are responsive to community needs.

Summary and Conclusion

Development of the Project at Alternative Site No. 3 could result in potentially significant impacts not resulting from development of the Project at its current location. Development of the Project at Alternative Site No. 3 would diminish or preclude attainment of the Project Objectives to: respond to local and regional car sales market demands, provide new sales tax revenues and increased property tax revenues available to the City of Victorville, and provide car dealership sales and service facilities that are responsive to community needs. Based on the preceding, Alternative Site No. 3 is considered infeasible.

5.2.3 Comparative Impacts of Alternatives

For each environmental topic addressed in the RDEIR, environmental impacts associated with each of the considered Alternatives are described relative to impacts of the Project. At the conclusion of these discussions, Table 5.2-5 summarizes and compares relative impacts of the considered Alternatives. Comparative attainment of the Project Objectives is also presented at Table 5.2-5.

5.2.3.1 Comparative Land Use Impacts

Project

In order to implement the Project, while precluding or reducing potential land use impacts, the following City discretionary and permitting actions are necessary:

- **CEQA Compliance.** The City must certify the Environmental Impact Report prior to, or concurrent with, any approval of the Project.

- **Specific Plan Amendment.** The Applicant has requested approval of an amendment to the Civic Center Community Sustainability Plan to conditionally allow used car sales proposed by the Project.

- **Site Plan Review and Approval.** The Project uses, and their proposed configurations would be subject to review and approval by the City.

- **Conditional Use Permit.** The Project would require a Conditional Use Permit to allow a used vehicle sales operation within the CC-2 zone of the Specific Plan.

- **Architectural Review and Approval.** Architectural designs of the Project facilities would be subject to review and approval by the City.

- **Other City Permits.** Various other City of Victorville such as construction, grading, and encroachment permits would be required to allow implementation of the Project facilities.

- Based on the current Project design concept, other anticipated consultation and permits necessary to realize the proposal would likely include, but would not be limited to the following: Consultation with requesting Tribes as provided for under *AB 52, Gatto. Native Americans: California Environmental Quality Act*; and *SB 18, Burton. Traditional tribal cultural places.*

- Permitting may be required by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;

- Permitting may be required by/through the Mojave Desert Air Quality Management District (MDAQMD) for certain equipment or land uses that may be implemented within the Project area;

- Other ministerial permits necessary to realize all on- and off-site improvements related to the development of the site.

Approval of the requested discretionary actions, completion of required consultations, acquisition of required permits and Project compliance with associated requirements incorporated therein, would reduce potential land use impacts of the Project below levels of significance. See also RDEIR Section 4.1, *Land Use and Planning*.

No Project Alternative

The No Project Alternative would develop the site with approximately 51,800 square feet of commercial (general retail merchandise) uses. Automobile sales uses proposed under the Project would not be constructed.

The No Project Alternative reflects development of the Project site consistent with site's current General Plan Land Use and Zoning designations, and would not require the Specific Plan Amendment otherwise required under the Project. Other discretionary actions and permits/consultation(s) required under the Project, or similar actions, would likely be required under the No Project Alternative. When compared to the Project, the

scope of discretionary actions and associated potential land use impacts under the No Project Alternative would be reduced. Under the No Project Alternative and the Project land use impacts would be less-than-significant.

Reduced Intensity Alternative

The Reduced Intensity Alternative would reflect an overall reduction in development scope or modification in occupancies that would reduce the Project ADT by 25 percent. Discretionary actions required under the Reduced Intensity Alternative and the Project would be the same. Under either the Project or the Reduced Intensity Alternative, land use impacts would be less-than-significant.

5.2.3.2 Comparative Transportation Impacts

Project

VMT Impacts

The Project would generate 205 ADT. Project ADT would not exceed City VMT Guidelines screening threshold of 1,285 ADT. Per City VMT Guidelines screening thresholds, Project VMT impacts would be less-than-significant.

LOS Deficiencies

At buildout, implementation of the Project would generate approximately 205 average daily trips (ADT) on the Study Area roadway system. City Conditions of Approval would be implemented as means of addressing Project-related LOS deficiencies.

The Project designs respond to existing and anticipated alternative transportation modes. The Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The Project does not propose inherently hazardous traffic/circulation design features. The Project would not impair or conflict with emergency access. The Project Site Plan Concept provides for adequate and safe access. Final Site Plan design, including site access,

internal circulation, and parking are subject to review and approval by the City. On this basis, the potential for the Project to result in or cause adverse impacts related to hazardous features or improper access and internal circulation features would be less-than-significant. See also RDEIR Section 4.2, *Transportation*.

No Project Alternative

VMT Impacts

The Project would generate approximately 205 ADT. In comparison, the No Project Alternative would generate approximately 1,956 ADT.[5] The approximately 1,956 ADT generated under the No Project Alternative would exceed the City VMT Guidelines screening threshold of 1,285 weekday daily trips, and VMT impacts would be considered potentially significant.

LOS Deficiencies

The 1,956 ADT generated under the No Project Alternative would be approximately 9.5 times greater than the 205 ADT that would be generated by the Project. Resulting LOS deficiencies impacts under the No Project Alternative would likely be comparably increased. Based on the increase in ADT under the No Project Alternative, the extent of Study Area traffic improvements required would likely be increased when compared to the Project. Because the No Project Alternative would generate more traffic than the Project, fair share fee responsibilities (which are based on proportional traffic contributions) would be increased when compared to the Project. It is assumed that, like the Project, the No Project Alternative would implement City Conditions of Approval addressing Study Area LOS deficiencies.

Reduced Intensity Alternative

VMT Impacts

The Reduced Intensity Alternative would reduce Project trip generation by 25 percent. Project trip generation = 205 ADT. The Reduced Intensity Alternative trip generation =

[5] Based on ITE Land Use Code 820 Shopping Center (37.75 ADT/thousand square feet [TSF]) = 37.75 ADT/TSF x 51.8 TSF = 1,956 ADT. Assumes no internal trip capture.

0.75 x 205 ADT = 154 ADT. Less-than-significant VMT impacts resulting from the Project would be further diminished under the Reduced Intensity Alternative.

LOS Deficiencies

Based on the 25 percent reduction in ADT, the extent Study Area traffic improvements required under this Alternative may be reduced when compared to the Project. Because the Reduced Intensity Alternative would generate less traffic than the Project, fair share fee responsibilities (which are based on proportional traffic contributions) would be reduced when compared to the Project. It is assumed that, like the Project, the Reduced Intensity Alternative would implement City Conditions of Approval addressing Study Area LOS deficiencies.

5.2.3.3 Comparative Air Quality Impacts

Project

Project construction and operations would generate additional air pollutant emissions. Project construction-source and operational-source emissions would not exceed any applicable thresholds.

The Project land uses are reflected in the MDAQMD AQMPs. The Project would be consistent with the MDAQMD AQMPs.

All other Project air quality impacts would be less-than-significant. See also RDEIR Section 4.3, *Air Quality*.

No Project Alternative

Under the No Project Alternative and the Project similar construction activities and use of construction equipment would occur. The maximum daily area of disturbance would be the same under both scenarios. Under the No Project Alternative and the Project, construction-source emissions impacts would be less-than-significant.

The increase in vehicular trips under the No Project Alternative would increase operational-source air pollutant emissions. The increase in ADT generation under the No

Project Alternative (approximately 9.6 times greater than the Project) would translate to a roughly proportional increase in air pollutant emissions. Table 5.2-1 provides a comparison of operational-source air pollutant emissions under the Project and No Project Alternative.

Table 5.2-1
Project and No Project Alternative
Operational-Source Emissions Comparison
(Pounds per Day, Maximum Total Summer/Winter Emissions)

Pollutant	MDAQMD Threshold	Project		No Project Alternative	
		Emissions	Threshold Exceeded?	Emissions	Threshold Exceeded?
VOC	137	0.98	No	9.41	No
NOx	137	3.22	No	30.91	No
CO	548	3.77	No	36.19	No
SOx	137	0.01	No	0.10	No
PM_{10}	82	0.68	No	6.53	No
$PM_{2.5}$	82	0.19	No	1.82	No

Sources: Project operational-source emissions estimates from: *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. No Project Alternative operational-source emissions estimates–Applied Planning, Inc.

As indicated at Table 5.2-1, the increase in trip generation under the No Project Alternative, would result in increases in all operational-source air pollutant emissions otherwise resulting from the Project. However, increased operational-source emissions under the No Project Alternative would not exceed any applicable MDAQMD thresholds. Operational-source emissions impacts under the No Project Alternative would be less-than-significant. Because the No Project Alternative would result in no significant air quality impacts, non-attainment impacts would also be less-than-significant.

Because the No Project Alternative land uses would conform to development reflected in the MDAQMD AQMPs, the No Project Alternative would be considered consistent with the MDAQMD AQMPs. Potential AQMP consistency impacts would be less-than-significant.

Other operational-source air quality impacts under the No Project Alternative may be generally increased when compared to the Project, but would remain less-than-significant.

Reduced Intensity Alternative

Under the Reduced Intensity Alternative, the overall trip generation of the Project would be reduced by 25 percent. Construction activities and use of construction equipment would be similar to the Project. As with the Project, mitigated construction-related emissions would not exceed MDAQMD emissions thresholds.

The 25 percent reduction in trip generation under the Reduced Intensity Alternative would translate roughly to a 25 percent reduction in air pollutant emissions when compared to the Project. Table 5.2-2 provides a comparison of operational-source air pollutant emissions under the Project and Reduced Intensity Alternative.

Table 5.2-2
Project and Reduced Intensity Alternative
Operational-Source Emissions Comparison
(Pounds per Day, Maximum Total Summer/Winter Emissions)

Pollutant	MDAQMD Threshold	Project		No Project Alternative	
		Emissions	Threshold Exceeded?	Emissions	Threshold Exceeded?
VOC	137	0.98	No	0.74	No
NOx	137	3.22	No	2.42	No
CO	548	3.77	No	2.83	No
SOx	137	0.01	No	0.01	No
PM_{10}	82	0.68	No	0.49	No
$PM_{2.5}$	82	0.19	No	0.14	No

Sources: Project operational-source emissions estimates from: *Victorville CarMax, Air Quality Impact Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. No Project Alternative operational-source emissions estimates–Applied Planning, Inc.

As indicated at Table 5.2-2, when compared to the Project, operational emissions would be incrementally reduced for all criteria pollutants under the Reduced Intensity Alternative. As with the Project, operational-source emissions under the Reduced Intensity Alternative would not exceed any applicable MDAQMD thresholds and would

be less-than-significant. As with the Project, the Reduced Intensity Alternative's nonattainment impacts would be less-than-significant.

The Reduced Intensity Alternative land uses are reflected in land use plans and regional development assumed in the MDAQMD AQMPs. The Reduced Intensity Alternative would therefore be consistent with the MDAQMD AQMPs. AQMP consistency impacts under the Reduced Intensity Alternative would be less-than-significant.

Other operational-source air quality impacts under the Reduced Intensity Alternative would be generally reduced when compared to the Project and would be less-than-significant.

5.2.3.4 Comparative Greenhouse Gas/Global Climate Change Impacts

Project

The Project would conform to applicable provisions of the City of Victorville Climate Action Plan (CAP). RDEIR Mitigation Measure 4.4.1 ensures the timely and monitored implementation of applicable CAP provisions. Additionally, the nominal Project GHG emissions (303.32 MTCO2e/year) would not exceed the applicable SCAQMD threshold of 3,000 MTCO2e/year. The Project would therefore not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Based on the preceding, the potential for the Project to generate GHG emissions that would either directly or indirectly have a significant impact on the environment, both individually and cumulatively, would be less-than-significant.

The Project would not otherwise interfere with any existing or future City-mandated, state-mandated, or federally-mandated obligations enacted or promulgated to legally require development projects to assist in meeting state-adopted greenhouse gas emissions reduction targets, including those proposed or established by: CARB, State implementation of (i) Executive Order B30-15 and SB 32's target of reducing statewide

GHG emissions to 40% below 1990 levels by 2030 ; or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80% below 1990 levels by 2050. These measures are reflected in the CARB 2008 Scoping Plan, and the CARB 2017 Scoping Plan.

On this basis, the potential for the Project to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases is considered less-than-significant.

See also RDEIR Section 4.4, *Greenhouse Gas Emissions*.

No Project Alternative

The No Project Alternative would implement approximately 103,700 square feet of general retail merchandise commercial uses. The majority of Project-source GHG emissions would be generated by mobile sources. More specifically, Project mobile sources would generate an estimated 188.36 $MTCO_2E$/year. Similarly, the majority of GHG emissions under the No Project Alternative would be generated by mobile sources. Based on the comparative increase in trip generation under the No Project Alternative (approximately 9.6 times that of the Project), mobile sources under the No Project Alternative would generate an estimated 1,808.26 $MTCO_2E$/year. For analysis purposes it is assumed that GHG emissions from all other sources would be consistent under the Project and No Project Alternative. A comparison of Project and No Project GHG emissions is presented at Table 5.2-3.

Table 5.2-3
Project and No Project Alternative
GHG Emissions Comparison

Source	Project $MTCO_2E$/year	No Project Alternative Total $MTCO_2E$/yr
Mobile Sources	188.36	1,808.26
All Other	114.96	114.96
Total	303.32	1,923.22

Sources: Project GHG emissions estimates from: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. No Project Alternative GHG emissions estimates–Applied Planning, Inc.

GHG emissions generated by the No Project Alternative would be increased when compared to the Project. It is assumed that the No Project Alternative would incorporate design features and operational programs to ensure conformance with the City CAP. Under the No Project Alternative and the Project, GHG emissions impacts would be less-than-significant.

The No Project Alternative is assumed to comply with applicable plans and policies addressing GHG emissions. On this basis, the No Project Alternative would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be comparable to the Project.

Reduced Intensity Alternative

Reduced trip generation, and associated reduction in mobile-source emissions under the Reduced Intensity Alternative would result in diminished GHG emissions when compared to the Project. For the purposes of this analysis, mobile-source GHG emissions under the Reduced Intensity Alternative are estimated to be reduced roughly proportional to the reduction in trip generation (approximately percent 25 percent) that would result from this Alternative. For analytic purposes, GHG emissions from all other sources are assumed to be consistent under the Project and the Reduced Intensity Alternative. A comparison of Project and Reduced Intensity Alternative GHG emissions is presented at Table 5.2-4.

Table 5.2-4
Project and Reduced Intensity Alternative
GHG Emissions Comparison

Source	Project GHG Emissions $MTCO_2E$/year	Reduced Intensity Alternative GHG Emissions $MTCO_2E$/year
Mobile Sources	188.36	141.27
All Other	114.96	114.96
Total	**303.32**	**256.23**

Sources: Project GHG emissions estimates from: *Victorville CarMax, Greenhouse Gas Analysis, City of Victorville* (Urban Crossroads, Inc.) October 2, 2018. No Project Alternative GHG emissions estimates–Applied Planning, Inc.

GHG emissions generated by the Reduced Intensity Alternative would be decreased when compared to the Project. It is assumed that the Reduced Intensity Alternative would incorporate design features and operational programs to ensure conformance with the City CAP. Under the Reduced Intensity Alternative and the Project, GHG emissions impacts would be less-than-significant.

The Reduced Intensity Alternative is assumed to comply with applicable plans and policies addressing GHG emissions. On this basis, the Reduced Intensity Alternative would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be comparable to the Project.

5.2.3.5 Comparative Noise Impacts

Project

Project construction-source noise and construction-source vibration impacts would be less-than-significant. Project operational area-source and vehicular-source noise impacts would be less-than-significant. Project operational-source vibration impacts would be less-than-significant. The Project would not otherwise substantively contribute to or be affected by any existing adverse noise conditions. See also RDEIR Section 4.5, *Noise*.

No Project Alternative

Under the No Project Alternative, the types of construction activities and equipment employed would likely be similar to those associated with construction of the Project. Maximum construction-source noise/vibration levels received at off-site locations would be comparable to those resulting from construction of the Project. Under the No Project Alternative and the Project, construction-source noise/vibration would be less-than-significant.

The No Project Alternative does not propose uses that would generate or result in operational area-source noise or vibration impacts substantively different than would result from uses proposed by the Project. The No Project Alternative would not require

or implement uses that would be substantive vibration sources. Under the No Project Alternative and the Project, operational area-source noise impacts and operational area-source vibration impacts would be less-than-significant as mitigated.

The increase in vehicle trips under the No Project Alternative may increase vehicular-source noise levels along area roadways. However, any increase in roadway noise would likely be imperceptible.[6] Under the No Project Alternative and the Project vehicular-source noise impacts would be less-than-significant.

The No Project Alternative would not otherwise substantively contribute to or be affected by any existing adverse noise conditions.

Reduced Intensity Alternative

Under the Reduced Intensity Alternative, the types of construction activities and equipment employed would likely be similar to those associated with construction of the Project. Maximum construction-source noise/vibration levels received at off-site locations would be comparable to those resulting from construction of the Project. Under the Reduced Intensity Alternative and the Project, construction-source noise/vibration would be less-than-significant.

The Reduced Intensity Alternative uses would not generate or result in operational area-source noise substantively different than would result from uses proposed by the Project. The Reduced Intensity Alternative would not require or implement uses that would be substantive vibration sources. Under the Reduced Intensity Alternative and the Project, operational area-source noise impacts and operational vibration impacts would be less-than-significant as mitigated.

[6] Assuming all other factors are constant, a doubling (of halving) of roadway traffic volumes is typically required to generate a perceptible (> 3.0 dBA) noise level. The No Project Alternative would generate approximately 1,956 ADT. The Opening Year traffic volume along adjacent Civic Drive would be > 8,600 (Project TIA, p. 30). Traffic generated by No Project Alternative would represent approximately 23 percent of the Opening Year traffic volume along adjacent Civic Drive. The No Project Alternative would not perceptibly contribute to area vehicular-source noise levels.

The reduction in vehicle trips under the Reduced Intensity Project Alternative may reduce vehicular noise levels along area roadways. Any reduction in roadway noise would however likely be imperceptible. Under the Reduced Intensity Alternative and the Project vehicular-source noise impacts would be less-than-significant.

The Reduced Intensity Alternative would not otherwise substantively contribute to or be affected by any existing adverse noise conditions. Under the Reduced Intensity Alternative and the Project airfield/airport noise impacts would be less-than-significant.

5.2.3.6 Comparative Energy Impacts

Project

The analysis at RDEIR Section 4.6, *Energy* substantiates that the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

No Project Alternative

Under the No Project Alternative, general retail uses would be implemented. The No Project uses would result in energy demands comparable to the Project. As with the Project, the No Project uses would be required to implement energy-efficient facilities, and to otherwise demonstrate conscientious energy use. Under the No Project Alternative, proposed development would also be required to substantiate compliance with state or local plan for renewable energy or energy efficiency. Impacts would be similar to the Project and would be less-than-significant.

Reduced Intensity Alternative

The reduction in development scope under the Reduced Intensity Project Alternative would likely reduce total energy demands and total energy consumption. As with the Project, the Reduced Intensity Alternative uses would be required to implement energy-efficient facilities, and to otherwise demonstrate conscientious energy use. Under the Reduced Intensity Alternative, proposed development would also be required to

substantiate compliance with state or local plan for renewable energy or energy efficiency. Impacts would be similar to the Project and would be less-than-significant.

5.2.4 Comparative Attainment of Project Objectives

The following discussions compare attainment of the Project Objectives under the No Project and Reduced Intensity Alternatives. For ease of reference, the Project Objectives are restated below. See also RDEIR Section 3.6, *Project Objectives*.

5.2.4.1 Project Objectives

The primary goal of the Project is the redevelopment of the subject site with a car dealership use that responds to local and regional car sales market demands. Supporting Project Objectives include the following:

- Transition and repurpose the subject site to a useful productive commercial auto dealership and services facility. Benefits would include new sales tax revenues and increased property tax revenues available to the City of Victorville.

- Preserve and enhance visual attributes of the Project site.

- Provide car dealership sales and service facilities that are responsive to community needs and that are compatible with proximate land uses.

- Take advantage of access and visual recognition provided by the Project site's adjacency to the I-15 freeway.

- Implement employment-generating land uses that would create new jobs available to City residents.

- Take advantage of available infrastructure.

No Project Alternative Attainment of Project Objectives

Because the No Project Alternative would implement general merchandise retail uses, none of the Project auto dealership/auto services Objectives would be realized. Other Project Objectives would likely be realized.

Reduced Intensity Alternative Attainment of Project Objectives

The Reduced Intensity Alternative would reduce the scope and/or modify the types of uses otherwise resulting from the Project. Under the Reduced Intensity Alternative, only limited attainment of Project Objectives would be achieved.

5.2.5 Comparison of Alternatives

Table 5.2-5 provides a summary, by topic, of the preceding alternatives analysis, indicating comparative impacts of the Project and the considered Alternatives.

5.2.6 Environmentally Superior Alternative

The *CEQA Guidelines* require that the environmentally superior alternative (other than the No Project Alternative) be identified among the Project and other Alternatives considered in an EIR. As indicated at Table 5.2-5, already less-than-significant environmental effects of the Project would be generally diminished under the Reduced Intensity Alternative. On this basis, and for informational purposes, the Reduced Intensity Alternative would be considered the "environmentally superior alternative." However, under the Reduced Intensity Alternative, only limited attainment of Project Objectives would be achieved. It is also again noted that the Project would not result in any significant and unavoidable environmental effects, and the discussion of Alternatives presented herein is provided for illustrative and informational purposes.

Table 5.2-5
Summary of Potential Impacts, Alternatives Compared to Project, By Topic

RDEIR Topic: Project Impacts	No Project Alternative	Reduced Intensity Alternative
Land Use and Planning: Project impacts would be less-than-significant.	Impacts would be similar to those of the Project and would be less-than-significant. Amendment of the Civic Center Community Sustainability Specific Plan would not be required.	Impacts would be similar to those of the Project and would be less-than-significant.
Transportation: Project VMT impacts would be less-than-significant. LOS deficiencies would be addressed through City Conditions of Approval. All other impacts would be less-than-significant.	VMT impacts would be potentially significant. Trip generation under the No Project Alternative would be approximately 9.5 times that of the Project. Under the No Project Alternative, the scope of off-site Study Area circulation system improvements that may be necessary to address LOS deficiencies would likely be increased when compared to the Project. All other impacts would be comparable to the Project and would be less-than-significant.	Already less-than-significant VMT impacts of the Project would be further diminished. Trip generation would be incrementally reduced by an estimated 25 percent under the Reduced Intensity Alternative. Under the Reduced Intensity Alternative, the scope of off-site Study Area circulation system improvements that may be necessary to address LOS deficiencies would likely be reduced when compared to the Project. All other impacts would be comparable to the Project and would be less-than-significant.
Air Quality: Construction-source air quality impacts would be less-than-significant. Operational-source air quality impacts would be less-than-significant. Nonattainment impacts would be less-than-significant. AQMP consistency impacts would be less-than-significant. All other air quality impacts would be less-than-significant.	Construction-source air quality impacts would be similar to those of the Project and would be less-than-significant. Operational-source air pollutant emissions would be increased when compared to the Project but would remain less-than-significant. Nonattainment impacts would be less-than-significant. AQMP consistency impacts would be similar to the Project and would be less-than-significant. All other air quality impacts would be similar to the Project and would be less-than-significant.	Construction-source air quality impacts would be similar to those of the Project and would be less-than-significant as mitigated. Operational-source air pollutant emissions would be decreased when compared to the Project and would be less-than-significant. Nonattainment impacts would be similar to the Project and would be less-than-significant. AQMP consistency impacts would be similar to the Project and would be less-than-significant. All other air quality impacts would be similar to the Project and would be less-than-significant.
Greenhouse Gas Emissions (GHG): The Project would conform to provisions of the City CAP. Quantified GHG/GCC impacts of the Project would not exceed SCAQMD or other screening thresholds and would be less-than-significant. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of	When compared to the Project, GHG emissions would be increased under the No Project Alternative. It is assumed the No Project Alternative would nonetheless conform to provisions of the City CAP. Quantified GHG/GCC impacts of the No Project Alternative would not exceed SCAQMD or other screening thresholds and would be less-than-significant.	When compared to the Project, GHG emissions would be reduced under the Reduced Intensity Alternative. It is assumed the Reduced Intensity Alternative the Project Alternative would conform to provisions of the City CAP. Quantified GHG/GCC impacts of the Reduced Intensity Alternative would not exceed SCAQMD or other screening thresholds and would be less-than-significant.

Table 5.2-5
Summary of Potential Impacts, Alternatives Compared to Project, By Topic

RDEIR Topic: Project Impacts	No Project Alternative	Reduced Intensity Alternative
greenhouse gases.	The No Project Alternative would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be similar to the Project and would be less-than-significant.	The Reduced Intensity Alternative would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be similar to the Project and would be less-than-significant.
Noise: Project construction-source noise and vibration impacts would be less-than-significant. Operational area-source noise and vibration impacts would be less-than-significant. Vehicular-source noise impacts would be less-than-significant.	Construction-source noise and vibration impacts would be similar to those of the Project and would be less-than-significant. Operational area-source noise and vibration impacts would be similar to those of the Project and would be less-than-significant. Vehicular-source noise impacts may increase but would remain less-than-significant. Any incremental increases in roadway noise relative to effects of the Project would be imperceptible.	Construction-source noise and vibration impacts would be similar to those of the Project and would be less-than-significant. Area operational-source noise and vibration impacts would be similar to those of the Project and would be less-than-significant. Vehicular-source noise impacts may decrease and would remain less-than-significant. Any incremental decreases in roadway noise relative to effects of the Project would be imperceptible.
Energy: Project energy impacts would be less-than-significant.	Energy impacts would be similar to the Project and would be less-than-significant.	Total energy demands and energy consumption would likely be reduced. As with the Project, energy impacts would be less-than-significant.
Relative Attainment of Project Objectives: All Project Objectives would be attained.	Because the No Project Alternative would implement general merchandise retail uses, none of the Project auto sales/auto service Objectives would be realized. Other Project Objectives would likely be realized.	The Reduced Intensity Alternative would reduce the scope of uses otherwise resulting from the Project. Under the Reduced Intensity Alternative, only limited attainment of Project Objectives would be achieved.

5.3 GROWTH-INDUCING IMPACTS OF THE PROPOSED ACTION

5.3.1 Overview

The California Environmental Quality Act requires a discussion of the ways in which a project could be growth-inducing. (Public Resources Code, §21100, subd. (b)(5); *CEQA Guidelines*, § 15126, subd. (d), 15126.2, subd (d.).) The *CEQA Guidelines* identify a project as growth-inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of significance to the environment. New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Development pressures are a result of localized economic investments. These pressures help to structure the local politics of growth and the local jurisdiction's posture on growth management and land use policy. The land use policies of local municipalities and counties regulate growth at the local level.

Impacts related to growth inducement would also be realized if a project provides infrastructure or service capacity which accommodates growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

5.3.2 Direct Growth-Inducing Effects

The Project does not propose housing or a change in land use that would result in additional residential development and associated direct growth in the City resident population.

The Project would realize auto dealership/auto maintenance uses and associated employment opportunities. The extent to which new job opportunities are filled by the existing resident population tends to reduce any growth-inducing effect of a project. It is anticipated that employment opportunities arising from the Project would be filled predominantly by local residents and would not induce substantial growth or result in permanent relocation of populations.

Based on the preceding discussion, the Project would not directly result in unanticipated significant population growth or other direct growth-inducing effects.

5.3.3 Indirect Growth-Inducing Effects

Investment in the Project would engender local and regional economic growth which may result in indirect growth-inducing effects. The Project's potential economic benefits could indirectly result in employment growth in the region. This growth, in combination with other anticipated employment growth in the region, could indirectly result in population growth. Such growth has a variety of potential effects on the physical environment, including but not limited to, effects on air quality, ambient noise levels, traffic impacts, and water quality.

Development of the Project as envisioned would entail upgrades to infrastructure in the immediate Project vicinity, including abutting roadways. Infrastructure improvements necessitated by the implementation of the Project could serve to facilitate and encourage development of nearby properties. The characteristics and intensities of development that could occur on properties near the Project site are governed by governing General Plan documents. Development of these properties within the context of approved General Plan(s) should not result in unforeseen or unmitigable impacts.

5.4 SIGNIFICANT ENVIRONMENTAL EFFECTS

An EIR must identify any significant environmental effects that would result from the Project. (Public Resources Code, §21100, subd. (b)(2)(B).) As substantiated herein, all Project impacts would be less-than-significant or less-than-significant as mitigated.

5.5 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines sections 15126 (c), 15126.2 (c) & 15127 require that for certain types or categories of projects, an EIR must address significant irreversible environmental changes that would occur should the project be implemented. As presented at *CEQA Guidelines* section 15127, the topic of Significant Irreversible Environmental Changes need be addressed in EIRs prepared in connection with any of the following activities:

(a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;

(b) The adoption by a local agency formation commission of a resolution making determinations; or

(c) A project which will be subject to the requirements for preparing of an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S.C. Section 43214347.

The Project qualifies under *CEQA Guidelines* section 15127 (a) because a Specific Plan Amendment is required to implement the Project. Accordingly, this RDEIR addresses potential significant irreversible environmental changes involved in the proposed action should it be implemented [*CEQA Guidelines*, §§ 15126.2(c) and 15127]. An impact would fall into this category if:

- A project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of a project would generally commit future generations to similar uses;

- A project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; or

- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Regarding the above, a given development proposal may result in significant irreversible effects should key resources be degraded or destroyed such that there would be little possibility of restoring them. No such degradation or destruction of resources is anticipated because of the Project. While the Project would represent a permanent commitment of the currently vacant site to new auto dealership/auto service uses, no important natural resources would be lost because of Project implementation. Various natural resources, in the form of construction materials and energy resources, would be used in the construction of the Project, but their use is not expected to result in shortfalls in the availability of these resources.

Construction of the Project would commit the subject site to the proposed auto dealership/auto service uses for the foreseeable future, and thereby limit the range of other future uses of the properties. Similarly, any development of the site (irrespective of the Project) would limit the range of other future uses of this land. Given the current undeveloped nature of the site, the limited amount of suitable unencumbered vacant property in the City, and the urbanization of surrounding properties, transition of the subject site to a developed state such as would occur under the Project is considered consistent with the highest and best uses of the site. The Project site does not contain any significant natural features which should be preserved for public recreation or open space purposes. The Project site does not contain any known features of significant cultural or historical value. Mitigation is proposed for any cultural/tribal cultural resources which may be encountered during Project development activities.

6.0 ACRONYMS AND ABBREVIATIONS

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ADT	average daily trip
af	acre-feet
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measures
BAU	business as usual
bgs	below ground surface
BMP	Best Management Practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CF_4	Tetrafluoromethane

C_2F_6	Hexafluoroethane
CFC	Chlorofluorocarbon
cfs	cubic feet per second
CH_4	Methane
C_2H_6	Ethane
CIP	Capital Improvement Plan
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CPUC	California Public Utilities Commission
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fees
DPM	Diesel Particulate Matter
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FAR	Floor-to-Area Ratio
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FTA	Federal Transit Administration
GCC	Global Climate Change
GFA	gross floor area
Gg	Gigagram
GHG	Greenhouse Gas

GWP	Global Warming Potential
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbon
HI	Hazard Index
H_2O	Water
HOV	high-occupancy vehicle
HRA	Health Risk Assessment
HVAC	Heating, Ventilation, & Air Conditioning
ICU	Intersection Capacity Utilization
IS	Initial Study
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
IWWTP	Industrial/Wastewater Treatment Plant
lbs/day	pounds per day
Ldn	day/night average sound level
LED	light-emitting diodes
Leq	equivalent sound level
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
MDAQMD	Mojave Desert Air Quality Management District
MEIR	Maximally Exposed Individual Receptor
MEISC	Maximally Exposed Individual School Child
MEIW	Maximally Exposed Individual Worker
mgd	million gallons per day
$MMTCO_2e$	Million Metric Ton of Carbon Dioxide Equivalent
MOE	measures of effectiveness
MPO	Metropolitan Planning Organization
MSHCP	Multiple Species Habitat Conservation Plan
msl	mean sea level

MUTCD	Manual of Uniform Traffic Control Devices
$\mu g/m^3$	micrograms per cubic meter
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Health and Safety
N_2O	Nitrous Oxide
NOP	Notice of Preparation
NO_x	Oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OEHHA	California Office of Environmental Health Hazard Assessment
OPR	State of California Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCE	passenger car equivalency
PFC	Perfluorocarbon
$PM_{2.5}$	Particulate Matter Less Than 2.5 Microns in Diameter
PM_{10}	Particulate Matter Less Than 10 Microns in Diameter
ppb	parts per billion
ppm	parts per million
ppt	parts per trillion
RBBD	Road and Bridge Benefit District
RDEIR	Recirculated Draft Environmental Impact Report
RECs	Recognized Environmental Conditions
REL	Reference Exposure Level
RMP	Risk Management Plan
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board

SARWQCB	Santa Ana Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SF_6	Sulfur Hexafluoride
SIP	State Implementation Plan
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SO_x	Oxides of sulfur
SRRE	Source Reduction and Recycling Element
SSC	Species of Special Concern
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TEA-21	Transportation Equity Act for the 21st Century
TIA	Traffic Impact Analysis
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
URF	Unit Risk Factor
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VFP	Vehicle fueling position
V/C	Volume to Capacity
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	Volatile Organic Compound
VWD	Victorville Water District
WQMP	Water Quality Management Plan

7.0 REFERENCES

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DOCUMENTS CONSULTED

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APPENDICES

Please refer to accompanying CD