FINAL

Public Review Draft
Initial Study/Mitigated Negative Declaration

Prime Healthcare – Desert Valley Hospital Emergency Department and Medical Surgery Building Addition

MAY 2025

Prepared for:

CITY OF VICTORVILLE
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Table of Contents

SECTION **PAGE**

APPENDICES

FIGURES

TABLES

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AERMOD	American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model
BMP	best management practice
BSA	biological study area
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CDNPA	California Desert Native Plants Act
CEQA	California Environmental Quality Act
CH4	methane
CHRIS	California Historical Resources Information System
City	City of Victorville
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
ED	Emergency Department
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
GWP	global warming potential
HARP2	Hotspots Analysis and Reporting Program Version 2
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
ips	inches per second
IWTP	industrial wastewater treatment plant
kWh	kilowatt-hours
Leq	sound equivalent level
Leq 8-hr	8-hour sound equivalent level
MBTA	Migratory Bird Treaty Act
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
MGD	million gallons per day
MM	Mitigation Measure

Acronym/Abbreviation	Definition
MND	mitigated negative declaration
MRZ	Mineral Resource Zone
MT	metric tons
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
O_3	ozone
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
ppv	peak particle velocity
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
TAC	toxic air contaminant
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
VVWRA	Victor Valley Wastewater Regional Authority
VWD	Victorville Water District

1 Introduction

1.1 Project Overview

The proposed Desert Valley Hospital Emergency Department & Medical Surgery Building Addition (project) consists of the construction of a new two-story building addition to the existing Desert Valley Hospital. The building addition would include a new Emergency Department (ED) on the first floor and a new Medical-Surgical Department (Med Surg Unit) on the second floor. As part of the project, a new service yard would be provided on site to accommodate utilities for the building addition. On-site and off-site improvements are planned as part of the project to accommodate additional parking spaces and efficient traffic flow. The purpose of this project is to provide a new ED for the facility to address the needs of the hospital and community. Specifically, the building addition would provide an opportunity to create capacity for current and future demand, as well as to resolve the challenges and deficiencies in the existing departments.

1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) requires that any project in the State of California determined to have the potential to result in adverse impacts to the environment be analyzed under the CEQA Guidelines and the results disclosed to the public (14 CCR 15000 et seq.; California Public Resources Code Section 21000 et seq.). A lead agency is determined under CEQA as the agency with greatest authority over the resources or land the proposed project is likely to impact, often a city, county, school district, or public resource agency. The proposed project would be required to complete environmental review under CEQA, led by the City of Victorville (City), to identify and disclose potential environmental impacts associated with the proposed project.

The City has prepared this mitigated negative declaration (MND) in conformance with Section 15070(a) of the CEQA Guidelines. The purpose of the MND environmental evaluation is to describe the proposed project, determine any potentially significant impacts associated with the proposed project, and incorporate mitigation measures into the project design as necessary to reduce or eliminate the potentially significant effects of the project.

1.3 Project Planning Setting

The project site is located within the City of Victorville. The City of Victorville General Plan 2030 General Plan and Victorville Municipal Code guide and govern planning within the City. The project site is located within the Mojave Desert Air Basin (MDAB) and is within the jurisdictional boundaries of Mojave Desert Air Quality Management District (MDAQMD).

1.4 Public Review Process

Pursuant to CEQA Guidelines Section 15105(b), the MND will be available for a public comment period of not less than 30 days from June 20, 2025 to July 20, 2025

In reviewing the MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment, as well as ways in which the significant effects of the project are proposed to be avoided or mitigated.

Comments may be made on the MND in writing before the end of the comment period. Following the close of the public comment period, the City will consider this MND and comments thereto in determining whether to approve the proposed project. Written comments on the MND should be sent to the following address by July 2, 2025.

Mina Morgan
14343 Civic Drive
Victorville, California 92393

2 Project Description

2.1 Project Location

The project is located at the Desert Valley Hospital Medical Campus in eastern Victorville, in Victorville County, California (Figure 1, Project Location). The entire project site is approximately 10.59 acres and occurs primarily on Assessor's Parcel Numbers 3091-371-09, 3091-371-10, 3091-371-05, and 3091-371-04. The project site is bound by an empty lot adjacent to Jasmine Street to the north, 2nd Avenue to the west, 1st Avenue to the east, and Bear Valley Road to the south (Figure 2, Site Plan).

2.2 Environmental Setting

The project site is mostly developed, consisting of a hospital campus and empty lot (Assessor's Parcel Numbers 3091-371-04, 3091-371-05, 3091-371-09, and 3091-371-10). The empty lot is located in the southeastern portion of the project site. The project site is zoned as General Commercial (C-2T) and has a land use of Commercial (Figure 4 and 5). The site is relatively flat, and the site elevation ranges from approximately 3,025 to 3,045 feet above mean sea level.

The project site is surrounded by vacant lots to the north, east, and west, with some existing development to the south and east. Beyond the vacant lots to the north and west, there are existing residential uses. Commercial uses are located to the south and east of the project site.

Regional access to the project site is provided by Interstate 15, which runs north–south and east–west adjacent to the project site, and State Route 18, which runs east–west. The project site is directly accessible via Bear Valley Road and 2nd Avenue.

2.3 Project Characteristics

Emergency Department and Medical-Surgical Department

The proposed building addition to the existing Desert Valley Hospital would be located east of the existing Medical Office Building and would occupy the southeast corner of the Desert Valley Hospital. The approximately 83,369-square-foot building addition would be two stories. The first floor of the building addition would include 39,036 square feet for a new ED. The new ED would connect to the existing hospital on the first floor through an existing corridor that would be widened. The new ED would provide 68 treatment bays. The second floor of the building addition would include 38,269 square feet for a Med Surg Unit. The Med Surg Unit would provide 71 beds. One existing bed in an existing Med Surg Unit would be eliminated to accommodate access from the existing hospital to the new building addition. The Med Surg Unit would connect to the existing hospital through a new bridge over the existing hospital's low roof. The vertical transportation system is planned to be traction type elevators with hospital size cabs. Two patient/staff/service elevators would be provided. The exterior building would have a modern façade consisting of corrugated metal and composite panels integrated with an exterior insulation and finish system applied on metal stud framing. Upon the project completion, the Desert Valley Hospital would have 218 licensed beds in total. The building addition would add approximately 150 new employees to the hospital.

Helipad Area

Desert Valley Hospital has an existing ground-based helipad on site east of the existing Medical Office Building with access to the helipad through a driveway along Bear Valley Road. The existing ground-based helipad and associated gurney ramp would be demolished as part of the site preparation for the proposed building addition and new driveway location. A new helipad is proposed for the Hospital and would be located on the roof level of the proposed building addition. The new helipad would accommodate a regional emergency medical services helicopter. The top of the helideck would be approximately 45 feet above grade.

Service Yard

The project would include a new Service Yard on the northeast portion of the project site to accommodate utilities for the building addition. The Service Yard would include a pump house, a cooling tower, a chiller room, a normal power electrical room, and an emergency power electrical room. The portions of the Service Yard housing the pump house and the cooling tower would be open to the sky. East of the Service Yard would be a new Bulk Oxygen Storage Yard. North of the Service Yard in the existing employee parking lot, there would be two new emergency water storage tanks located underground.

Vehicular and Pedestrian Access

The primary patient vehicular access to the site would be from the relocated driveway along Bear Valley Road. Walk-in ED patients could be dropped off at the ED canopy located at the south end of the building addition or could park in the proposed parking spaces to the east of the building addition and walk along the provided sidewalks and crosswalks to the walk-in entry. There would also be a second driveway entrance constructed at Bear Valley Road and an additional one at 1st Avenue.

The project would provide additional parking for ED walk-in patients and physicians east of the proposed building addition. A total of 162 new parking stalls would be provided, for a total of 943 parking stalls on site. Of these new parking stalls, 19 would be accessible (for a total of 54 accessible stalls on site) and 3 would be van accessible (for a total of 9 van accessible stalls). Additionally, 9 stalls would be clean air and 29 would be future electric vehicle charging only stalls.

Emergency Vehicle Access

The north end of the building addition would include an Ambulance Canopy for ambulance patient drop-off. Emergency vehicles would access the site from either 2nd Avenue or Bear Valley Road. There would be four ambulance parking spaces provided at the Ambulance Canopy. An additional four parking spaces for emergency vehicles would be located on the opposite side of this driveway for ambulance overflow parking and other emergency vehicles.

Landscaping

All landscaping for the proposed facility would be consistent with Section 16-3.10.020(e) of the Victorville Municipal Code development standards for commercial districts and Water Conservation Ordinance 2114, which requires the use of native and low water plants for the development of the landscaping palette.

The project would require the removal of 26 trees, which includes several ornamental non-native trees along with two western Joshua trees. Chapter 13.33 of the Victorville Municipal Code prohibits the removal of western Joshua trees (*Yucca brevifolia*) without the consent of the director of Parks and Recreation. All tree removal would be compliant with Chapter 13.33 of the Victorville Municipal Code.

Lighting

Lighting for the ED would be consistent with current lighting usage and would be illuminated from 6:00 p.m. to 6:00 a.m. All lighting for the proposed facility would be consistent with Section 16-3.10.020(e) of the Victorville Municipal Code development standards for commercial districts.

Infrastructure Improvements

Site improvements would include relocating the driveway on Bear Valley Road and providing an ED walk-in/drop-off area with a canopy, ambulance parking and drop-off with a canopy, a new service yard, and a new parking lot for ED patients and physicians.

Sustainable Design Features

The design of the building addition includes several sustainable design features related to energy efficiency and drainage. The glazing system of the building addition is designed to maximize energy efficiency, incorporating a combination of storefront-type windows and fixed windows, all equipped with low-E insulated glass, which minimizes energy consumption. Additionally, The roofing system of the building addition would have reflective white surface to mitigate heat absorption and would include tapered rigid foam sheets are adhered to the flat concrete roof slab providing insulation and enabling efficient water drainage.

Off-Site Improvements

As shown in Figure 3, off-site improvements for the project would include the relocation of two existing electrical poles and improvements at Bear Valley Road and 1st Avenue. Improvements along Bear Valley Road would include the installation of a median and sidewalk. Off-site improvements along 1st Avenue would consist of sidewalk improvements and the continuation of 1st Avenue to Bear Valley Road.

2.4 Project Construction and Phasing

The project is scheduled to begin construction in May of 2025, and is anticipated to be completed by the end of October, 2027. The project would involve the removal of 42,997.5 square feet of existing asphalt and the grading and disturbance of an area totaling 8.22 acres. The earthwork would include cutting 12,895.44 cubic yards of material and filling 5,083.26 cubic yards, with an average disturbance depth of 0.71 feet and a maximum depth of 10.9 feet below ground surface. Significant off-street and utility improvements are planned, including the construction of three new driveway entrances—two on Bear Valley Road and one on 1st Avenue. Bear Valley Road would be widened with 484 linear feet of new center median and 5,777 square feet of landscaping. An additional 78,720 square feet of new pavement would be restriped, affecting a total length of 784.50 feet. Similarly, 1st Avenue would be extended along the properties within the project scope, covering a total length of 1,053.60 feet. The project would be executed in phases, starting with demolition and initial earthwork, followed by grading and excavation, then infrastructure and roadway improvements, and concluding with finishing touches and finalization. Each phase is strategically planned to ensure efficient progress and completion within the designated timeframe.

2.5 Project Approvals

The project would be subject to the following approvals:

- Conditional Use Permit Modification

3 Initial Study Checklist

1. **Project title:**

   Desert Valley Hospital Emergency Department & Medical Surgery Building Addition

2. **Lead agency name and address:**

   City of Victorville
   14343 Civic Drive
   Victorville, California 92393

3. **Contact person and phone number:**

   Mina Morgan
   760.955.5100
   14343 Civic Drive
   Victorville, California 92393-5001

4. **Project location:**

   16850 Bear Valley Road
   Victorville, California 92395

5. **Project sponsor's name and address:**

   Prime Healthcare
   16850 Bear Valley Road
   Victorville, California 92395

6. **General plan designation:**

   Commercial

7. **Zoning:**

   General Commercial (C-2T)

8. **Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

   The proposed project consists of the construction of a new two-story building addition to the existing Desert Valley Hospital. As part of the project, a new Service Yard would be provided on site to accommodate utilities for the building addition. On-site and off-site improvements are planned as part of the project to accommodate additional parking spaces and efficient traffic flow. For additional information please refer to Chapter 2, Project Description, of this MND.

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

The project site is surrounded by vacant lots to the north, east, and west, with some existing development to the south and east. Beyond the vacant lots to the north and west, there are existing residential uses. Commercial uses are located to the south and east of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The project would require a plan check and a permit for the ED expansion with approval from the State Department of Health Care Access and Information.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Tribal consultation letters were sent out January 24, 2025. No tribes requested consultation, during the 30 day period to request consultation. .

Environmental Factors Potentially Affected

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

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Mina Morgan — 6-12-2025

Signature — Date

Evaluation of Environmental Impacts

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

3.1 Aesthetics

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

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista generally consists of a defined viewpoint that provides wide ranging views of a landscape. The current general plan does not identify or designate scenic vistas or viewsheds in the City of Victorville (City of Victorville 2008a). The project is located in an urbanized area and surrounded by existing development with patches of undeveloped lots in between. As described above, the project is surrounded by commercial land uses along Bear Valley Road and residential land uses across Jasmine Street. Additionally, the project site is an existing developed medical center. The proposed project would include an expansion of the existing ED and the construction of a Med Surg Unit. The two-story expansion would expand the current department by approximately 83,369 square feet. Due to the lack of designated scenic vistas or viewsheds near the project site, the project would have no impact to scenic vistas.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The California Department of Transportation designates official and eligible scenic highways within the state. According to the California State Scenic Highway System Map (Caltrans 2018), the only officially designated state scenic highway in San Bernardino County is a 16-mile portion of State Route 38 from South Fork Campground to State Lane. This roadway segment is located approximately 34 miles east of the project site in the San Bernardino Mountains. The closest eligible state scenic highway is State Route 173, located approximately 9.5 miles south of the project site. Based on this distance and intervening natural topography and constructed structures, the project site is not located within the viewshed of this officially designated state scenic highway. Therefore, implementation of the proposed project would not result in an impact related to scenic resources within a state scenic highway.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. Section 21071 of the California Public Resources Code (i.e., CEQA) defines an "urbanized area" as "(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." As of July 1, 2022, the U.S. Census Bureau estimated the population of the City to be 137,221 persons (U.S. Census Bureau 2023). Therefore, the City is located within an urbanized area as defined by CEQA.

To ensure that both current and future development within the City is designed and constructed to conform to the existing visual character and quality of the surrounding built environment, the City's Development Code includes design standards, specific to each Zoning District, related to building height, parking, landscaping requirements, and other visual considerations. The purpose of the standards is to regulate and restrict the uses of buildings and structures and to encourage the most appropriate use of land. The City's General Plan Land Use Map designates the project site as Commercial, and the City's Zoning Map shows the site zoned as General Commercial (C-2T) (City of Victorville 2023). The proposed project would be required to be developed in accordance with the existing land use and zoning designations. The project's consistency with these land use and zoning designations would be reviewed during the plan-check phase of project review. Therefore, because the project would be required to comply with all applicable regulations governing scenic quality, potential impacts would be less than significant.

Additionally, development of the project would be consistent with surrounding development and would not degrade the existing visual character of the project site and its surroundings. The project site is located in an area of the City used for commercial and residential purposes and is currently characterized as a hospital being operated for commercial purposes. Construction of the project would require the use of heavy machinery such as large trucks, cranes, bulldozers, and other equipment needed for construction activities. These activities would be temporary and would conclude with completion of construction of the project.

Once construction of the project is complete, the condition of the site would change from a parking lot and undeveloped site adjacent to the existing hospital to a two-story ED and Med Surge Unit building. The project would be built consistent with existing patterns of development in the surrounding area. In addition, the project would be subject to design review by the City and would be required to meet the City's conditions of approval, which would ensure that the proposed structure would be consistent with the City's General Plan and Municipal Code. Therefore, implementation of the proposed project consistent with the development standards in the City's Development Code, as required by the City's conditions of approval and as reviewed as part of the plan check process, would not substantially degrade the existing visual character or quality of the site or its surroundings or result in significant visual impacts. The project would be consistent with zoning design standards and would not conflict with any other zoning regulations; therefore, impacts would be less than significant.

d) ***Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

Less than Significant Impact. Victorville Municipal Code Section 16-3.10.060 provides guidelines for lighting within commercial zones within the City. Specifically, the lighting standards under subsection (A) require that excessive or incompatible impacts of noise, light, traffic, and visual character be minimized. Existing conditions at the project site consist of a medical complex that currently produces light from streetlights, pathway lights, exterior building lighting and signage, parking lot lighting, and vehicular lighting from vehicles entering and exiting the site. The emergency department is illuminated from sunset to sunrise (typically from 6:00 p.m. to 6:00 a.m. depending on the time of year) and is consistent with the Development Code. Sensitive receptors to lighting in proximity to the project site include the residential uses to the north of the project site, as well as the existing developments to the south and east.

Implementation of the project would result in the addition of more light associated with the building expansion, new parking lot, signage, street lighting, parking, building exteriors, and pathways on the project site. The building addition would use exterior material that has low reflectivity and would not be anticipated to result in new sources of glare. Despite the introduction of additional sources of light closer to the public view, lighting would be shielded downward and away from the street, reducing the impacts of the lighting to sensitive receptors. New sources of lighting would be located within the project site and would be shielded by existing parking structures and buildings currently on the medical campus. The new building expansion would be adjacent to Bear Valley Road. All lighting from the ED expansion would be shielded downward or towards the project away from Bear Valley Road.

In conclusion, lighting for the proposed project would be shielded by existing buildings or be directed away from sensitive receptors, roadways, and adjacent properties. Lighting from the project would be consistent with the Victorville Municipal Code. Project impacts from lighting and glare would be less than significant.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. **AGRICULTURE AND FORESTRY RESOURCES** – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the Department of Conservation's Farmland Mapping and Monitoring Program, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is designated as "Urban and Built-Up Land" and "Grazing Land" and surrounded by parcels designated "Grazing Land" to the north, east, and west, as well as parcels designated as "Urban and Built-Up Land" to the south. After the new addition to the hospital has been constructed, the site would not be used for grazing, and the surrounding land uses would make it difficult to graze on site. The project site is located in an urban area and there is no agricultural production in the vicinity of the project site (DOC 2018). There would be no impact to Farmland, Unique Farmland, or Farmland of Statewide Importance or to surrounding agricultural production.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned as General Commercial (C-2T) and is not zoned for agricultural uses. Additionally, the project does not contain a Williamson Act contract. No impact resulting from a conflict with existing zoning for agricultural use or a Williamson Act contract would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site is zoned as General Commercial (C-2T) and is not designated as a forestry resource. No impact to forestry resources would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site has been previously developed and would not result in the loss or conversion of forest land to a non-forest use. No impact would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project site has been previously developed and it surrounded by development. The project site zoning is designated as General Commercial (C-2T), and implementation of the project would be consistent within the allowed uses in this zone. No agricultural or forestry uses are in the surrounding vicinity of the project site. No impact would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

This section is based on technical analysis conducted by Dudek, including quantitative estimates of air pollutant emissions based on assumptions developed in consultation with the project applicant. The results of the emissions estimates are provided as Appendix A to this MND, Air Quality, Greenhouse Gas Emissions, and Energy Calculations.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The project site is located within the MDAB, which includes the desert portions of Los Angeles, Kern, San Bernardino, and Riverside Counties. The site is within the jurisdictional boundaries of the MDAQMD.

The Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the Mojave Desert 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. A project is non-conforming with an air quality plan if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable MDAQMD rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plans, and is consistent with the growth forecasts in the applicable plans (or is directly included in the applicable plan). Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, do not increase vehicle trips, and do not increase vehicle miles traveled (VMT) are also deemed to comply with the applicable air quality plan (MDAQMD 2020).

The Project would be required to comply with all applicable MDAQMD Rules and Regulations, including, but not limited to Rules 401 (Visibile Emissions), 402 (Nuisance), and 403 (Fugitive Dust Control for the Mojave Desert Planning Area). According to the City's General Plan, the land use designation and zoning for the project site is General Commercial (C-2T) and has a land use designation of Commercial. The project would be consistent with the Development Code requirements for the applicable zone, as it would expand existing healthcare services and improve infrastructure of the current hospital site. Furthermore, the project would be required to comply with all applicable regulations for the existing land use and zoning designation.

As discussed below, project construction-source emissions would not exceed applicable MDAQMD regional thresholds. Based on the preceding considerations, the project would conform to local land use plans and would comply with all applicable MDAQMD Rules and Regulations. On this basis, the project would not conflict with the Federal Particulate Matter Attainment Plan and Ozone Attainment Plan for the MDAB. Therefore, impacts associated with conflicting with the MDAQMD would be less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the MDAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used to determine whether a project's individual emissions would have a cumulatively considerable contribution to air quality. If a project's emissions would exceed the MDAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (MDAQMD 2020).

A quantitative analysis was conducted to determine whether the proposed project might result in emissions of criteria air pollutants that may cause exceedances of the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS), or cumulatively contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide, particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides, PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[1] the MDAB is designated as a nonattainment area for federal and state O_3 and PM_{10} standards (MDAQMD 2023). The MDAB is designated as an attainment area for federal and state CO, $PM_{2.5}$, and NO_2 standards, as well as for state sulfur dioxide standards. MDAB is also designated attainment for the state lead standard.[2]

1 An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare are set by EPA and CARB, respectively. Attainment = meets the standards; attainment/maintenance = achieves the standards after a nonattainment designation; nonattainment = does not meet the standards.

2 Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the MDAB is expected based on current monitoring data. The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

The proposed project would result in emissions of criteria air pollutants for which the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (EPA) have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause, or contribute to, violations of these standards. The MDAQMD has established Air Quality Significance Thresholds, as revised in February 2020, that set forth quantitative emission significance thresholds below which a project would not have a significant impact on ambient air quality (MDAQMD 2020). The quantitative air quality analysis provided herein applies the MDAQMD thresholds identified in Table 3.3-1 to determine the potential for the project to result in a significant impact under CEQA.

Table 3.3-1. MDAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds	
Pollutant	**Construction (Pounds per Day)**
VOCs	137
NO_x	137
CO	548
SO_x	137
PM_{10}	82
$PM_{2.5}$	65
Hydrogen sulfide[a]	54
Lead[a]	3
TACs and Odor Thresholds	
TACs[b]	Maximum incremental cancer risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic and acute hazard index ≥ 1.0 (project increment)
Odor	Project creates an odor nuisance pursuant to MDAQMD Rule 402
Ambient Air Quality Standards for Criteria Pollutants	
NO_2 1-hour average NO_2 annual arithmetic mean	MDAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) and 0.1 ppm (federal) 0.030 ppm (state) and 0.0534 ppm (federal)
CO 1-hour average CO 8-hour average	MDAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
PM_{10} 24-hour average PM_{10} annual average	MDAQMD is in **moderate nonattainment**[c]; project is significant if it causes or contributes to an exceedance of the following attainment standards: 50 $\mu g/m^3$ (state) and 150 $\mu g/m^3$ (federal) 20 $\mu g/m^3$ (state)
$PM_{2.5}$ 24-hour average $PM_{2.5}$ annual average	MDAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 35 $\mu g/m^3$ (federal) 12 $\mu g/m^3$ (state/federal)[d]

Table 3.3-1. MDAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds	
Pollutant	**Construction (Pounds per Day)**
O_3 maximum 1-hour concentration O_3 maximum 8-hour concentration	MDAQMD is in **nonattainment**; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.09 ppm (state) 0.07 ppm (state and federal)

Sources: CARB 2023; EPA 2023; MDAQMD 2023.

Notes: MDAQMD = Mojave Desert Air Quality Management District; VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; TAC = toxic air contaminant; NO_2 = nitrogen dioxide; ppm = parts per million by volume; μg/m³ = micrograms per cubic meter.

Greenhouse gas emissions thresholds for industrial projects were not include included in this table as they are addressed within the greenhouse gas emissions analysis and not the air quality analysis.

[a] The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

[b] TACs include carcinogens and noncarcinogens.

[c] The project is located in an area designated moderate nonattainment in the MDAB (San Bernadino County). PM_{10} areas that are out of attainment are first designated as moderate and have 6 years from the designation status to meet the standards, after which time the designation is changed to serious nonattainment.

[d] 12.0 μg/m³ is the federal primary standard, representing the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

The MDAQMD CEQA Air and Federal Conformity Guidelines (MDAQMD 2020) sets forth quantitative emission significance thresholds for criteria air pollutants below which a project would not have a significant impact on ambient air quality. Project-related air quality emissions estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 3.3-1 are exceeded. A project would potentially result in a cumulatively considerable net increase in O_3, which is a nonattainment pollutant, if the project's construction emissions would exceed the MDAQMD VOC or NO_x thresholds shown in Table 3.3-1. These emissions-based thresholds for O_3 precursors are intended to serve as a surrogate for an O_3 significance threshold (i.e., the potential for adverse O_3 impacts to occur). This approach is used because O_3 is not emitted directly, and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

California Emissions Estimator Model (CalEEMod) Version 2022.1.1.28 was used to estimate emissions from construction of the project. CalEEMod is a statewide computer model that was developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction and operational activities from a variety of land use projects, including residential development. The following discussion summarizes the quantitative project-generated construction emissions and impacts that would result from implementation of the proposed project. Detailed assumptions and results of this analysis are provided in Appendix A.

Construction

Construction of the project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., off-road construction equipment, on-road haul trucks, vendor trucks, and worker vehicle trips).

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Criteria air pollutant emissions associated with temporary construction activity were quantified using CalEEMod. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2025–2028). Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the project applicant and are intended to represent a reasonable scenario based on the best information available. Default values provided in CalEEMod were used where detailed project information was not available.

For purposes of estimating project emissions, and based on information provided by the project applicant, it is assumed that construction of the emergency department expansion would commence in July 2025[3] and would last approximately 30 months, ending in January 2028. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Demolition: 1 month
- Site preparation: 2 weeks
- Grading: 1 month
- Building construction: 26 months
- Paving: 1 month
- Architectural coating: 1 month

There are an estimated 14,068 square feet of existing structures, approximately 47,800 square feet of existing asphalt and sidewalks, and approximately 245,500 square feet of existing landscaping to be demolished and the resultant material hauled off site according to the project applicant. Assuming a haul truck capacity of 10 cubic yards of demolition debris and 14 cubic yards of soil export per truck, earth-moving activities would result in approximately 1,071 round trips (2,142 one-way truck trips) during the demolition phase. CalEEMod default trip length values were used for the distances for all construction-related trips. Construction worker, vendor, and haul truck trips are based on CalEEMod default assumptions where project specific information was not available.

The construction equipment mix and vehicle trips used for estimating the project-generated construction emissions are shown in Table 3.3-2.

3 The analysis assumes a construction start date of July 2025, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.3-2. Construction Scenario Assumptions

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Emergency Department						
Demolition	16	4	102	Concrete/Industrial Saws	1	8
				Rubber Tired Dozers	2	8
				Excavators	3	8
Site Preparation	18	4	0	Tactors/Loaders/ Backhoes	4	8
				Rubber Tired Dozers	3	8
Grading	16	4	42	Excavators	1	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/ Backhoes	3	8
Building Construction	28	14	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8
				Welders	1	8
				Tractors/Loaders/ Backhoes	3	7
Paving	18	0	0	Pavers	2	8
				Paving Equipment	2	8
				Rollers	2	8
Architectural Coating	6	0	0	Air Compressors	1	6

Notes: See Appendix A for details.

The project would implement dust control strategies as a project design feature. To reflect implementation of proposed dust control strategies in accordance with MDAQMD Rule 403, the following was assumed in CalEEMod:

- Water exposed area twice times per day (55% reduction in PM_{10} and $PM_{2.5}$).
- Limit vehicle speeds on unpaved roads to 25 mph.

Implementation of the project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The project would implement various dust control strategies and would be required to comply with MDAQMD Rule 403 to control dust emissions generated during the grading activities. Proposed construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites and unpaved roads two times per day depending on weather conditions and limiting vehicle speeds on unpaved roads. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, NO_x, CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the project applicant has proposed the use of non-VOC architectural coatings, which are represented with a VOC content of 5 grams per liter for the emissions analysis. Additionally, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of MDAQMD's Rule 1113 (Architectural Coatings).

Table 3.3-3 presents the estimated maximum daily construction emissions generated during construction of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix A.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2025	3.41	31.86	31.73	0.08	11.94	5.26
2026	1.22	10.41	15.31	0.03	0.87	0.47
2027	1.17	9.92	15.11	0.03	0.83	0.43
Maximum Daily Emissions	**3.41**	**31.86**	**31.73**	**0.08**	**11.94**	**5.26**
MDAQMD Threshold	*137*	*137*	*548*	*137*	*82*	*65*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; MDAQMD = Mojave Desert Air Quality Management District.
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect compliance with MDAQMD Rule 1113 (Architectural Coatings) and implementation of the project's fugitive dust control strategies, including watering of the project site and unpaved roads two times per day.

As indicated in Table 3.3-3, maximum daily construction emissions would not exceed the MDAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. As such, impacts would be less than significant.

Operation

Following the completion of construction activities, the project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources including vehicular traffic generated by patients, visitors, physicians/staff, and emergency vehicles (i.e., ambulance); area sources (space heating, water heating, landscaping); and stationary sources including diesel generators, hot water boilers, steam boilers, and a cooling system.

Emissions from the operational phase of the project were estimated using CalEEMod Version 2022.1.1.28 using a combination of CalEEMod default assumptions and project-specific information where available. An operational year of 2028 was assumed consistent with completion of project construction for each phase. Criteria air pollutant emissions sources and associated assumptions are discussed below.

Area Sources

CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape maintenance equipment. Emissions associated with natural gas usage in space heating and water heating are calculated in the building energy use module of CalEEMod, as described in the following text.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products (CAPCOA 2022). Consumer product VOC emissions are estimated in CalEEMod based on the floor area of non-residential buildings and on the default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers using during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. The VOC emission factor is based on the VOC content of the surface coatings, and MDAQMD's Rule 1113 (Architectural Coatings) governs the VOC content for interior and exterior coatings. The model default reapplication rate of 10% of area per year is assumed. Consistent with CalEEMod defaults, it is assumed that the surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2022). Similar to construction, a VOC content of 5 grams per liter was assumed, as the applicant proposes to use non-VOC coatings.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers. The emissions associated with landscape equipment use are estimated based on CalEEMod default values for emission factors (grams per square foot of building space per day) and number of summer days (when landscape maintenance would generally be performed) and winter days. For the MDAB, the average annual number of summer days is estimated at 180 days (CAPCOA 2022).

Energy Sources

As represented in CalEEMod, energy sources include emissions associated with building electricity and natural gas usage (non-hearth). Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for greenhouse gases (GHGs) in CalEEMod, since criteria pollutant emissions occur at the power plant, which is typically off site.

CalEEMod default values for energy consumption for the land uses were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end-use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the heating, ventilation, and air conditioning [HVAC] system; water heating system; and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous “plug-in” uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California’s building standards. The current Title 24, Part 6 standards, referred to as the 2022 Title 24 Building Energy Efficiency Standards, became effective on January 1, 2023. The Title 24 2022 standards are assumed within CalEEMod (CAPCOA 2022). As of January 1, 2020, Title 24, Part 6, applies to hospitals.

Mobile Sources

The project would impact air quality through the vehicular traffic generated by the project. Emissions associated with project-generated daily traffic were modeled using the Institute of Transportation Engineers land use code 610 (hospital) (number of beds) using the number of beds in the ED expansion. CalEEMod was utilized to estimate daily emissions from proposed vehicular sources. CalEEMod default data, including temperature, trip characteristics, and variable start information, were conservatively used for the model inputs.

Table 3.3-4 presents the maximum daily area, energy, off-road equipment, and mobile source emissions associated with operation (year 2028) of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix A.

Table 3.3-4. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions – Unmitigated

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Area	2.43	0.03	3.62	<0.005	0.01	<0.005
Energy	0.07	1.36	1.14	0.01	0.10	0.10
Mobile	3.80	3.24	28.03	0.07	5.91	1.53
Stationary	11.00	49.20	28.05	0.05	1.62	1.62
Total	**17.30**	**53.83**	**60.84**	**0.13**	**7.64**	**3.25**
MDAQMD Threshold	*137*	*137*	*548*	*137*	*82*	*65*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; MDAQMD = Mojave Desert Air Quality Management District.
See Appendix A for complete results.
Totals may not sum due to rounding.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 3.3-4, the combined daily area, energy, off-road, and mobile source emissions would not exceed the MDAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Therefore, the project would result in a less-than-significant impact during operation.

Health Effects of Other Criteria Air Pollutants

Construction and operation of the project would generate criteria air pollutant emissions. However, due to the nature of the project and the short duration of construction, which would last approximately 30 months, the project would not exceed the MDAQMD mass-emission thresholds, as shown in Tables 3.3-3 and 3.3-4.

The MDAB is designated as nonattainment for O_3 for the NAAQS and CAAQS. VOCs and NOx are precursors to O_3. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of VOCs and NOx to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the MDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Because construction and operation of the project would not exceed MDAQMD thresholds for NO_x or VOC, implementation of the project would minimally contribute to regional O_3 concentrations and the associated health effects.

Construction and operation of the project would not contribute to exceedances of the NAAQS and CAAQS for NO_2. Health effects that result from NO_2 and NO_x include respiratory irritation, which could be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. Project construction would be relatively short term, and off-road construction equipment would be operating at various portions of the site and would not be concentrated in one portion of the site at any one time. In addition, existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Operation of the project would not create substantial, localized NO_x impacts.

Construction and operation of the project would also not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or obstruct the MDAB from coming into attainment for these pollutants. Additionally, the project would implement dust control strategies and be required to comply with MDAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction and operation, the project is not anticipated to result in health effects associated with PM_{10} or $PM_{2.5}$, and thus the impact would be less than significant.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to MDAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, and medical facilities.

The closest off-site sensitive receptors to the project site is a single-family residence located approximately 76 meters (250 feet) south of the project site.

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed "CO hotspots." The transport of CO is extremely limited, as it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (level of service E or worse is unacceptable). Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

Although the MDAQMD does not have screening levels for intersection traffic that could result in potential CO hotspots, several other air districts have established these levels, which are described below to provide context of the magnitude of hourly volumes that could result in significant localized CO. The South Coast Air Quality Management District (SCAQMD) has guidance stating CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day (SCAQMD 2003). San Bernardino County's Programmatic EIR cites traffic volumes at a single intersection of over 44,000 vehicles an hour, or 24,000 vehicles an hour where vertical and horizontal air does not mix, as the threshold above which significant CO impacts may occur (San Bernardino County 2019). The project's estimated vehicle trips anticipated during construction are minimal and not of a magnitude expected to raise the traffic volumes at intersections within proximity of the project to the 100,000 vehicles per day, resulting in a CO hotspot. According to the project's Traffic Analysis (available as Appendix I) the project would generate 862 daily trips, well below both the SCAQMD threshold and the City's thresholds.

Given the considerably low level of CO concentrations in the project area and the minimal increase in daily trips, project-related mobile emissions are not expected to contribute significantly to CO concentrations, and a CO hotspot is not anticipated to occur. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the MDAB is steadily decreasing. The project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Valley Fever

Valley fever is not highly endemic to San Bernardino County, with an incident rate of 1.8 cases per 100,000 people (CDPH 2022). In contrast, in 2016 the statewide annual incident rate was 13.7 per 100,000 people. The California counties considered highly endemic for valley fever include Kern (251.7 per 100,000), Kings (157.3 per 100,000), San Luis Obispo (82.8 per 100,000), Fresno (60.8 per 100,000), Tulare (45.3 per 100,000), Madera (31.5 per 100,000), and San Joaquin (25.3 per 100,000); these counties accounted for 70% of the reported cases in 2016 (CDPH 2022).

Even if present at the site, construction activities may not result in increased incidence of valley fever. Propagation of valley fever is dependent on climatic conditions, with the potential for growth and surface exposure highest following early seasonal rains and long dry spells. Valley fever spores can be released when filaments are disturbed by earth-moving activities, although receptors must be exposed to and inhale the spores to be at increased risk of developing valley fever. Moreover, exposure to valley fever does not guarantee that an individual will become ill—approximately 60% of people exposed to the fungal spores are asymptomatic and show no signs of an infection (USGS 2000).

To reduce fugitive dust from the project and minimize adverse air quality impacts, the project would employ dust control measures in accordance with the MDAQMD Rules 401 and 403.2, which limit the amount of fugitive dust generated during construction. These requirements are consistent with California Department of Public Health recommendations for the implementation of dust control measures, including regular application of water during soil-disturbance activities, to reduce exposure to valley fever by minimizing the potential that the fungal spores become airborne (CDPH 2013). Further, regulations designed to minimize exposure to valley fever hazards are included in Title 8 of the California Code of Regulations and would be complied with during the project's construction phase (California Department of Industrial Relations 2017).

In summary, the project would not result in a significant impact attributable to valley fever exposure based on its geographic location and compliance with applicable regulatory standards and dust control measures, which will serve to minimize the release of and exposure to fungal spores. Therefore, impacts associated with valley fever exposure for sensitive receptors would be less than significant.

Health Impacts of Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions during project construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks, as well as DPM and TAC emissions from stationary sources during the project's operation. Use of heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions and use of diesel trucks is also subject to an Airborne Toxics Control Measure. The health risk assessment (HRA) analyzes long-term cancer and noncancer health risk from the project's use of diesel equipment and trucks during construction, as well as from the operation of a diesel-fueled emergency generator, natural gas-fired hot water heaters, and natural gas-fired boilers.

Construction Health Risk

An HRA was performed to evaluate potential health risk associated with construction of the project. The following discussion summarizes the dispersion modeling and HRA methodology; supporting construction HRA documentation, including detailed assumptions, is presented in Appendix B.

For risk assessment purposes, PM_{10} in diesel exhaust is considered DPM, originating mainly from off-road equipment operating at a defined location for a given length of time at a given distance from sensitive receptors. Less-intensive, more-dispersed emissions result from on road vehicle exhaust (e.g., heavy-duty diesel trucks).

The air dispersion modeling methodology was based on MDAQMD's generally accepted modeling practices (MDAQMD 2020). Air dispersion modeling was performed using EPA's American Meteorological Society/EPA Regulatory Model (AERMOD) Version 23132 modeling system (computer software) with the Lakes Environmental Software implementation/user interface, AERMOD View Version 12.0.0. The HRA followed the Office of Environmental Health Hazard Assessment 2015 guidelines (OEHHA 2015) and MDAQMD guidance to calculate the health risk impacts at all proximate receptors, as discussed below. The dispersion modeling included the use of standard regulatory default options. AERMOD parameters were selected consistent with the MDAQMD and EPA guidance and identified as representative of the project site and project activities. Principal parameters of this modeling are presented in Table 3.3-5.

Table 3.3-5. AERMOD Principal Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Barstow-Daggett Airport air monitoring station (KDAG) were used for the dispersion modeling based on the location of the project. A meteorological dataset from 2015 through 2020 was obtained from CARB in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	The rural dispersion option was selected due to the undeveloped nature of the project site.
Terrain Characteristics	Digital elevation data were imported into AERMOD and elevations were assigned to receptors and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View in the U.S. Geological Survey's National Elevation Dataset format.
Elevation Data	Air dispersion modeling of DPM emissions was conducted assuming the off-road equipment and trucks would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix B), based on the best information available at the time of analysis. Off-road construction equipment was modeled as a line of adjacent volume sources across the project site with a release height of 5 meters, a plume height of 10 meters, and plume width of 9 meters.
Source Release Characterizations	Discrete receptors were placed at the nearest receptor locations in all directions to the project site at 50 meter spacing.

Notes: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; CARB = California Air Resources Board; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model.
See Appendix B.

The health risk calculations were performed using the Hotspots Analysis and Reporting Program Version 2 (HARP2) Air Dispersion and Risk Tool (Version 22118). AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the necessary input values for HARP2. The line of volume sources was partitioned evenly based on the 1 gram per second emission rate. The ground-level concentration plot files were then used to estimate the long-term cancer health risk to an individual and the non-cancer chronic health indices. There is no reference exposure level for acute health impacts from DPM, and thus, acute risk was not evaluated.

Table 3.3-6. Construction Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	3.49	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.0019	1.0	Less than Significant

Source: Appendix B.
Notes: CEQA = California Environmental Quality Act.

As shown in Table 3.3-6, project construction activities would result in a Maximum Individual Cancer Risk of 3.49 in 1 million at the nearest residence, which is less than the significance threshold of 10 in 1 million. Project construction would result in a Chronic Hazard Index of 0.0019, which is below the 1.0 significance threshold. Therefore, project construction TAC health risk impacts would be less than significant.

Operational Health Risk

For the operational health risk, the operation year 2028 was assumed consistent with completion of project construction. Emissions from operation of the project result from a 1,250-kilowatt diesel-fired emergency generator, two 0.3 metric million British thermal units per hour natural gas fired domestic hot water heaters, and three 2.0 metric million British thermal units per hour natural gas hot water boilers, of which one unit remains on standby. The HRA included the analysis of DPM emissions from the emergency generator and TACs resulting from the combustion of natural gas emitted from the operation of the domestic hot water heaters and hot water boilers. Details of the emissions and stationary source release characteristics used in the AERMOD and HARP2 models are provided in Appendix B. All stack heights were assumed to be 48 inches (4 feet) above the height of the Utility Service Building rooftop (15 feet 8 inches).

Dudek evaluated the project's potential cancer and noncancer health impacts using exposure periods appropriate to evaluate long-term emission increases (third trimester of pregnancy to 30 years). Emissions dispersion was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2. The HRA results were then compared to MDAQMD thresholds to assess project significance. Principal parameters of this modeling are presented in Table 3.3-7.

Table 3.3-7. Operational Health Risk Assessment AERMOD Operational Principal Parameters

Parameter	Details
Meteorological Data	AERMOD-specific meteorological data for the Barstow-Daggett Airport air monitoring station (KDAG) were used for the dispersion modeling based on the recommendation of the MDAQMD. A meteorological dataset from 2015 through 2020 was obtained from CARB in a preprocessed format suitable for use in AERMOD.
Urban versus Rural Option	The rural dispersion option was selected due to the undeveloped nature of the project site.
Terrain Characteristics	Digital elevation data were imported into AERMOD and elevations were assigned to receptors and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View in the U.S. Geological Survey's National Elevation Dataset format.
Source Release Characterizations	Details of the emissions and stationary source release characteristics used in the AERMOD and HARP2 models are provided in Appendix B. All stack heights were assumed to be 48 inches (4 feet) above the height of the Utility Service Building rooftop (15 feet 8 inches).
Receptors	Discrete receptors were placed at the nearest receptor locations in all directions to the project site at 50 meter spacing.

Source: See Appendix B.
Note: AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; MDAQMD = Mojave Desert Air Quality Management District; CARB = California Air Resources Board; HARP2 = Hotspots Analysis and Reporting Program Version 2.

Table 3.3-8. Operational Health Risk Assessment Results

Units	Unit	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk – Residential	Per Million	0.16	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.00007	1.0	Less than Significant

Source: Appendix B.
Notes: CEQA = California Environmental Quality Act.

As shown in Table 3.3-8, the DPM emissions from operation of the project would result in a Maximum Individual Cancer Risk of 0.16 in 1 million and a Chronic Hazard Index of 0.00007. As such, both the Maximum Individual Cancer Risk and the Chronic Hazard Index would be below the significance thresholds. Therefore, potential impacts associated with exposure of sensitive receptors to TACs would be less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people.

The project would also be required to comply with MDAQMD Rule 402 (Nuisance). Rule 402 provides that "[a] person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property" (MDAQMD 1976). Based on the preceding, the potential for the project to create objectionable odors affecting a substantial number of people would be less than significant. Therefore, impacts associated with odors during construction would be less than significant.

3.4 Biological Resources

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

The following analysis is based on the Biological Technical Report prepared for the proposed project by Dudek that is included as Appendix C.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated. The project site currently consists of a hospital campus and empty lot. The project site is surrounded by vacant lots to the north, east, and west, with existing development to the south and east. Figure 6, Impacts to Biological Resources, shows the biological resources onsite as well as the resources that would be impacted by the project.

Special-Status Plants

The California Natural Diversity Database and the California Native Plant Survey inventory were queried for the project site's U.S. Geological Survey 7.5-minute quadrangle (i.e., Hesperia) and the eight surrounding quadrangles (i.e., Apple Valley North, Silverwood Lake, Lake Arrowhead, Apple Valley South, Victorville, Baldy Mesa, Adelanto, and Cajon). The U.S. Fish and Wildlife Service's Information for Planning and Consultation database was also consulted for the biological study area (BSA) (project footprint plus a 100-foot buffer) (CDFW 2024; CNPS 2024; USFWS 2024). These searches resulted in a list of 27 special-status plant species. One special-status plant species, western Joshua tree, a candidate for state listing under the California Endangered Species Act, was detected within the project's BSA. Six individual western Joshua trees were found within the BSA.

Direct Impacts

Two (2) western Joshua trees would be directly impacted by the project. All ground-disturbing activities are considered permanent direct impacts to western Joshua trees where the development footprint and off-site improvements overlap with the on-site trees. Direct impacts to western Joshua tree would be potentially significant. Based on the Western Joshua Tree Conservation Act, California Fish and Game Code Section 1927.3 requires an applicant to mitigate impacts by paying the statutorily prescribed fees. The project would result in direct impacts to two Joshua trees that are 1 meter or greater but less than 5 meters in height.

The project applicant would implement **Mitigation Measure (MM) BIO-1**, which would mitigate for direct impacts to two western Joshua trees, their seed bank, and associated habitat. **MM-BIO-1** would fulfill mitigation through conservation of western Joshua trees through a payment of fees consistent with the Western Joshua Tree Conservation Act or through payment to a California Department of Fish and Wildlife (CDFW) approved mitigation bank.

Furthermore, the implementation of **MM-BIO-2** (Biological Monitoring and Best Management Practices) gives the project biologist the authority to stop work if construction is not compliant with this CEQA document; requires that a qualified biologist oversee compliance with the protective measures, including limiting impacts to the project footprint; and provides construction personnel with training related to special-status plant species that occur adjacent to the impact footprint. Additionally, **MM-BIO-3** (Delineation of Property Boundaries) requires that impacts occur within the fenced, staked, or flagged area that is clearly delineated within the project impact footprint. The construction crew would be responsible for unauthorized impacts from construction activities to special-status plants that are outside the permitted project footprint.

Therefore, implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3** would reduce potential direct impacts to western Joshua trees to less than significant.

Indirect Impacts

Two (2) western Joshua trees were mapped within the 50-foot buffer outside of the project footprint and would be preserved in place. Although these trees would not be directly impacted, implementation of the project may result in indirect impacts to these western Joshua trees. No non-listed special-status plant species were observed or have moderate to high potential to occur within the BSA; therefore, the project would have no indirect impacts to non-listed special-status plant species.

Construction-related, short-term indirect impacts to western Joshua trees may include dust accumulation, stormwater erosion and sedimentation, chemical spills, and inadvertent spillover impacts outside of the construction footprint. Potential long-term (post-construction) indirect impacts from operation and maintenance activities may include effects of herbicides, changes in water quality, increased demand of the surrounding area, increased traffic and vehicle emissions, and accidental chemical spills. Indirect impacts to Joshua trees would be potentially significant.

To reduce fugitive dust resulting from project construction and to minimize adverse air quality impacts, the project applicant would employ dust mitigation measures in accordance with MDAQMD Rules 401 and 403.2, which limit the amount of fugitive dust generated during construction.

A stormwater pollution prevention plan would be prepared and implemented to prevent all construction pollutants from contacting stormwater during construction activities, with the intent of keeping sediment and any other pollutants from moving off site and into receiving waters. Best management practice (BMP) categories employed on site would include erosion control, sediment control, and non-stormwater good housekeeping. Preparation and implementation of a stormwater pollution prevention plan would help to avoid and minimize the potential effects of stormwater erosion during construction.

Implementation of low-impact-development features and BMPs would, to the maximum extent practicable, reduce the discharge of pollutants into receiving waters, including inadvertent release of pollutants (e.g., hydraulic fluids and petroleum); the improper management of hazardous materials, trash, and debris; and the improper management of portable restroom facilities (e.g., regular service), in accordance with all relevant local and state development standards. Therefore, impacts to special-status plants due to changes in water quality would be avoided and minimized through the implementation of low-impact-development features and BMPs.

Western Joshua trees that are proposed to remain in place but are located within 50 feet of the disturbance footprint may result in indirect impacts due to disturbance of the root system and seed bank. These indirect impacts to western Joshua tree would be potentially significant. Based on the Western Joshua Tree Conservation Act, California Fish and Game Code Section 1927.3 requires an applicant to also mitigate impacts by paying the statutorily prescribed fees for indirect impacts within 50 feet in addition to trees directly impacted. The project would result in indirect impacts to two Joshua trees that are 1 meter or greater but less than 5 meters in height.

Implementation of MM-BIO-1 would mitigate for indirect impacts to the two western Joshua trees, their seed bank, and associated habitat. MM-BIO-1 would fulfill mitigation through conservation of western Joshua trees through a payment of fees consistent with the Western Joshua Tree Conservation Act or through payment to a California Department of Fish and Wildlife (CDFW) approved mitigation bank.

In addition, MM-BIO-2 requires that a qualified biologist oversee compliance with BMPs. MM-BIO-3 requires that impacts occur within the fenced, staked, or flagged area that is clearly delineated so that no impacts occur outside of the impact footprint. Lastly, the Joshua Tree Plan (included as Appendix A of Appendix C) provides measures for protecting the remaining western Joshua trees, such as the establishment of a tree-protection zone (crown/canopy plus 6 feet), protective fencing and signage, pre-construction meetings, measures for protection and maintenance during construction, and procedures for maintenance after construction. Accordingly, implementation of the Joshua Tree Plan, MM-BIO-1, MM-BIO-2, and MM-BIO-3 would reduce potential indirect impacts to western Joshua tree to less than significant.

Special-Status Wildlife

The California Natural Diversity Database was queried for the project site's U.S. Geological Survey 7.5-minute quadrangle (i.e., Hesperia) and the eight surrounding quadrangles (i.e., Apple Valley North, Silverwood Lake, Lake Arrowhead, Apple Valley South, Victorville, Baldy Mesa, Adelanto, and Cajon). The U.S. Fish and Wildlife Service Information for Planning and Consultation database was also consulted for the BSA (CDFW 2024; USFWS 2024). These searches resulted in a list of 36 special-status wildlife species. Desert kit fox (*Vulpes macrotis arsipus*) and mountain lion (*Puma concolor*) were also included in the special-status wildlife species assessment. No special-status wildlife species were detected within the BSA during surveys for the project. However, the following two special-status wildlife species have a moderate potential to occur within the BSA due to presence of suitable habitat and site conditions: burrowing owl (*Athene cunicularia*) and loggerhead shrike (*Lanius ludovicianus*). Impacts would be significant if injury or mortality of these special-status wildlife species were to occur as a result of construction activities.

The BSA does not occur within federally designated critical habitat for any special-status species; therefore, there would be no direct impacts to critical habitat.

Direct Impacts

Burrowing Owl

Protocol burrowing owl surveys were negative; however, burrowing owl has a moderate potential to occur due to the presence of suitable nesting and overwintering habitat (e.g., disturbed habitat and desert habitat), numerous documented occurrences in the vicinity, and the presence of suitable burrows. Therefore, burrowing owl could breed or overwinter within the BSA immediately prior to the start of construction.

Direct impacts could occur to burrowing owl if nesting or overwintering individuals were to occur within the BSA during construction. Construction activities could cause the disruption of breeding activities or mortality and injury to individuals in burrows, if present within the disturbance footprint. Pursuant to the California Fish and Game Code and Migratory Bird Treaty Act (MBTA), a pre-construction survey in compliance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) would be necessary to reevaluate the presence of breeding or overwintering burrowing owl and/or occupied burrows within the project limits, so take of owls or active owl nests can be avoided. MM-BIO-4 (Pre-Construction Burrowing Owl Survey and Avoidance) would require a pre-construction survey for burrowing owl in areas supporting potentially suitable habitat within 14 days prior to the start of construction activities. Additionally, MM-BIO-5 (Pre-Construction Nesting Bird Survey and Avoidance) would require that vegetation removal activities be conducted outside the general bird nesting season (February 1 through August 31). If vegetation removal must take place during the nesting bird season, a pre-construction nesting bird survey by a qualified biologist is required prior to vegetation removal. Furthermore, MM-BIO-2 requires that a qualified biologist conduct pre-construction sweeps ahead of each day of construction with ground disturbance or vegetation removal and provide construction personnel with training related to special-status wildlife species that may potentially occur within the project site.

Accordingly, implementation of MM-BIO-2, MM-BIO-4, and MM-BIO-5 would reduce potential direct impacts to burrowing owl to less than significant.

Loggerhead shrike

Loggerhead shrike was determined to have a moderate potential to occur in the BSA due to suitable foraging and nesting habitat present on site. Additionally, loggerhead shrike has been documented in the vicinity of the BSA along the Mojave River (CDFW 2024). Direct impacts could occur to loggerhead shrike if nesting individuals are present within the BSA during construction. Construction activities could cause disruptions to breeding activities and mortality or injury to nestlings or brooding individuals if present in vegetation being removed. Harm to or loss of active nests or individuals as a result of construction activities would be potentially significant.

To avoid potential direct impacts to nesting loggerhead shrike, vegetation removal activities would be conducted outside the general bird nesting season (February 1 through August 31). If vegetation must be removed during bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required prior to vegetation removal. This requirement is outlined in MM-BIO-5. Furthermore, MM-BIO-2 requires that a qualified biologist conduct pre-construction sweeps ahead of each day of construction with ground disturbance or vegetation removal and provide construction personnel with training related to special-status wildlife species that may potentially occur within the project site. Accordingly, implementation of MM-BIO-2 and MM-BIO-5 would reduce potential direct impacts to loggerhead shrike to less than significant.

Indirect Impacts

Indirect impacts to special-status wildlife species are those that occur during construction to species present near the site but not within the construction zone. Such impacts include fugitive dust that can degrade habitat and result in health implications for wildlife species; noise and vibration that can stress wildlife species or cause them to leave an area of otherwise suitable habitat or that can result in the disruption of bird nesting and abandonment of nests; increased human presence, which can also disrupt daily activities of wildlife and cause them to leave an area; and generation of trash, such as food packaging and cigarette butts, and debris from construction-related materials, which can degrade wildlife habitat and can attract nuisance and pest species. Implementation of the project could result in significant indirect impacts to special-status wildlife species absent mitigation.

MM-BIO-2 would require ongoing biological monitoring and compliance with all biological resource BMPs. To reduce fugitive dust resulting from project construction and to minimize adverse air quality impacts, the project would employ dust mitigation measures in accordance with MDAQMD Rules 401 and 403.2, which would limit the amount of fugitive dust generated during construction. In addition, pre-construction surveys as required by **MM-BIO-4** and **MM-BIO-5** would require establishment of construction buffers around any occupied burrows or active nests found, thus limiting effects from most indirect impacts, including noise and vibration, increased human presence, and fugitive dust. Accordingly, **MM-BIO-2**, **MM-BIO-4**, and **MM-BIO-5** would reduce potential indirect impacts to special-status wildlife to less than significant.

Nesting Migratory Birds and Raptors

Direct Impacts

The BSA contains trees, shrubs, and other vegetation suitable for birds of prey (raptors) and other avian species to nest on site. Native nesting bird species with the potential to occur within the BSA are protected by California Fish and Game Code Sections 3503 and 3503.5 and by the federal MBTA (16 USC 703–711). In particular, California Fish and Game Code Section 3503 provides that it is unlawful to take, possess, or needlessly destroy the active nests or eggs of any bird in California; Section 3503.5 protects all raptors and their eggs and active nests; and the MBTA prohibits the take (including killing, capturing, selling, trading, and transport) of native migratory bird species throughout the United States. Currently, California considers any nest that is under construction or modification or is supporting eggs, nestlings, or juveniles as "active." Therefore, impacts to nesting migratory birds and raptors would be potentially significant.

To ensure compliance with the California Fish and Game Code and MBTA and to avoid potential impacts to nesting birds, vegetation removal activities would be conducted outside the general bird nesting season (February 1 through August 31). If vegetation must be removed during bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required prior to vegetation removal. This requirement is outlined in **MM-BIO-5**.

Accordingly, the implementation of **MM-BIO-5** would reduce potential direct impacts to nesting migratory birds and raptors to less than significant.

MM-BIO-1 Western Joshua Tree Fee Payment. Mitigation for direct impacts to two western Joshua trees and indirect impacts to two western Joshua trees less than 5 meters but greater than 1 meter in height will be fulfilled through attainment of a Western Joshua Tree Conservation Act (WJTCA) Incidental Take Permit (ITP) prior to their removal and payment of the elected fees as described in Section 1927.3 of the WJTCA. In conformance with the standard fee schedule prescribed for the project area, mitigation will consist of payment of $2,500 for each western Joshua tree 5 meters or greater in height, $500 for each western Joshua tree less than 5 meters but greater than 1 meter in height, and $340 for each western Joshua tree less than 1 meter in height. California Department of Fish and Wildlife (CDFW) determines the final fee. Alternatively, mitigation will occur through off-site conservation, through a CDFW-approved mitigation bank, or as required by a Section 2081 ITP, if received. The project shall implement relocation specifications and tree protection measures provided in The Joshua Tree Preservation, Protection, and Relocation Plan (Joshua Tree Plan) for this project (Appendix A of BTR).

Other local regulations (i.e., City of Victorville Municipal Code Chapter 13.33 California Desert Native Plants Act, Food and Agricultural Code, Division 23)) also require permitting or notification prior to removal of western Joshua trees. Therefore, the project applicant must also receive written consent from the City of Victorville's director of Parks and Recreation or their designee prior to the removal or relocation of western Joshua trees in accordance with City of Victorville Municipal Code Chapter 13.33, Preservation and Removal of Joshua Trees. Additionally, the project applicant shall obtain a permit through San Bernardino County and pay fees pursuant to the California Desert Native Plants Act, Sections 80001-80201, for all western Joshua trees to be removed prior to the issuance of grading permits.

MM-BIO-2 Biological Monitoring and Best Management Practices. To prevent impacts to areas outside the limits of disturbance, a qualified biologist shall be present on site to monitor during initial ground disturbance or vegetation removal activities. Biological monitoring shall include the following tasks and responsibilities:

- The monitoring biologist shall have authority to immediately stop any activity that does not comply with the biological mitigation measures and/or to order any reasonable measure to avoid the unauthorized take of a western Joshua tree or any other special-status species that may occur during construction.
- Conduct a pre-construction briefing at the tailgate with construction personnel prior to vegetation removal or initial ground disturbance to outline the biological resources present, prohibition of littering, locations of covered trash receptacles, disturbance limits, and procedures/training for minimizing harm to or harassment of wildlife encountered during construction.
- Conduct pre-construction sweeps where construction work is scheduled for the day. Flush wildlife species from occupied areas immediately prior to vegetation-clearing and earth-moving activities during pre-construction sweeps.
- If slow-moving and/or fossorial special-status species that do not easily flush are detected in the work area, the biologist will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area but as close to their origin as possible. All wildlife moved during project activities shall be documented by the biologist on site.
- Verify that the construction contractor Qualified SWPP Practitioner is implementing the stormwater pollution prevention plan and maintaining physical best management practices. Perform regular inspections of fencing and erosion control measures (daily during rain events, if safe).
- Supervise and conduct regular spot checks during construction work, focusing on areas determined to have potential to support special-status species (as determined by a qualified biologist), to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved.
- Ensure avoidance of western Joshua trees to be preserved in place. Prior to the commencement of construction, a qualified biologist shall flag (using highly visible fluorescent flagging tape) western Joshua tree within a 100-foot buffer for avoidance.

- Periodically monitor the construction site to see that dust is minimized. If the biological monitor determines that dust may adversely affect nearby special-status species, the monitor shall require the construction personnel to implement best available control measures to reduce dust. Examples of such best available control measures include periodic watering of work areas, application of environmentally safe soil stabilization materials, and/or roll compaction.

MM-BIO-3 Delineation of Property Boundaries. Prior to ground disturbance activities, the contractor shall, in consultation with the biological monitor, clearly delineate the boundaries with fencing, stakes, or flags, consistent with the grading plan, within which the impacts will take place. All impacts outside the fenced, staked, or flagged areas shall be avoided, and all fencing, stakes, and flags shall be maintained until the completion of impacts in that area.

MM-BIO-4 Pre-Construction Burrowing Owl Survey and Avoidance. A pre-construction burrowing owl survey shall be completed no more than 14 days before initiation of site preparation or grading activities. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction surveys, the project site shall be re-surveyed. Surveys for burrowing owl shall be conducted by a qualified biologist in accordance with protocols established in the Staff Report on Burrowing Owl Mitigation prepared by the California Department of Fish and Game (now California Department of Fish and Wildlife [CDFW]) in 2012 or current version.

If burrowing owls are detected, a Burrowing Owl Relocation Plan shall be implemented in consultation with CDFW. As part of the Burrowing Owl Relocation Plan, disturbance to burrows shall be avoided during the nesting season (February 1 through August 31). Buffers will be established around occupied burrows as determined by a qualified biologist. No project activities shall be allowed to encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place until it is determined that occupied burrows have been vacated or the nesting season has completed.

Outside of the nesting season, passive owl relocation techniques approved by CDFW shall be implemented. Owls shall be excluded from burrows in the immediate project area and within a buffer zone by installing one-way doors in burrow entrances if there is a threat to the surface or subterranean burrow structure. These doors will be placed at least 48 hours prior to ground-disturbing activities. The project area shall be monitored daily for 1 week to confirm owl departure from burrows prior to any ground-disturbing activities. Compensatory mitigation for permanent loss of owl habitat will be provided following the guidance in the CDFW's 2012 Staff Report on Burrowing Owl Mitigation or current version.

Where possible, burrows will be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible plastic pipe shall be inserted into the tunnels during excavation to maintain an escape route for any wildlife inside the burrow.

If the above measures are followed, it is assumed that the project shall not need to obtain authorization from CDFW through the California Endangered Species Act Incidental Take Permit (ITP) process. If the burrows cannot be avoided during the nesting season, as outlined in this measure, the project applicant will consult with CDFW regarding the need to obtain an ITP. Any measures determined to be necessary through the permit process to offset impacts to burrowing owl may supersede measures provided in this CEQA document and shall be incorporated into the relocation plan.

In the event an ITP is needed, mitigation for direct impacts to burrowing owl habitat will be fulfilled through compensatory mitigation at a minimum 1:1 in-kind habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the permit process. Mitigation will be accomplished either through off-site conservation or through a CDFW-approved mitigation bank. If mitigation is not purchased through a mitigation bank and lands are conserved separately, a cost estimate will be prepared to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record will consider all management activities required in the ITP to fulfill the requirements of the conservation easement(s).

MM-BIO-5 Pre-Construction Nesting Bird Survey and Avoidance. Construction activities shall avoid the migratory bird nesting season (typically February 1 through August 31) to reduce any potential significant impact to birds that may be nesting on the survey area. If construction activities must occur during the migratory bird nesting season, an avian nesting survey of the project site and within 500 feet of all impact areas must be conducted to determine the presence/absence of protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, and 3513. If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate buffer established around the nest, which will be determined by the biologist based on the species' sensitivity to disturbance (typically 300 feet for passerines and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall also be conducted when construction occurs in close proximity to an active nest buffer. No project activities may encroach into established buffers without the consent of a monitoring biologist. The buffer shall remain in place until it is determined the nestlings have fledged and the nest is no longer considered active.

b) ***Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

No Impact. The development footprint on site does not contain any riparian habitat or vegetation communities considered a sensitive biological resource by CDFW. Therefore, project implementation would have no impact on riparian habitat or any other sensitive vegetation communities.

c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

No Impact. The project site does not contain any potential wetlands, streams, or lakes under the jurisdiction of the state or United States, nor does it support hydrophytic vegetation; therefore, the project would have no impact to state or federally protected waters or wetlands.

d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Less than Significant Impact. The project site currently consists of a hospital campus and an empty lot. The BSA has very limited function as a wildlife corridor due to the urbanized nature of the project vicinity and the project's lack of connectivity to open spaces. Therefore, construction would not disrupt wildlife movement beyond existing conditions. Nearby corridors that could support wildlife movement in the region, such as the Mojave River, are located at least 2 miles east of the project site and would not be impacted by the project. Further, the project site does not contain nursery sites. Therefore, impacts associated with wildlife movement, wildlife corridors, and wildlife nursery sites would be less than significant.

e) ***Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Less than Significant Impact with Mitigation Incorporated. Applicable local ordinances protecting biological resources within the BSA include the City of Victorville General Plan, Victorville Municipal Code, and the locally enforced California Desert Native Plants Act (CDNPA). Compliance with these is discussed below.

City of Victorville General Plan

The City's General Plan Resource Element (City of Victorville 2008b) addresses biological resources in Goal 4, Conservation of Important Habitat, wherein objectives and policies are set forth to achieve the goal of preserving native vegetation that provides habitat for rare, threatened, and/or endangered plant and wildlife species. As described above, the project site currently consists of a hospital campus and empty lot, and impacts to special-status species would be reduced to less than significant with the implementation of MM-BIO-1 through MM-BIO-5.

The project would be consistent with the goals and objectives related to biological resources within the City of Victorville General Plan.

Victorville Municipal Code

The Victorville Municipal Code prohibits removal of or damage to western Joshua trees without prior consent of the director of Parks and Recreation or their designee per Section 13.33.040. The code also requires coordination with any laws and standards enforced by CDFW. As required by MM-BIO-1 (Western Joshua Tree Fee Payment), mitigation for direct and indirect impacts to western Joshua trees will be fulfilled through attainment of a Western Joshua Tree Conservation Act Incidental Take Permit and payment of fees consistent with the Western Joshua Tree Conservation Plan. In addition, MM-BIO-1 requires that the project attain prior written consent from the City's director of Parks and Recreation in accordance with Victorville Municipal Code Chapter 13.33, Preservation and Removal of Joshua Trees. Therefore, the project would not conflict with Victorville Municipal Code.

California Desert Native Plants Act

The purpose of the California Desert Native Plants Act (CDNPA) is to protect certain species of California desert native plants from unlawful harvesting on both public and privately owned lands. The CDNPA only applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego Counties. Within these counties, the CDNPA prohibits the harvest, transport, sale, or possession of specific native desert plants unless a person has a valid permit or wood receipt and the required tags and seals. A total of six western Joshua tree individuals were observed within the BSA. Of those six trees, two western Joshua tree individuals within the project impact area would be directly impacted by project implementation, and two western Joshua trees within the 50-foot buffer would be indirectly impacted. No other plants protected under the CDNPA were found within the BSA. As required by MM-BIO-1 (Western Joshua Tree Fee Payment), mitigation for direct and indirect impacts to four western Joshua trees will be fulfilled through payment of fees consistent with the Western Joshua Tree Conservation Plan.

Implementation of MM-BIO-1 would reduce potential impacts associated with local policies and ordinances to less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than Significant Impact. The project site is not located within any formally adopted Natural Community Conservation Plan/Habitat Conservation Plan (CDFW 2023). The project site is within the Bureau of Land Management's California Desert Conservation Area Plan (BLM 1980), the Draft West Mojave Plan area (BLM 2005) and the Desert Renewable Energy Conservation Plan area (BLM 2016) but is not located within BLM managed lands. Therefore, impacts associated with an adopted habitat conservation plan would be less than significant.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. **CULTURAL RESOURCES** – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

a) ***Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

No Impact. The project was thoroughly analyzed for potential impacts on historical resources in accordance with the CEQA Guidelines, specifically Section 15064.5, as documented in the Cultural Resources Technical Report included as Appendix D. The project site is primarily developed and consists of a hospital campus and an empty lot. The project site has been subject to previous disturbances including grading and dumping.

The California Historical Resources Information System (CHRIS) records search identified 13 previously recorded cultural resources within the 1-mile records search radius. Of these, one is a historic-era built environment resource, and the remaining consist of prehistoric archaeological resources. The built environment resource is CA-SBR-7061H, a segment of Bear Valley Cutoff (Bear Valley Road), which is mapped as intersecting the project site. As determined in Appendix D, P-36-007061/CA-SBR-7061H was determined to not be eligible for listing on the National Register of Historic Places or the California Register of Historical Resources due to its lack of historical and engineering significance. The project is unlikely to materially impair the significance of any historical resources, ensuring compliance with CEQA regulations; therefore, no impact to historical resources would occur.

b) ***Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

Less than Significant Impact with Mitigation Incorporated. The project site is currently mostly developed, consisting of a hospital campus and empty lot. A search of the CHRIS database for the project site search area identified one previously recorded built environment resource and two previously recorded cultural resources. Results of the CHRIS records search indicate that 36 previous cultural resources studies have been conducted within 1 mile of the project site, three of which address the entirety of the project site. Two cultural resources are mapped as being adjacent to the project site, P-36-060842 and P-36-

060844, both consisting of prehistoric isolates. The resources were identified during a pedestrian survey and collected (Alexandrowicz et al. 1993a&b). A pedestrian survey for the project (conducted October 19, 2023) did not identify any surficial evidence of cultural material.

A review of the 2023 geotechnical report prepared for the project (Appendix E to this MND) determined that on-site soils generally consisted of interbedded layers of poorly graded sand, sandy silt, and silty sand with varying amounts of silt extending to the maximum depth of the exploration (approximately 51.5 feet below ground surface). The maximum depth of ground disturbance is 51.5 feet below the existing ground surface. In consideration of the number of known resources within close proximity to the project site and because alluvial soils suited to support the development of archaeological deposits are present within the project site, there is moderate potential for identifying unanticipated buried cultural resources deposits within previously undisturbed areas during subsurface project activities. In the event that unknown archaeological resources are encountered during project implementation, impacts to these resources would be potentially significant.

The project would implement MM-CUL-1 through MM-CUL-3, which would ensure that measurements are in place for the proper treatment of any inadvertently discovered archaeological resources. Potential impacts to archaeological resources and human remains would be reduced to less than significant with mitigation incorporated.

MM-CUL-1 Workers Environmental Awareness Program Training. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of construction activities. A basic presentation shall be prepared and presented by a qualified archaeologist to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the Workers Environmental Awareness Program training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the on-call archaeologist and, if appropriate, tribal representative. Necessity of training attendance shall be stated on all construction plans.

MM-CUL-2 Archaeological Construction Monitoring. In consideration of the general sensitivity of the project site for cultural resources, a qualified archaeologist shall be retained to conduct cultural resources monitoring during initial ground-disturbing activities within previously undisturbed deposits. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits. The archaeologist should be responsible for maintaining monitoring logs. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Following the completion of construction, the qualified archaeologist shall provide an archaeological monitoring report to the lead agency and the South Central Coast Information Center with the results of the cultural monitoring program.

MM-CUL-3 Inadvertent Discovery Treatment and Protocol. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (14 CCR 15064.5[f]; California Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. If the discovery is Native American in nature, drafts of archaeological treatment plan shall be provided to YSMN for review and comment,. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site. The archaeologist shall monitor the remainder of the project construction and implement the Plan accordingly.

Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout project construction.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. The cultural resources intensive pedestrian survey conducted for the project did not identify any human remains or find any indications that they would be expected to be found on the project site. However, although unlikely, there is the possibility of human remains being discovered during ground disturbing activities on the project site. If remains are discovered during project construction activities, mitigation is proposed that would require work in the vicinity of the discovery be halted and procedures set forth in the California Public Resources Code (Section 5097.98) and California Health and Safety Code (Section 7050.5) be followed. Therefore, potential discovery of undocumented human remains on the project site could result in a potentially significant impact and mitigation is required.

MM-CUL-4 would ensure that measures are in place for the proper treatment of any inadvertently discovered human remains and potential impacts to human remains would be reduced to less than significant with mitigation incorporated.

MM-CUL-4 Human Remains: As specified by California Health and Safety Code Section 7050.5, if human remains, or remains that are potentially human, are found on the project site during ground disturbing activities or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Bernadino County Medical Examiner’s Office by telephone. No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the Qualified Archaeologist and/or the traditionally culturally affiliated Native American monitor) shall occur until the medical examiner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The electricity and natural gas used for construction of the project would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time.

The proposed project's impact on energy resources is discussed separately below for construction and operation. Dudek estimated energy consumption (electricity, natural gas, and petroleum consumption) using CalEEMod data from the air quality and GHG assessment, which in turn was based on assumptions developed in consultation with the project design engineers. For further detail on the assumptions and results of the energy analysis, please refer to Appendix A.

Short-Term Construction

CalEEMod Version 2020.1.1.28 was used to estimate potential project-generated GHG emissions during construction, which were then used to estimate energy consumption. Construction of the project would result in GHG emissions primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 3.3, Air Quality, and Appendix A of this Draft MND are also applicable for the estimation of construction-related GHG emissions. The estimated GHGs were back-calculated based on carbon content (i.e., kilograms of carbon dioxide [CO_2] per gallon) in order to estimate fuel usage during project construction. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2021). Energy use calculations for construction are provided in Appendix A.

Electricity

Temporary electric power for as-necessary lighting and electronic equipment such as computers inside temporary construction trailers would be provided by Southern California Edison (SCE). The electricity used for such activities would be temporary, would be substantially less than that required for project operation, and would have a negligible contribution to the project's overall energy consumption.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the "petroleum" subsection. Any minor amounts of natural gas that may be consumed as a result of project construction would be substantially less than that required for project operation and would have a negligible contribution to the project's overall energy consumption.

Petroleum

Heavy-duty construction equipment associated with demolition and construction activities for construction would rely on diesel fuel, as would haul trucks involved in removing the materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel to and from the site in gasoline-powered passenger vehicles.

Heavy-duty construction equipment of various types would be used during each phase of project construction. Appendix E lists the assumed equipment usage for each phase of construction.

Fuel consumption from construction equipment was estimated by converting the total CO_2 emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in the years 2025–2028 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2021). The estimated diesel fuel usage from construction equipment, haul trucks, and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in Table 3.6-1.

Table 3.6-1. Total Project Construction Petroleum Demand

Off-Road Equipment (diesel)	Haul Trucks (diesel)	Vendor Trucks (diesel)	Worker Vehicles (gasoline)
Gallons			
71,312	8,733	11,457	11,780

Source: See Appendix A for outputs.

In summary, construction associated with the potential future development facilitated by the project is conservatively anticipated to consume 11,780 gallons of gasoline from worker vehicles and 71,312 gallons of diesel from off-road equipment, haul trucks, and vendor trucks. In San Bernardino County in 2024, it is estimated that approximately 1.1 billion gallons of petroleum will be consumed by on-road vehicles, and approximately 6.7 million gallons of petroleum will be consumed by off-road equipment (CARB 2021).

The project would be subject to CARB's In-Use Off-Road Diesel Vehicle Regulation that applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation (1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; (2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; (3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and (4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (i.e., exhaust retrofits). The fleet must either show that its fleet average index was less than or equal to the calculated fleet average target rate or that the fleet has met the Best Achievable Control Technology requirements. Overall, the project would not be unusual when compared to overall local and regional demand for energy resources and would not involve characteristics that require equipment that would be less energy-efficient than at comparable construction sites in the region or state.

Additionally, any future development facilitated by the project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Title 24 standards. Considering these requirements, the project would not result in the inefficient, wasteful, or unnecessary consumption of construction energy. Therefore, short-term construction energy impacts would be less than significant.

Long-Term Operational Impacts

During project operations, activities that would consume energy would include electricity and natural gas use for building operations, electricity for water and wastewater conveyance, and petroleum consumption from employees, customers, and delivery vehicle trips. Additional assumptions for these sources are described below, and energy use calculations for operations are provided in Appendix A.

Electricity

The operation of the project buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Electricity consumption associated with project operation is based on the CalEEMod outputs presented in Appendix A.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous "plug-in" uses).

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2022 standards, became effective on January 1, 2023. According to these estimations, the project would consume approximately 2,516,429 kilowatt-hours (kWh) per year during operation (Appendix A). The project would consume approximately 66,971 kWh per year from water and wastewater sources, resulting in a total use of 2,583,400 kWh per year. The non-residential electricity demand in 2022 was 10,327,755,820 kWh (10,328 gigawatt-hours) for San Bernardino County (CEC 2020). As such, the project would have a negligible impact on demand for San Bernardino County and SCE.

Natural Gas

The operation would require natural gas for various purposes, including water heating and natural gas appliances and forklifts. Natural gas consumption associated with operation is based on the CalEEMod outputs in Appendix A.

CalEEMod default values for energy consumption for each land use were applied for the project analysis. According to these estimations, the project would consume approximately 5,057,395 kilo-British thermal units per year. The non-residential natural gas consumption in 2022 was 294,792,317,000 kilo-British thermal units for San Bernardino County (CEC 2020).

Petroleum

During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, landscaping equipment, and emergency generator testing.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the VMT as a result of project operation. As shown in Appendix A and as discussed in Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, the annual net new VMT attributable to the project is expected to be 2,750,830 VMT. Similar to the construction worker and vendor trips, fuel consumption from worker and truck trips is estimated by converting the total CO_2 emissions from operation of the project to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Mobile source emissions were estimated using the CalEEMod. Calculations for annual mobile source fuel consumption are provided in Table 3.6-2.

Table 3.6-2. Annual Mobile Source Petroleum Demand

Fuel	Vehicle MT CO_2	kg/CO_2/Gallon	Gallons
Gasoline	907.01	8.78	103,443.17
Diesel	49.87	10.21	4,884.47
		Total	**108,327.64**

Sources: Trips and vehicle CO_2 (Appendix A; kg/CO_2/Gallon (The Climate Registry 2021).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

By comparison, California as a whole consumes approximately 25.3 billion gallons of petroleum per year (EIA 2024). Countywide total petroleum use by vehicles is expected to be 1.1 billion gallons per year by 2028 (CARB 2021).

Summary

Statewide emission reduction measures proposed in the CARB-adopted amendments to the Pavley regulations include measures aimed at reducing GHG emissions associated with transportation. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and by about 30% in 2016, all while improving fuel efficiency and reducing motorists' costs. As such, vehicle trips associated with the project are expected to use less petroleum due to advances in fuel economy over time.

CARB has adopted a new approach to passenger vehicles—cars and light trucks—by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California (CARB 2017).

The project would create additional electricity and natural gas demand by adding recreational and commercial facilities. New facilities associated with the project would be subject to the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of nonresidential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

In summary, although the project would see a moderate increase in petroleum use during construction and operation, energy used for these purposes would be nominal and decrease over the project's lifespan, as vehicles and equipment become increasingly efficient as technological advances increase vehicle fuel economy and compliance with statewide GHG reduction standards reduces overall use of energy resources. Therefore, impacts to energy resources during operation would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The project would be subject to and would comply with, at a minimum, the 2022 California Building Code, Title 24 (24 CCR Part 6). The project would not conflict with existing energy standards and regulations. The electricity and natural gas used for construction of the project would be temporary, would be substantially less than that required for project operations, and would have a negligible contribution to the project's overall energy consumption.

Construction

Construction is anticipated to consume 11,780 gallons of gasoline and 91,502 gallons of diesel. This would be a fraction of petroleum that would be consumed in California and countywide over the course of the construction period. Therefore, construction would have a less-than-significant impact with regards to regional energy supplies.

Operation

As discussed under the previous thresholds, the project would result in an increased demand for electricity, natural gas, and petroleum. The project would comply with the measures included in the 2022 California Building Code, Title 24 standards. The efficiency standards apply to new construction of both residential and nonresidential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. Therefore, the project would not conflict with any state or local plans implementing energy efficiency standards.

In addition, Pavley regulations reduced GHG emissions from California passenger vehicles by about 22% in 2012 and by about 30% in 2016, while improving fuel efficiency. By 2025, when the Advanced Clean Cars rules are fully implemented, one in seven new cars sold in California (1.4 million) will be non-polluting or nearly so, including plug-in hybrids, fully electric battery-powered cars, and hydrogen-powered fuel cell vehicles (CARB 2012). Meanwhile, gasoline- and diesel-powered passenger vehicles would grow ever cleaner and more efficient. A variety of new technologies, from direct fuel injection to lower rolling resistance tires, will also cut pollution and create more energy-efficient vehicles (CARB 2012). As such, petroleum usage associated with operation of the project is anticipated to decrease over time due to a reduction in VMT in the region and advances in fuel economy. Therefore, impacts related to regional energy supplies and capacity during project operation would be less than significant.

3.7 Geology and Soils

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

A Geotechnical Engineering Report was prepared by Terracon in June 2024 for the proposed project and is included as Appendix E. The following discussion is based on the analysis within Appendix E.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The project site currently consists of a medical campus and empty lot. The project proposes the construction of a new ED and a Med Surg Unit. The project site is not located within an Alquist-Priolo Fault Zone. The closest fault zone to the project site is the San Jacinto North Frontal Zone approximately 6.8 miles southeast of the site. The project site is not located within an earthquake fault zone and is not located in proximity to a fault zone. Impacts related to risks from rupture of a known earthquake fault as part of project implementation would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. As stated above, the project site is not located in or in proximity to a fault zone. Additionally, the design of the project would conform to all applicable federal, state, and local building codes, which would ensure structural integrity. Impacts related to risks from strong seismic ground shaking as part of project implementation would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

No Impact. As described in Appendix E, the project site is not within an area identified as having liquefaction potential and historic groundwater levels are not within 50 feet of the ground surface. No impact related to risks from seismic-related ground failure, including liquefaction, as part of project implementation would occur.

iv) Landslides?

No Impact. The project site is relatively flat and is not located at the base of any hillsides, ridgeline, or slopes. Additionally, the project site has not been mapped as a landslide hazards area. No impact would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The project site consists of a previously developed medical campus and an undeveloped lot. Potential erosion and sedimentation impacts would be temporarily increased during proposed construction, through activities such as grading and removal of surface stabilizing features. Most of the subject site would be covered with structures or flatwork. Erosion by wind and water is not considered to be a hazard at the site. The short-term erosion and sedimentation impacts would be addressed through conformance with the National Pollutant Discharge Elimination System standards. Additionally, the project would be required to draft and implement an approved stormwater pollution prevention plan and BMPs, including appropriate measures to address erosion and sedimentation during construction. Implementation of the BMPs required pursuant to these permitting processes would ensure that erosion and sedimentation is managed to achieve regulatory water discharge standards. Once the project is in operation, the project site would be developed and would not result in the substantial erosion of topsoil. Impacts would be less than significant.

c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Less than Significant Impact. As stated above, the project site is relatively flat; is not located at the base of any hillsides, ridgeline, or slopes; and is not located in any known fault zones. Lateral spreading is unlikely to occur at the project site because the project site is relatively flat and is not located near water. Human or natural activities have the potential to cause subsidence; however, the site is not located in an area identified as having a potential for landslide or lateral spreading. Additionally, the design of the project would conform to all applicable federal, state, and local building codes, which would ensure structural integrity regardless of the characteristic of the underlying soils. Therefore, impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

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

Less than Significant Impact. The subsoil conditions of the project site include interbedded layers of poorly graded sand, sandy silt, and silty sand with varying amounts of silt extending to the maximum depth of the explorations, approximately 51.5 feet below ground surface. Soils on the project site are considered to have very low expansion potential. The project site is not underlain by expansive soils, and therefore impacts relating to risks to life or property from expansive soils would be less than significant.

e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

No Impact. The project would connect to existing wastewater infrastructure provided by the City. The project would not include the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

f) ***Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Less than Significant Impact with Mitigation Incorporated. As identified in the City of Victorville General Plan Environmental Impact Report, a sensitivity assessment was conducted throughout the City to determine potential impacts to paleontological resources, and the project site is within the area considered to have a low sensitivity regarding paleontological resources. The project site is in an area consisting of Victorville Fan sediments, which generally have a low potential for containing any significant nonrenewable paleontological resources, but, if appropriate lithologies are present, fossils may be preserved within these sediments (City of Victorville 2008a).

While there are no known paleontological resources on the project site, due to the required grading and drilling for the project, the geologic units on site that have the potential to contain paleontological resources at depth, and the moderate potential for the discovery of paleontological resources, **MM-GEO-1** is provided in the event excavation results in the unanticipated discovery of paleontological resources. Impacts would be reduced to less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) 2010 guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the SVP 2010 guidelines and shall outline requirements for pre-construction meeting attendance and worker environmental awareness training; requirements for monitoring within the project site at depths below 15 feet below the ground surface based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the pre-construction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering). In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources, which, if determined to be significant, will be curated into an accredited fossil repository, such as the Natural History Museum of Los Angeles County, at the project proponent's expense. Upon completion of project excavations requiring paleontological monitoring, the qualified paleontologist shall submit a final paleontological monitoring report to the project proponent and fossil repository (if fossils are discovered). The report shall detail the monitoring program's results, analyses, and conclusions.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. GHGs are those that that absorb infrared radiation (i.e., trap heat) in the Earth's atmosphere. The trapping and buildup of heat in the atmosphere near the Earth's surface (the troposphere) is referred to as the "greenhouse effect" and is a natural process that contributes to the regulation of the Earth's temperature, creating a livable environment on Earth. The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. Human activities that generate and emit GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. This rise in temperature has led to large-scale changes to the Earth's system (e.g., temperature, precipitation, wind patterns), which are collectively referred to as climate change. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride (see also CEQA Guidelines Section 15364.5). The primary GHGs that would be emitted by project-related construction and operations include CO_2, CH_4, and N_2O.[4]

The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare each GHG's ability to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

4 Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride are generally associated with industrial activities, including the manufacturing of electrical components and heavy-duty air conditioning units and the insulation of electrical transmission equipment (substations, power lines, and switch gears). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride in measurable quantities.

Consistent with CalEEMod Version 2020.4.0, this GHG emissions analysis assumed the GWP for CH_4 is 25 (i.e., emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2) and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change's Fourth Assessment Report (IPCC 2007).

The City of Victorville adopted a Climate Action Plan (CAP) in 2016 to demonstrate how the City would reduce GHG emissions in compliance with Assembly Bill (AB) 32. The CAP includes measures to reduce the City's GHG emissions to 29% below 2020 levels at business-as-usual growth and development. The CAP involves both existing and new construction within the City and across all industries including residential, commercial, industrial, municipal, and institutional. The CAP also provides a GHG Emissions Screening Table for projects to assess consistency (City of Victorville 2015).

Given that the City's CAP does not address GHG emissions reductions consistent with the current state legislation (i.e., Senate Bill [SB] 32 and AB 1279), it is not qualified for CEQA analysis (see CEQA Guidelines Section 15183.5[b]) and cannot be relied upon for determination of project-related GHG emissions impact significance (i.e., tiering).

The City has not adopted a numeric significance threshold for determining significant impacts associated with GHG emissions. Air districts typically act in an advisory capacity to local governments in establishing the framework for environmental review of air pollution impacts under CEQA. This may include recommendations regarding significance thresholds, analytical tools to estimate emissions and assess impacts, and mitigations for potentially significant impacts. Although air districts will also address some of these issues on a project-specific basis as responsible agencies, they may provide general guidance to local governments on these issues (SCAQMD 2008). While the project is located within the jurisdiction of the MDAQMD, both MDAQMD and the SCAQMD recommended thresholds are discussed below. Because SCAQMD's thresholds are more stringent and are supported by substantial evidence from an expert agency, the SCAQMD's recommended thresholds are utilized for determining the potential significance of impacts for the project, as discussed below.

On May 13, 2010, EPA finalized the GHG Tailoring Rule (75 FR 31514). The Tailoring Rule sets major source emissions thresholds that define when federal operating permits under Prevention of Significant Deterioration or Title V are required. The Tailoring Rule was intended to focus Prevention of Significant Deterioration and Title V permits to the largest emitters of GHGs and avoid overwhelming permitting authorities. The Tailoring Rule establishes a threshold of 100,000 tons per year or 90,719 MT per year of GHGs from new sources, above which, sources are considered major sources requiring a federal operating permit. As such, the MDAQMD has adopted a significance threshold for GHGs of 100,000 tons per year. More specifically, 100,000 tons per year of GHG emissions from a single facility constitutes a major source that requires a federal operating permit. Similarly, the MDAQMD's oxides of nitrogen significance threshold of 25 tons per year is equal to the major source threshold applicable to areas designated severe non-attainment for ozone. As such, use of EPA's determination of whether a project is a major source and consequently establishing a threshold based on that is supported by substantial evidence. However, as noted above, MDAQMD's threshold is more applicable for stationary source projects that require federal permits.

In light of the lack of established GHG emissions thresholds that would apply to the project, CEQA allows lead agencies to identify thresholds of significance applicable to a project that are supported by substantial evidence. Substantial evidence is defined in the CEQA statute to mean "facts, reasonable assumptions predicated on facts, and expert opinion supported by facts" (14 CCR 15384[b]).[5] Substantial evidence can be in the form of technical studies, agency staff reports or opinions, expert opinions supported by facts, and prior CEQA assessments and planning documents. Therefore, to establish additional context in which to consider the order of magnitude of the project's GHG emissions, this analysis accounts for the following considerations by other government agencies and associations about what levels of GHG emissions constitute a cumulatively considerable incremental contribution to climate change:

- The Sacramento Metropolitan Air Quality Management District has established thresholds, including 1,100 MT CO_2e per year for the construction or operational phase of land use development projects or 10,000 direct MT CO_2e per year from stationary source projects (SMAQMD 2018).
- The Placer County Air Pollution Control District recommends a tiered approach to determine if a project's GHG emissions would result in a significant impact. First, project GHG emissions are compared to the de minimis level of 1,100 MT CO_2e per year. If a project does not exceed this threshold, it does not have significant GHG emissions. If the project exceeds the de minimis level and does not exceed the 10,000 MT CO_2e per year bright line threshold, then the project's GHG emissions can be compared to the efficiency thresholds. These thresholds are 4.5 MT CO_2e per-capita for residential projects in an urban area and 5.5 MT CO_2e per-capita for residential projects in a rural area. For nonresidential development, the thresholds are 26.5 MT CO_2e per 1,000 square feet for projects in urban areas and 27.3 MT CO_2e per 1,000 square feet for projects in rural areas. The Placer County Air Pollution Control District bright-line GHG threshold of 10,000 MT CO_2e per year is also applied to land use projects' construction phase and stationary source projects' construction and operational phases. Generally, GHG emissions from a project that exceed 10,000 MT CO_2e per year would be deemed to have a cumulatively considerable contribution to global climate change (PCAPCD 2017).
- The Bay Area Air Quality Management District has adopted 1,100 MT CO_2e per year as a project-level bright-line GHG significance threshold that would apply to operational emissions from mixed land-use development projects, a threshold of 10,000 MT CO_2e per year as the significance threshold for operational GHG emissions from stationary-source projects, and an efficiency threshold of 4.6 MT CO_2e per service population per year (BAAQMD 2017).
- The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. In December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD 2008).

Since the project includes stationary sources (i.e., diesel generators used for emergency power and boilers), the project's GHG emissions were compared to the 10,000 MT CO2e per year quantitative threshold, which, as described above, is used by Sacramento Metropolitan Air Quality Management District, Placer County Air Pollution Control District, Bay Area Air Quality Management District, and SCAQMD for industrial and/or

[5] 14 CCR 15384 provides the following discussion: "Substantial evidence" as used in the Guidelines is the same as the standard of review used by courts in reviewing agency decisions. Some cases suggest that a higher standard, the so called "fair argument standard" applies when a court is reviewing an agency's decision whether or not to prepare an EIR. Public Resources Code section 21082.2 was amended in 1993 (Chapter 1131) to provide that substantial evidence shall include "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The statute further provides that "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence."

stationary source emissions of GHGs. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 MT CO2e per year threshold in numerous CEQA documents where those air districts are the lead agency. While the City has not adopted a numeric significance threshold, the 10,000 MT CO2e per year threshold has been applied herein to evaluate the potential for the project to resut in a significant GHG emissions impact under CEQA because it is more stringent than the MDAQMD threshold and the SCAQMD is also an expert agency in the Southern California region.

Short-Term Construction Emissions

CalEEMod Version 2022.1.1.28 was used to estimate potential project-generated GHG emissions during construction. Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. All details for construction criteria air pollutants discussed in Section 3.3, Air Quality, are also applicable for the estimation of construction-related GHG emissions. As such, see Section 3.3 for a discussion of construction emissions calculation methodology and assumptions used in the GHG emissions analysis.

MDAQMD follows the SCAQMD recommendation in calculating the total GHG emissions for construction activities by amortizing the emissions over the life of a project. This is done by dividing construction-period GHG emissions by a 30-year project life, then adding that number to the annual operational phase GHG emissions. As such, project construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. Construction of the project was assumed in CalEEMod to last approximately 31 months. Table 3.8-1 presents amortized construction emissions for the project from on-site and off-site emission sources.

Table 3.8-1. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
2025	295	0.01	0.02	0.14	301
2026	378	0.01	0.01	0.13	382
2027	363	0.01	0.01	0.11	366
2028	1.99	<0.005	<0.005	<0.005	2
				Total	1,051
				Amortized emissions over 30 years	35.03

Notes: GHG = greenhouse gas; CO2 = carbon dioxide; CH4 = methane; N2O = nitrous oxide; CO2e = carbon dioxide equivalent.
See Appendix A for complete results.

As shown in Table 3.8-1, the estimated total GHG emissions during construction would be approximately 1,051 MT CO_2e over the assumed construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 35 MT CO_2e per year. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

Long-Term Operational Emissions

Emissions from the operational phase of the project were estimated using CalEEMod Version 2022.1.1.28. An operational year of 2028 was assumed consistent with completion of project construction. Potential project-generated operational GHG emissions were estimated for area sources (landscape maintenance), energy sources (diesel, natural gas, and electricity), mobile sources, solid waste, water supply and wastewater treatment, and other sources of emissions (cooling systems and chillers). Emissions from each category are discussed in the following text with respect to the project. For additional details, see Section 3.3 for a discussion of operational emission calculation methodology and assumptions, specifically for area, energy (natural gas), and mobile sources.

Area Sources

CalEEMod was used to estimate GHG emissions from the project's area sources, which include operation of gasoline-powered landscape maintenance equipment, which produce minimal GHG emissions. See Section 3.3 for a discussion of landscaping equipment emissions calculations. Consumer product use and architectural coatings result in volatile organic compound emissions, which are analyzed in air quality analysis only, and little to no GHG emissions.

Energy

The estimation of operational energy emissions was based on CalEEMod land use defaults and units or total area (i.e., square footage) of the project's land uses. The energy use (electricity or natural gas usage per square foot per year) from nonresidential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Emissions are calculated by multiplying the energy use by the utility carbon intensity (pounds of GHGs per kilowatt-hour for electricity or 1,000 British thermal units for natural gas) for CO_2 and other GHGs. Annual natural gas and electricity emissions were estimated in CalEEMod using the emissions factors for SCE, which would be the energy provider for the project site.

The current version of CalEEMod assumes compliance with the 2019 Title 24 Building Energy Efficiency Standards (CAPCOA 2022); however, the project would be required to comply with the 2022 Title 24 Standards at a minimum.

CalEEMod default energy intensity factors (CO_2, CH_4, and N_2O mass emissions per kilowatt-hour) for SCE are based on the values for SCE's energy mix in 2021. SB X1 2 established a target of 33% of energy from renewable energy sources for all electricity providers in California by 2020, and SB 100 calls for further development of renewable energy, with a target of 44% by 2024, 52% by 2027, and 60% by 2030.

Mobile Sources

All details for criteria air pollutants discussed in Section 3.3 are also applicable for the estimation of operational mobile source GHG emissions. In summary, emissions associated with passenger vehicles and heavy-duty trucks traveling to and from the project site were estimated for the project using the CARB EMFAC2021 vehicle emissions factors within CalEEMod (CARB 2021).

Regulatory measures related to mobile sources include AB 1493 and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and EPA have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the project's motor vehicles. The effectiveness of fuel economy improvements was evaluated by using the EMFAC2021 emission factors in CalEEMod to the extent it was captured for motor vehicles in 2026 and 2030 for the project.

Solid Waste

The project would generate solid waste and therefore result in CO_2e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste for the project.

Stationary Sources

The project would include several on-site stationary sources of emissions, including natural gas-powered hot water boilers, natural gas-powered domestic water heaters, a diesel-fueled emergency generator, and a cooling system consisting of electric chillers and cooling fans. Emissions from the emergency generator were calculated in CalEEMod.

Parameters on the fuel consumption of the other stationary sources were obtained from the project applicant, and annual energy consumption in kilowatt-hours (for electric sources) or Million British thermal units (MMBtu) (for natural gas sources) was calculated in an Excel-based model. These estimates were then multiplied by the default CalEEMod GHG intensity factors to obtain the GHG emissions from each remaining stationary source not calculated in CalEEMod.

Water and Wastewater Treatment

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the project would require the use of electricity for conveyance and treatment, and GHG emissions would be generated during wastewater treatment. The indoor and outdoor water use and electricity consumption from water use and wastewater generation were estimated using CalEEMod default values for the project.

Operation of the project would generate GHG emissions through motor vehicle trips; landscape maintenance equipment operation (area source); energy use (natural gas and electricity); solid waste disposal; water supply, treatment, and distribution and wastewater treatment; and other sources of emissions (off-road equipment). CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section 3.3. The estimated operational project-generated GHG emissions are shown in Table 3.8-2.

Table 3.8-2. Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Area	1.22	<0.005	<0.005	0.00	1.22
Energy	664	0.06	0.01	0.00	667

Table 3.8-2. Estimated Annual Operational GHG Emissions

Emission Source	CO_2	CH_4	N_2O	R	CO_2e
	Metric Tons per Year				
Mobile	957	0.04	0.05	1.26	973
Solid waste	80.3	8.03	0.00	0.02	281
Stationary	1,063.7	0.06	0.02	0.00	1,066.8
Water and Wastewater	13.8	0.34	0.01	0.00	24.8
				Total	**3,013.8**
				Amortized construction emissions	*35.03*
				Total operational + amortized construction GHGs	**3,048.84**

Notes: GHG = greenhouse gas; CO2 = carbon dioxide; CH4 = methane; N2O = nitrous oxide; CO2e = carbon dioxide equivalent.
See Appendix A for complete results.
Totals may not sum due to rounding.

As shown in Table 3.8-2, estimated annual project-generated GHG emissions would be approximately 3,014 MT CO_2e per year as a result of project operations only. After accounting for amortized project construction emissions, total GHGs generated by the project would be approximately 3,049 MT CO_2e per year. As such, annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD industrial project threshold of 10,000 MT CO_2e per year. Impacts would be less than significant.

b) ***Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

Less than Significant Impact. Applicable plans, policies, and regulations for the proposed project include the Southern California Association of Governments' (SCAG's) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and CARB's Scoping Plan. Each of these plans is described below along with an analysis of the proposed project's potential to conflict with the related GHG emission reduction goals. As discussed above, the City's CAP does not align with statewide goals beyond AB 32 (i.e., 2020 GHG reduction target); it is therefore not considered a qualified plan for CEQA analysis per CEQA Guidelines Section 15183.5 for projects after 2020. Given that the project would be constructed and operational after 2020, the project cannot tier from the CAP for determining significance of project-related GHG impacts. However, a discussion of the CAP and the project's support of its overall GHG reduction goals is provided below for informational purposes.

Potential to Conflict with the City's Climate Action Plan

As previously stated, the 2015 CAP was developed to demonstrated how the City would reduce GHG emissions in compliance with AB 32 (i.e., 1990 emissions by 2020). While no inventory or reduction targets were estimated for the post-2020 period, the CAP did include a discussion of likely strategies the City would implement to keep on track into the future. These included strategies to address GHG emissions from building energy, transportation, waste generation, water use, and energy use. These strategies are discussed below together with a discussion of the project's potential to conflict.

- **Increase energy efficiency and green building efforts.** The project would not conflict with the City's goal to increase energy efficiency and green building efforts. The project would comply with current

Title 24 building standards, and it includes several sustainable design features related to energy efficiency and drainage. The glazing system of the building addition is designed to maximize energy efficiency, incorporating a combination of storefront-type windows and fixed windows, all equipped with low-E insulated glass, which minimizes energy consumption. Additionally, the roofing system of the project would have a reflective white surface to mitigate heat absorption and would include tapered rigid foam sheets adhered to the flat concrete roof slab, providing insulation and enabling efficient water drainage.

- **Continue to implement land use and transportation measures.** The project would not conflict with the City's goal to reduce emissions from transportation, as it is an expansion of an existing hospital facility. The project does not proposal substantial additional vehicle trips or new growth that would conflict with an existing policy or plan.
- **Move beyond local waste diversion goal for 2020.** The project would not conflict with the solid waste reduction goals of the City beyond those proposed for 2020. The project would be in compliance with current state and local regulations relevant to the City's goal.
- **Continue to improve local water efficiency and conservation.** The project would not conflict with improvements to water efficiency and conservation within the City to reduce GHG emissions. All landscaping for the proposed facility would be consistent with Section 16-3.10.020(e) of the Victorville Municipal Code development standards for commercial districts and Water Conservation Ordinance 2114, which requires the use of native and low water plants for the development of the landscaping palette.
- **Commercial energy efficiency and renewable energy installations.** The project would support the City's goal for energy efficiency and renewable energy installations. As discussed above, the project includes design features that incorporate passive heating and cooling, minimize heat absorption, and reduce energy consumption.

Potential to Conflict with SCAG's 2024–2050 RTP/SCS

Typically, a project would not conflict with the RTP/SCS if the project does not exceed the underlying growth assumptions within the RTP/SCS. The project would be within the overall growth projections assumed in the Connect SoCal 2024–2050 RTP/SCS.

As stated in the Connect SoCal 2024–2050 RTP/SCS, there is no obligation by a jurisdiction to change its land use policies, General Plan, or regulations to be consistent with the RTP/SCS, and lead agencies have the sole discretion in determining a local project's potential to conflict with the RTP/SCS (SCAG 2024). Because the project would support SCAG's goals and strategies for growth in the region as described below, and because the project would not result in new development of housing, there would be no impact related to the population growth assumed in Connect SoCal.

The project would not conflict with any of the four primary goals outlined in the 2024 RTP/SCS. The first, to "build and maintain an integrated multimodal transportation network," would not be impacted by project activities as the project would not preclude SCAG from meeting this goal. The project would promote sustainability in land use design by developing an existing hospital site in an area proximate to existing land uses, improving access to healthcare services in the region without the development of an additional hospital facility. The project would not conflict with SCAG's goal to "develop, connect and sustain livable and thriving communities," as it would expand existing healthcare uses on site and facilitate the expansion of such uses throughout the existing hospital campus, reducing travel distances and supporting a human-centered community. The project would meet the applicable requirements of the Title 24 Building Energy Efficiency Standards and California Green Building Standards Code or applicable version at the time of building permit issuance, and thus it would not conflict with SCAG's goal of "creating a healthy region for the people of today and tomorrow." Finally, the project would support SCAG's economic goal to "support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region" by providing up to 150 jobs in the region, supporting the regional economic environment. Therefore the project would not conflict with any of the goals within SCAG's Connect SoCal.

Potential to Conflict with the California Air Resources Board's Scoping Plan

As defined by AB 32, CARB is required to develop the Scoping Plan, which provides the framework for actions to achieve the state's GHG emission targets. The Scoping Plan is required to be updated every 5 years and requires CARB and other state agencies to adopt regulations and initiatives that will reduce GHG emissions statewide. The first Scoping Plan was adopted in 2008, and it was updated in 2014, 2017, and most recently in 2022. Although the Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations,6 it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. Therefore, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

Under the Scoping Plan, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

The most recent CARB 2022 Scoping Plan update outlines the state's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target (CARB 2022). As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates are the most applicable to the proposed project.

Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project-level, including GHG emission reductions through increased energy efficiency and renewable energy production (SB 350), reduction in carbon intensity of transportation fuels (Low Carbon Fuel Standard), and the accelerated efficiency and electrification of the statewide vehicle fleet (Mobile Source Strategy). Given that the proposed project is also not anticipated to result in a substantial increase in mobile trips (see Section 3.17, Transportation), the project would also not conflict with the 2022 update's goal of reducing GHG emissions through reductions in VMT statewide.

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6 The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "the Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

Overall, the proposed project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent applicable and required by law. As mentioned above, several Scoping Plan measures would result in reductions of project-related GHG emissions with no action required at the project-level, including those related to energy efficiency, reduced fossil fuel use, and renewable energy production. As demonstrated above, the proposed project would not conflict with CARB's 2017 or 2022 Scoping Plan updates or with the state's ability to achieve the 2030 and 2045 GHG reduction and carbon neutrality goals.

Based on the preceding considerations, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

3.9 Hazards and Hazardous Materials

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

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. Hazardous materials that may be used during construction and demolition activities of the proposed project include gasoline, diesel fuel, oil, lubricants, grease, welding gases (e.g., acetylene, oxygen, and argon), solvents, and paints. These materials would be used and stored in designated construction staging areas within the boundaries of the project site and would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations. The use of these materials for their intended purpose would not pose a significant risk to the public or environment. Hazardous wastes accumulated during project construction may include unused or off-specification paint and primer, paint thinner, solvents, and vehicle- and equipment-maintenance-related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. Hazardous waste that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The use of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

During construction, if hazardous materials and/or petroleum products are stored on the project site above applicable regulatory thresholds, the applicable documents and plans would be submitted accordingly. These thresholds include those outlined in the Hazardous Material Business Plan rules (California Health and Safety Code, Division 20, Chapter 6.95, Article 1; 19 CCR, Division 2, Chapter 4) and Spill Prevention, Control, and Countermeasure Plan rules (40 CFR, Chapter 1, Subchapter D, Part 112). Appropriate plans would be prepared as required by regulation and submitted to the San Bernardino County Fire Protection District's Hazardous Materials Section, the Certified Unified Program Agency, and kept on site through construction of the project (Spill Prevention, Control, and Countermeasure Plans are not submitted to a regulatory agency). BMPs and spill prevention and response procedures required by these rules would be implemented.

Regarding operations, the hospital has permitted storage and use of hazardous materials on site associated with hospital operations. Operation of the project would not significantly increase or change existing operations that include the use of hazardous materials. The ED expansion would not significantly increase the use of existing hazardous materials, such as antibacterial products and compressed gasses. Any additional hazardous materials would be added to existing permits and plans, in accordance with state and local rules and regulations (California Health and Safety Code, Sections 25404–25404.9 and Sections 25500–25520).

Impacts associated with the release the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. As discussed in Section 3.9(a), hazardous materials handled during construction and operation in reportable quantities would be reported, permitted, and handled in accordance with applicable local and state laws and regulations. These permits and associated material handling, control, and spill countermeasure plans are designed to prevent releases of hazardous materials and include instructions on how to immediately respond to and contain a hazardous material release, should it occur. Hazardous materials required for construction and operation would not be handled on site in such quantities that a reasonably foreseeable upset or accident condition would likely occur. Therefore, the potential for the project to result in a significant hazard to the public or the environment would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no existing or proposed schools located within 0.25 miles of the project site. The nearest school is Lomitas Elementary School, which is approximately 0.46 miles away. As such, the project would not emit hazardous emissions or handle hazardous materials near a school, and no impact would occur.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop a Cortese List that is updated at least annually. While the California Environmental Protection Agency no longer maintains a single Cortese List, the agency uses the following databases and lists to meet the requirements of Government Code Section 65962.5.

1. List of hazardous waste and substances sites from Department of Toxic Substances Control EnviroStor database
2. List of leaking underground storage tank sites from the State Water Board's GeoTracker database
3. List of solid waste disposal sites identified by the State Water Resources Control Board or Regional Water Quality Control Boards with waste constituents above hazardous waste levels outside the waste management unit
4. List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the State Water Resources Control Board
5. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the California Health and Safety Code, identified by Department of Toxic Substances Control

A search of the above-listed online databases was conducted to identify Cortese List sites on or adjoining the project site or those that could potentially impact the project site based on level of contamination, proximity to the project site, and other environmental conditions. The project site was not identified in any of the Cortese List databases. Impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project site is not located within 2 miles of a public use airport, nor is it located within an airport land use planning area. The Hesperia Airport is located approximately 6.4 miles south of the project site. The project site is not located within the airport influence areas, including conical surfaces and noise contours (San Bernadino County ALUC 1991). No impact would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City does not currently have an adopted emergency response or evacuation plan. As identified in the General Plan Safety Element, risk of wildfire is low given the geographic location of the City (City of Victorville 2022). The project would include the construction of an ED and a new

Med Surg Unit. The hospital would remain open during project construction, and construction would not be expected to substantially change the overall capacity of the ED in the case of an emergency. Once the project is operational, the ED would increase the hospital's capacity to service the City during an emergency. The project would not result in the closure of any roads that could impair evacuation. Additionally, the project would comply with all applicable policies that are identified in the City's General Plan Safety Element. The project would be consistent with all Safety Element policies, and therefore, impacts to an adopted emergency response or emergency evacuation plan would be less than significant.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less than Significant Impact. The project site is situated in a heavily urbanized area with a low wildfire risk. The proposed development includes the construction of a building addition to the hospital campus and both on-site and off-site improvements. Given the project's location in a highly developed area with minimal fire risk, the project would not expose people or structures to wildfire risk. Therefore, the impact would be ***less than significant.***

3.10 Hydrology and Water Quality

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

The following analysis is based on the Hydrology Report prepared for the proposed project by IMEG Corp and included as Appendix F.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. The project site is currently mostly developed, consisting of a hospital campus and empty lot. The project would include a building addition and associated on- and off-site improvements. Sources of polluted runoff could include heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, pesticides, sediments, and nutrients. The proposed grading and construction associated with the project could create additional sources of pollution, which could potentially cause short-term impacts to water quality. Impacts related to pollution from sedimentation would occur when soil would be exposed during project grading and construction. Once construction is complete, runoff would be conveyed to the City's storm drainage system.

Project construction activities would be subject to Regional Water Quality Control Board requirements related to erosion control, sedimentation, and runoff prevention. Implementation of site-specific BMPs would ensure that the project achieves water quality standards. Therefore, impacts would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The proposed project would consist of the construction of a new two-story building addition to the existing Desert Valley Hospital. The project site is currently mostly developed, consisting of a hospital campus and empty lot. The project would introduce new impervious surfaces to the project site, which in turn could interfere with groundwater recharge. The project site is within the Victor Valley groundwater basin, which is part of the Upper Mojave River Valley and is designated as a very low priority (DWR 2020). As discussed in Section 3.19, Utilities and Service Systems, the Victorville Water District (VWD) is expected to adequately supply water for the project. The project would not require any additional groundwater extraction and would not deplete groundwater supplies. The project would not impede sustainable groundwater management and impacts would be less than significant.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on or off site;

Less than Significant Impact. The project site is currently mostly developed. During project construction there would be increased potential for erosion on site from exposed soils. Once the project is in operation, there would be an increased amount of impervious surfaces on the project site. As described in Appendix F, runoff from the project site would be managed through a drainage system divided into three areas. Drainage Areas A and B, with high impervious coverage, would direct stormwater into underground pipes leading to catch basins, while Drainage Area C would channel runoff to an aboveground infiltration basin. These would not result in alteration to drainages off site. Therefore, the project would not result in substantial erosion or siltation due to changes in drainage patterns, and as such, impacts would be less than significant.

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

Less than Significant Impact. As discussed above, the project site is currently mostly developed. The project site is relatively flat and does not currently result in flooding. On-site drainage facilities and off-site drainage connections would be designed to collect and convey runoff from 100-year storm events. Implementation of the proposed project would not increase surface runoff that would result in flooding, and impacts would be less than significant.

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

Less than Significant Impact. As discussed above, the proposed project would modify surface runoff patterns due to the introduction of additional impervious surfaces from the building addition. This increased runoff would be captured via storm drain inlets and piping, which would direct the water to an on-site retention system designed to handle the additional volume. Although the project would result in increased runoff due to the added impervious cover, this increase would not exceed the capacity of existing or planned stormwater drainage systems (Appendix F). As discussed in Section 3.19, the project would not exceed the existing capacity of the City's stormwater drainage systems. Because the project would not substantially change the runoff contributing to the drainage systems, impacts would be less than significant.

iv) impede or redirect flood flows?

Less than Significant Impact. The project would increase the impervious surface area on site compared to existing conditions, increasing runoff flow rates or volumes. Additionally, hydrologic calculations using San Bernardino County's Rational Method indicate that peak runoff would increase for 2-year, 10-year, and 100-year storm events. However, the project would incorporate additional storm drain inlets and piping to manage the increased runoff, directing it to an on-site retention system designed to handle the additional volume. According to the Hydrology Report, the proposed stormwater facilities would be sufficient to meet the requirements set by the City and San Bernardino County (Appendix F). Implementation of the proposed project is not expected to impede or redirect flood flows, and impacts to stormwater drainage would be less than significant.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Impact. The project site is located outside of the 100-year and 500-year flood zones as identified by the Federal Emergency Management Agency (FEMA 2016). Additionally, the site does not fall within a potential inundation zone for seismically induced dam or reservoir failure, according to the San Bernardino County General Plan (San Bernadino County 2020). The project site is not located in a coastal area, and there are no large water storage facilities nearby. Consequently, there is no risk of seismically induced flooding due to seiche or tsunami. Therefore, the project is not expected to pose a significant risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones, and no impact would occur.

e) ***Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less than Significant Impact. The project site is located within the Victor Valley groundwater basin, which is classified as a very low priority basin and thus is not required to prepare a sustainable groundwater management plan. A project specific Water Quality Management Plan has been included as Appendix G to the MND, which details strategies to maintain compliance with local and state water quality requirements. Given that the project would adhere to these established guidelines and contribute to effective stormwater management practices, it would not conflict with or obstruct the implementation of the City's water quality control plan or the basin's groundwater management practices. Therefore, impacts would be less than significant.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Less than Significant Impact. The project site is located on a medical campus that is bound by Bear Valley Road (south), Jasmine Street (north), 1st Avenue (east), and 2nd Avenue (west). The ED and Med Surg Unit construction would be located within the boundary of the existing medical campus. Implementation of the project would not physically divide an established community because the project components would redevelop an area that has already been developed; impacts would be less than significant.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The City of Victorville's General Plan and Municipal Code regulate planning and development within the City. The project site is currently zoned as General Commercial (C-2T) and has a land use designation of Commercial (Figure 4, Land Use Designation).

The project would be consistent with the Development Code requirements for the applicable zone (C-2T) by focusing on expanding healthcare services and improving infrastructure. This zoning designation is meant to accommodate a range of commercial uses, particularly those that cater to high traffic volumes and provide services to both local residents and travelers.

The project would be subject to the development goals, standards, and guidelines established in the General Plan. According to the General Plan, the General Commercial (C-2T) land use designation "provides for a wide range of commercial uses to serve the day-to-day needs of Victorville residents, as well as to support the City's economy by attracting and serving the regional population and long-distance travelers and tourists." (City of Victorville 2008b). Therefore, the project would be consistent with the site's existing land use designation. The City's General Plan also includes several goals and policies that are applicable to the project. An analysis of the project's consistency with these goals and policies is provided in Table 3.11-1.

Table 3.11-1. Consistency with Land Use Element Objectives/Policies

Land Use Objective/Policy	Project Applicable Component(s)	Consistency
Objective A Achieve and maintain an appropriate balance, variety, and distribution of commercial uses that provide for the retail, business, professional, medical/dental, and other commercial and service needs of the City's residents and will attract customers and visitors from the region and beyond.	The project would expand critical medical services to meet the growing needs of the City's residents, enhancing the variety and distribution of essential healthcare facilities and attracting visitors from the region and beyond for comprehensive medical care.	Consistent
Policy A.2 Encourage the development of local-serving commercial uses in proximity to adjacent residential neighborhoods to serve the day-to-day needs of Victorville's residents.	The project would enhance local medical services within the community, thereby providing essential healthcare facilities in close proximity to adjacent residential neighborhoods to meet the day-to-day needs of Victorville's residents.	Consistent
Policy A.4 Prioritize infill commercial development before redesignating non-commercial property to commercial land uses.	The project would involve the expansion of an existing healthcare facility within an established urban area, utilizing infill development on a site already designated for commercial use rather than converting non-commercial land to commercial purposes.	Consistent
Policy F.1 Encourage infill development, redevelopment of underutilized sites and reuse of existing commercial and industrial buildings before expanding in undeveloped areas within Victorville to enhance community character, optimize infrastructure investments, support increased transit use, promote non-motorized transportation, and enhance commercial viability.	The project would focus on infill development through the expansion of Desert Valley Hospital, which would revitalize an existing site and optimize the use of existing infrastructure, enhancing community character and promoting the efficient use of resources before considering expansion into undeveloped areas.	Consistent
Policy H.6 Incentivize new buildings to maximize energy conservation design to promote solar energy generation, natural ventilation, effective use of daylight, and on-site electricity generation.	The project would incorporate sustainable design features, such as energy-efficient glazing and reflective roofing, which would promote energy conservation, support natural ventilation, and enhance the overall energy performance of the new building addition.	Consistent

Table 3.11-1. Consistency with Land Use Element Objectives/Policies

Land Use Objective/Policy	Project Applicable Component(s)	Consistency
Objective J Promote a community environment that support the overall health and well-being of those who live and work in Victorville and Victor Valley.	The project would enhance the Desert Valley Hospital with a new Emergency Department and Medical-Surgical Department, which would directly contribute to the health and well-being of residents and workers in Victorville and the surrounding Victor Valley by improving access to critical medical services.	Consistent
Policy J.1 Ensure that there is adequate land for state-of-the-art medical facilities to support the needs of the population as it grows and changes over time.	The project would involve the construction of a new, state-of-the-art building addition at Desert Valley Hospital, which would expand the facility's capacity to meet evolving medical needs and support the growing population over time.	Consistent
Policy M.5 Require land uses and developments to be sited and designed to mitigate potential health and safety impacts related to odors, dust, noise, chemicals, hazardous materials and wastes, and other negative externalities on adjacent uses, with special consideration for sensitive receptors (e.g., hospitals, schools, daycare facilities, senior housing and convalescent facilities, etc.) and vulnerable populations.	The project would incorporate design measures to alleviate potential health and safety impacts, such as managing construction dust and noise, ensuring safe handling of materials, and implementing controls to minimize disruptions, thereby safeguarding adjacent sensitive receptors and vulnerable populations.	Consistent

As described in Table 3.11-1, the project would be consistent with the applicable goals and policies set forth by the General Plan. Therefore, impacts would be less than significant.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) ***Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***

No Impact. The City is designated as Mineral Resource Zones (MRZ) 2a, 2b, and 3a by the Division of Mines and Geology. Areas classified as MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves as determined by such evidence as drilling records, sample analysis, surface exposure, and mine information. Areas classified as MRZ-2b contain discovered mineral deposits that are significant inferred resources as determined by their lateral extension from proven deposits or their similarity to proven deposits. Areas classified as MRZ-3 are known mineral occurrences of undetermined mineral resource significance (City of Victorville 2008a). Given that the project site and the majority of the City is already developed, mineral extraction or mining would be incompatible with the existing zoning of the project site. No impact would occur.

b) ***Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

No Impact. As stated above, the City of Victorville General Plan has identified the entire City as being within MRZ-2 and MRZ-3 but has not identified a locally important mineral resource recovery site. Additionally, because the project site has been previously developed, mineral extraction and mining would be an incompatible use. No impact would occur.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

a) ***Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Less than Significant Impact.

Construction Noise

Construction noise is anticipated to vary by phase and distance from sensitive receptors. Noise levels are predicted to range from approximately 48 A-weighted decibels (dBA) 8-hour sound equivalent level ($L_{eq\ 8\text{-}hr}$) to 66 dBA $L_{eq\ 8\text{-}hr}$ at the nearest residential areas. These levels are below the 80 dBA $L_{eq\ 8\text{-}hr}$ threshold set by the Federal Transit Administration. On-site construction is expected to use standard equipment that could generate maximum noise levels around 90 dBA at 50 feet. However, as construction activities are intermittent and noise decreases with distance, the estimated noise levels at nearby residential areas would be between 48 dBA $L_{eq\ 8\text{-}hr}$ and 62 dBA $L_{eq\ 8\text{-}hr}$. As shown in Table 3.13-1, these levels are below the significant impact threshold of 80 dBA $L_{eq\ 8\text{-}hr}$.

Table 3.13-1. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Nearest Receiver Distances ($L_{eq\ 8\text{-}hr}$ [dBA])			
	Nearest Residential Use to the South		Nearest Residential Use to the North	
	Nearest Source/Receiver Distance (Approximately 240 feet)	Typical Source/Receiver Distance (Approximately 500 feet)	Nearest Source/Receiver Distance (Approximately 950 feet)	Typical Source/Receiver Distance (Approximately 1,100 feet)
Demolition	66	62	55	54
Grading	65	60	54	53
Building Construction	59	58	50	50
Paving	62	58	52	51
Architectural Coating	51	48	41	40

Source: Appendix H.
Notes: $L_{eq\ 8\text{-}hr}$ = 8-hour equivalent continuous sound level; dBA = A-weighted decibel.
Typical construction noise levels are calculated based on the acoustic center distances between the nearest sensitive receptors and the construction phase. Noise measurement locations are shown in Figure 7.

Construction traffic, peaking at 244 daily round trips, is projected to cause only minor increases in noise levels compared to the existing operational traffic, with a maximum increase of 0.3 dBA CNEL.

Operations Noise Generation

The project would introduce new sources of stationary noise, including HVAC equipment; parking lot activities; and an emergency backup generator. The parking lot is projected to generate an hourly average noise level of 53 dBA sound equivalent level (L_{eq}) at 50 feet from the source, which is based on peak trip rates and continuous activity. Rooftop HVAC equipment is expected to generate noise levels of up to 75 dBA at the source, with the sound attenuation effect of a 3.5-foot parapet not factored into the initial calculations, potentially reducing the impact. The emergency backup generator, enclosed in a soundproof enclosure, would produce a noise level of 85 dBA L_{eq} at 1 meter. Table 3.13-2 details these findings, showing that the combined noise from these sources would remain well below 55 dBA L_{eq} at residential property lines. The project's operational noise levels are expected to be at least 20 dBA L_{eq} lower than existing ambient noise levels.

Table 3.13-2. Summary of Results for Mechanical and Parking Lot Operations Noise Analysis

Modeled Operational Noise Levels at Closest Residences (dBA L_{eq})		
Receiver	Project Stationary Sources Operational Noise Levels	Existing Ambient
R1/ST1	46.7	67.6
R2/ST2	27.4	64.6
R3/ST3	36.5	63.6
R4/ST4	35.3	66.3

Note: dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level. R=receiver; ST= Station

Sound Levels from Combined On-Site Noise Sources

Modeling of combined noise from HVAC units, parking lot activities, and the emergency generator using CadnaA software indicates that operational noise levels would be below 55 dBA L_{eq} at the property line. The predicted noise levels are also at least 20 dBA L_{eq} lower than the existing ambient noise levels. Given these results, the combined on-site noise sources would not exceed local noise standards.

Transportation Noise Exposure

The analysis of roadway noise, as detailed in the noise technical report (Appendix H.1), indicates that the project's contribution to traffic noise would be minimal. As shown in Table 3.13-3, the increase in traffic noise due to the project would be less than 1 decibel (dB) community noise equivalent level (CNEL) across evaluated roadway segments. Impacts for baseline noise levels already exceeding 65 dB CNEL would be considered significant if the predicted increase is more than 1.5 dB CNEL. Similarly, under cumulative traffic scenarios for 2037, the project's impact would remain well below the threshold for significant cumulative noise impacts.

Table 3.13-3. Modeled Traffic Noise Levels for Selected Roadway Segments (dBA CNEL)

Street Segment	2027	2027 + Project	Difference	2037	2037 + Project	Difference
2nd Avenue north of Bear Valley	65.3	65.6	0.3	68.3	68.5	0.2
Bear Valley east of Bornite	70.8	70.8	0	71.8	71.9	0.1
1st Avenue north of Jasmine Street	58.7	58.7	0	59.5	59.5	0
Jasmine Street east of 2nd Avenue	63.7	63.8	0.1	66.3	66.4	0.1

Sources: Appendix H and FHWA 2008TNM 2.5.
Note: dBA = A-weighted decibel; CNEL = community noise equivalent level.

Helipad Noise Exposure

As described in Appendix H.2, the number of flights per day are not anticipated to increase under the proposed project, however the flightpath will change compared to existing conditions. The analysis of the change in noise from the existing helipad compared to the new flight alignment is detailed in the Emergency Department Helipad Noise Analyses Memorandum (Appendix H.2). The predicted hourly L_{eq} helicopter flight noise emission levels, depicted as noise contours at approximately four meters above grade for seven helicopter operation scenarios were converted to CNEL values and then logarithmically added to the background CNEL values for each of the 18 noise sensitive receptor (NSR) listed in Table 3.13-4. As shown in Table 3.13-4, the decibel difference between the loudest proposed helipad conditions case and the existing helipad conditions case is highest for model positions "R13" and "R14" and are anticipated to experience a 3 dB change in CNEL. However, such increases and all others listed are compliant with Federal Interagency Committee on Noise (FICON) and therefore impacts would be less than significant.

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Table 3.13-4. Predicted CNEL by Modeled Helicopter Flight Path Scenario and FICON-based Impact Significance Assessment

Studied Nearby Noise Sensitive Receiver (NSR)	Estimated Background CNEL	CNEL including *Existing* DVH Helicopter Operation (by flight path direction from helipad)			CNEL including *Proposed* DVH Helicopter Operation (by flight path direction from helipad)				Largest dBA Change between Existing and Proposed CNEL including Helicopter Operations	Predicted Impact per FICON?
		North	Northeast	Southeast	Northeast	East	Southwest	West		
R01 - Wimbledon Luxury Apts - east	66	66	67	66	67	66	66	66	0	no
R02 - Wimbledon Luxury Apts – west [4]	66	67	67	66	67	66	66	66	0	no
R03 - High Desert Villas - east	65	66	66	65	66	65	65	65	-1	no
R04 - High Desert Villas – west [3]	64	67	64	64	65	64	64	64	-3	no
R05 - 12340 Highgate Avenue	65	66	65	65	65	65	65	65	-1	no
R06 - 16687 Jasmine Street [2]	65	65	65	65	65	65	65	65	0	no
R07 - 12336 Pismo Lane	59	59	59	59	59	59	59	60	1	no
R08 - 12222 Jason Lane	61	61	61	61	61	61	61	63	2	no
R09 - 12081 Third Avenue	68	68	68	68	68	68	68	68	0	no
R10 - Desert Meadow Apts - north	65	65	65	65	65	65	66	66	1	no
R11 - Desert Meadow Apts - southeast	63	63	63	63	63	63	65	64	2	no
R12 - 16632 Sequoia Street - north	65	65	65	65	65	65	67	66	2	no
R13 - 16632 Sequoia Street - south	63	63	63	63	63	63	66	64	3	no
R14 - 12001 Second Avenue	64	64	64	64	64	64	67	65	3	no
R15 - 16723 Sequoia Street	62	62	62	62	62	62	64	63	1	no
R16 - 11985 Bornite Avenue	62	62	62	63	62	63	63	62	0	no
R17 - 12048 Bornite Avenue [1]	68	68	68	69	68	68	68	68	0	no
R18 - 16868 Sequoia Street	64	64	64	65	64	65	64	64	0	no

Notes: DVH = Desert Valley Hospital; CNEL = Community Noise Equivalent Level; dBA = A-weighted decibel; FICON = Federal Interagency Committee on Noise; 1 = Noise Assessment Technical Report (NATR) ST1 position; 2 = NATR ST2; 3 = NATR ST3; 4 = NATR ST4.

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Results

The project's impact on ambient noise levels would be less than significant based on the findings of the noise technical report (Appendix H.1) and Helipad Noise Analyses Memorandum (Appendix H.2). The report confirms that noise emissions from all operational sources—including HVAC systems, parking lot activity, and the emergency backup generator—would remain below the threshold of 60 dBA L_{eq} at residential property boundaries. Additionally, construction-related noise, encompassing on-site equipment and off-site traffic, would not exceed the 80 dBA $L_{eq\ 8\text{-}hr}$ threshold. Additionally, the changes to the flight path resulting from the proposed project would not represent a significant increase in noise. Therefore, the noise and vibration levels generated by the project are anticipated to be within acceptable limits, resulting in impacts that would be less than significant.

b) ***Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

Less than Significant Impact. The potential for ground-borne vibration from construction activities was assessed using data and methods recommended by the California Department of Transportation (Caltrans 2020) and detailed in the noise technical report (Appendix H.1). Construction activities such as land clearing and the use of heavy-duty equipment could produce ground-borne vibrations; these vibrations were evaluated based on attenuation rates and distance from the construction site. As shown in Table 3.13-5, vibration levels at the nearest existing structures, including a hospital building 45 feet from the construction boundary and a single-family residence approximately 285 feet away, would be below the damage thresholds established for these types of buildings. Specifically, vibrations at the hospital would not exceed 0.037 inches per second (ips) peak particle velocity (ppv), and those at the residence would not exceed 0.002 ips ppv; both of these measurements are well below the 0.5 ips ppv threshold for commercial buildings and 0.25 ips ppv for residential structures. Consequently, the ground-borne vibration impacts from construction activities would be less than significant.

Table 3.13-5. Calculated Construction Vibration Levels at Closest Existing Structures

Receiver Location	Equipment	Distance to Construction (feet)	Calculated Vibration Level (ppv)	Building Damage Standard (ppv)	Less Than Building Damage Standard (ppv)?
Hospital	Drill rig/auger	45	0.001	0.5	Y
	Loaded trucks		0.014		Y
	Jackhammer		0.031		Y
	Small dozer		0.037		Y
Residence	Drill rig/auger	285	0.00	0.25	Y
	Loaded trucks		0.001		Y
	Jackhammer		0.002		Y
	Small dozer		0.002		Y

Source: Appendix H.
Note: ppv = peak particle velocity; Y = yes.

For operational vibrations, the project would include HVAC equipment and other mechanical systems that could potentially produce vibration. However, these sources are of limited scale and are designed with vibration isolation systems, such as dampeners or springs, to minimize vibration transmission. The noise technical report (Appendix H.1) indicates that these vibrations would be minor and contained within the building, with no significant impact on adjacent structures or residential areas. Therefore, long-term ground-borne vibration impacts would also be less than significant.

The project is not expected to generate excessive ground-borne vibration or noise levels. Both construction and operational vibrations are predicted to remain well within acceptable limits, ensuring that impacts on surrounding structures and residential areas would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant Impact. The project is not situated within the vicinity of a private airstrip or within 2 miles of a public airport. The project site is not located within an airport land use planning area. The Hesperia Airport is approximately 6.4 miles south of the project site. The project site is not located within the airport influence areas, including conical surfaces and noise contours (San Bernadino County ALUC, 1991). Therefore, potential noise impacts related to aircraft operations would be less than significant.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. The proposed project would include the addition of a new ED and Med Surg Unit. The project would not introduce any new housing as part of the project but would expand the capacity of the medical campus with the expanded ED. The project is expected to result in an increase of 150 employees.

The Southern California Association of Governments forecasts population growth at a local and regional level for six counties in Southern California including San Bernardino County and the City of Victorville. As shown in Table 3.14-1, employment within Victorville is expected to increase by 20,000 jobs by 2040. The increase of 150 jobs from the project would represent 0.8% of the total expected increase in jobs for the City. Therefore, the addition of 150 jobs would be within the forecasted growth of jobs within the area.

Table 3.14-1. City of Victorville Population and Employment Forecast

	2016	2045	% Change
Population	123,300	194,500	57.7%
Employment	41,200	61,200	48.5%

Source: SCAG 2020a.

The project would include a new service yard on the northeast portion of the project site to accommodate utilities for the building addition. The service yard would include a pump house, a cooling tower, a chiller room, a normal power electrical room, and an emergency power electrical room to support hospital uses. The project would not expand any other existing utilities or infrastructure as part of either project component. The project would not require any expansion that could indirectly lead to population growth.

In conclusion, the project is expected to introduce 150 jobs to the City, which is within the forecasted growth of employment for the City, and the project would not require substantial expansion of infrastructure from the introduction of these jobs. Direct or indirect impacts from unplanned population growth would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed ED expansion and Med Surg Unit would occur within the medical campus and would replace an existing dirt lot and helipad. The project would not displace any existing people or residences through project implementation. No impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐.

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

Fire protection?

Less than Significant Impact. Fire protection and emergency response services for the project site are provided by the Victorville Fire Department, which operates five fire stations within the City (City of Victorville 2020a). The nearest fire station to the project site is Victorville Fire Station 314, located approximately 0.9 miles way at 17008 Silica Drive, Victorville, California.

As concluded in Section 3.14, Population and Housing, the project would not result in a substantial increase in the population of the area and therefore would not result in the increased demand for fire protection services to the project site. Additionally, as concluded below in Section 3.20, Wildfire, the project would not result in an increased risk of fire hazards on the project site, which also would not result in an increased demand for fire protection services. Physical impacts associated with the addition of new fire protection facilities resulting from the project would be less than significant.

Police protection?

Less than Significant Impact. The City has its own police department that provides police protection to the City alongside the San Bernardino County Sheriff's Department. Victorville Police Department is located approximately 4.3 miles away from the project site at 14200 Amargosa Road, Victorville, California (City of Victorville 2020b). The project would include the addition of an ED and Med Surg Unit. As concluded in Section 3.14, the project would not result in a substantial increase in the population of the area and therefore would not result in the increased demand for police protection services to the project site.

Additionally, the project would be required to pay a development impact fee for public improvements, public services, and community amenities, as required by Victorville Municipal Code Section 16-5.01.080. Physical impacts associated with the addition of new police protection facilities resulting from the project would be less than significant.

Schools?

Less than Significant Impact. The project does not have a residential component and, as concluded in Section 3.14, the project would not result in a substantial increase in the population of the area. Therefore the project would not result in an increased demand for schools servicing the project site. Physical impacts associated with the addition of new schools resulting from the project would be less than significant.

Parks?

Less than Significant Impact. The project does not have a residential component and, as concluded in Section 3.14, the project would not result in a substantial increase in the population of the area. Therefore, the project would not result in an increased demand for parks in the vicinity of the project site. Physical impacts associated with the addition of new parks resulting from the project would be less than significant.

Other public facilities?

Less than Significant Impact. The project does not have a residential component and, as concluded in Section 3.14, the project would not result in a substantial increase in the population of the area. Therefore the project would not result in an increased demand for any other public facilities servicing the project site. Physical impacts associated with the addition of new public facilities resulting from the project would be less than significant.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. As stated above, the project consists of the addition of a new ED and Med Surg Unit and would not include a residential component. As concluded in Section 3.14, the project is not expected to substantially increase population growth in the area and therefore would not substantially increase the uses of the recreational facilities in proximity to the project site. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The project consists of the expansion of an existing ED. The project would not include any recreational facilities. No impact would occur.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The following analysis is based on the Traffic Study Report prepared for the proposed project by STC Traffic Inc. and included as Appendix I.

a) ***Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

Less than Significant Impact. The project proposes the expansion of an existing ED consisting of a new two-story building adjacent to the existing hospital with direct connections on both floors. The Circulation Element of the General Plan outlines goals and policies that ensure adequate traffic capacity and parking and encourage the use of alternative modes of transportation and public transportation. As discussed in Appendix I, off-site improvements associated with the project would include pedestrian and bicycle access via sidewalk exits along portions of the roadway segments near the project site, with intermittent gaps. Class II bike lanes exist on Hesperia Road, although no bicycle facilities are present along other roadway segments near the project site. The project proposes to construct a sidewalk along the project frontage on Bear Valley Road. Within the project site, the project would include Americans with Disabilities Act (ADA) compliant pedestrian accessways to connect the parking lots with the hospital buildings. Due to the project's consistency with the Circulation Element, impacts from conflicts with transportation policies would be less than significant.

b) ***Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

Less than Significant Impact. The City's adopted VMT metric is included within the City of Victorville General Guidelines for Conducting Traffic Studies and Determination of Intersection Level of Service and Improvement Needs (City of Victorville 2005) and the City's Vehicle Miles Traveled Analysis Guidelines (City of Victorville 2020c). As described in Appendix I, the City's guidelines state that projects that generate less than the City's daily vehicle trip threshold of 1,285 weekday daily trips should be screened out from needing to perform a VMT analysis and presumed to have a less than significant VMT impact. The project would generate 862 weekday daily trips with 66 trips during the AM peak hour and 69 trips during the PM peak hour. The number of trips that would be generated by the project would be less than 1,285 weekday daily trips, and the project would screen out of further VMT analysis. Therefore, due to the small nature of the project, VMT analysis is not required and impacts would be less than significant.

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

Less than Significant Impact. The project, which involves adding a new ED and Med Surg Unit to Desert Valley Hospital, is designed to improve site accessibility and safety without introducing hazardous geometric features. The project would include a new entrance from a relocated driveway along Bear Valley Road, which would direct traffic to an ED canopy at the south end of the addition for convenient patient drop-off. The design would also incorporate new parking facilities to the east, with well-marked sidewalks and crosswalks leading to the ED entry.

To enhance site access, two additional driveways would be constructed—one along Bear Valley Road and another at 1st Avenue — optimizing traffic flow and parking capacity. The project would add 162 new parking stalls, increasing the total to 943, with designated accessible parking, clean air stalls, and spaces for future electric vehicle charging. Emergency vehicle access would be supported by a dedicated Ambulance Canopy, which would include four ambulance parking spaces and an additional four for emergency vehicle overflow.

All design features would adhere to the California Fire Code and would avoid any potentially hazardous elements such as sharp curves or dangerous intersections. Additionally, the project would align with the existing zoning designation and would not introduce incompatible uses. Consequently, the project would not result in substantial hazards due to geometric design features or incompatible uses, and impacts would be less than significant.

d) Would the project result in inadequate emergency access?

Less than Significant Impact. The project would include an addition to Desert Valley Hospital consisting of a new ED and Med Surg Unit, with specific provisions to facilitate efficient emergency response. A dedicated Ambulance Canopy would be constructed at the north end of the new building addition, offering four designated parking spaces for ambulances and an additional four spaces for emergency vehicle overflow. Additionally, the project would feature multiple access points, including a newly relocated driveway along Bear Valley Road and additional driveways at Bear Valley Road and 1st Avenue. During construction, access to the hospital, including for emergency vehicles, would be maintained. Existing emergency access routes, including those for ambulances, would remain operational. The design and layout would conform to applicable safety standards and guidelines, including those outlined in the California Fire Code (Title 24, Part 9), specifically the following:

- California Fire Code Section 503: This section requires access roadways to be provided to facilitate the movement of fire department apparatus to buildings and establishes criteria for the layout and design of fire access roads.
- Victorville Municipal Code Section 16.12.020: This section adopts the California Fire Code and mandates compliance with the standards and guidelines set forth in the state code.

As such, the project would provide adequate emergency access, and impacts would be less than significant.

3.18 Tribal Cultural Resources

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

a, b) 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?

Less than Significant Impact. Evaluation of cultural resources included a search of the CHRIS records, a review of the Native American Heritage Commission Sacred Lands File, and consultation with interested parties such as the Mohave Historical Society, the Victor Valley Legacy Museum, and the Victor Valley Museum. Additionally, the evaluation included background research, an archaeological pedestrian survey, and an assessment of built environment resources (Appendix D).

According to the criteria established by California Public Resources Code Section 21074, Appendix D concluded that there are no significant tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or local registers within the project site. While isolated prehistoric artifacts and a built environment resource (Bear Valley Cutoff) were identified, none meet the criteria for significant cultural value to a California Native American tribe as specified in California Public Resources Code Section 5024.1(c).

Thus, it is concluded that the project is not expected to cause a substantial adverse change in the significance of tribal cultural resources as defined by the California Public Resources Code. Recommendations include ongoing monitoring and procedures for addressing any inadvertent discoveries during construction to ensure adherence to cultural resource protection guidelines. Therefore, impacts would be less than significant.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. The project would include the expansion of an existing ED consisting of the construction of an additional building.

Water

VWD currently serves the project site. The VWD 2020 Urban Water Management Plan (UWMP) analyzes the water demand and water supply for 2020 to 2045. The 2020 UWMP analysis is based on projected growth rates for the 2020–2045 period, considering factors such as economic conditions, demographic trends, historical growth patterns, and regional developments. The total gross water use in 2020 was estimated to be 23,452 acre-feet per year and is projected to increase to 32,699 acre-feet per year in 2045. The projected water supplies for the district are expected to match the projected demand (VWD 2021).

The project would increase the number of hospital treatments bays by constructing a new ED including a Med Surg Unit. Water use during construction is expected to be temporary and minimal. While the project would increase the water use on the project site, the project would be consistent with the land use designation for the site, which was factored into the UWMP projections. Additionally, the project would comply with and be subject to the 2022 California Building Code Title 24 (24 CCR Part 6).

In conclusion, the increase in water usage from the project is expected to be met by the VWD during normal and dry years and would not require the construction of new facilities to supply water to the area. Impacts would be less than significant.

Wastewater Treatment

The City's wastewater treatment involves a combination of local and regional facilities. Wastewater generated within the VWD service area is collected via a gravity sewer system operated by the City. This system routes a portion of the wastewater to the industrial wastewater treatment plant (IWTP), which VWD operates. The IWTP, with a design capacity of 2.5 million gallons per day (MGD), employs both anaerobic and aerobic treatment processes, followed by a membrane bioreactor and ultraviolet disinfection to meet tertiary treatment standards. Treated effluent that is not reused is sent to the Victor Valley Wastewater Regional Authority (VVWRA) for further processing. VVWRA's regional treatment plant, located about 7 miles north of the City, has a capacity of 14 MGD. It treats wastewater to tertiary standards and discharges disinfected effluent to the Mojave River, while excess treated water is available for use by VWD. VVWRA's operations are governed by agreements ensuring environmental protection and efficient water reuse (VWD 2021). The project proposes the expansion of a medical campus consisting of the construction of an additional building. Wastewater during construction is expected to be temporary and minimal. The project applicant would be required to obtain a will serve letter from the VWD. The will serve letter would ensure that VWD would be able to adequately serve the project site and not require the construction of new facilities to provide services to the project site. Therefore, impacts to wastewater facilities would be less than significant.

Stormwater Drainages

Less than Significant Impact. As discussed in Section 3.10, Hydrology and Water Quality, the project would not substantially increase the volume or rate of runoff from the project site. The Hydrology Report, included as Appendix F to the MND, concludes that runoff from the project site would be similar to existing conditions, ensuring no substantial impact on stormwater drainage infrastructure. As concluded in Appendix F, runoff from the project site would be similar to existing conditions. Project implementation would not result in the need to expand or create new stormwater facilities, and therefore, impacts would be less than significant.

Electric Power

As discussed in Section 3.6, Energy, the project would consume approximately X kWh per year and the non-residential electricity demand in 2020 was X kWh (X gigawatt-hours) for San Bernardino County. Electricity use during project construction would be temporary and negligible. As such, the project would have a negligible impact on demand for San Bernardino County and SCE. The project would not significantly increase demand for electricity and would not require the expansion of or construction of electric power facilities, therefore impacts would be less than significant.

Natural Gas

As discussed in Section 3.6, Energy, natural gas is not anticipated to be required during construction of the project, and the project operation is estimated to consume approximately X kilo-British thermal units per year. The non-residential natural gas consumption in 2020 was X kilo-British thermal units for San Bernardino County . As such, the project would have a negligible impact on demand for San Bernardino County and SCE. The project would not significantly increase demand for natural gas and would not require the expansion of or construction of natural gas facilities, therefore impacts would be less than significant.

Telecommunication Facilities

Less than Significant Impact. The project site is currently served by various telecommunication service providers, including AT&T, Spectrum, Viasat, Frontier Communications, and other independent providers. These companies offer services for telephones, internet, and cable television, ensuring comprehensive communication systems for the area. The project would introduce additional demand for telecommunication services as it would introduce a new two-story building addition to the existing Desert Valley Hospital; however, no specific systems upgrades are proposed or anticipated for the proposed project. Due to the existing infrastructure served in the surrounding project area, the proposed project would not result in impacts associated with the construction or expansion of telecommunications, and impacts would be less than significant.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. According to the VWD 2020 UWMP, projected water supplies are expected to meet demand through 2045. In 2020, the total gross water use was estimated at 23,452 acre-feet per year, with a project increase to 32,699 acre-feet per year by 2045. The anticipated increase in water usage from the project would be within these projections and aligns with the land use designation in the UWMP. The existing water supply infrastructure would be able to manage the additional water demand generated by the project. Additionally, the VWD has issues a Will Serve Letter, confirming the ability to provide water service to the project. This letter is included as Appendix J to the MND. The Water Quality Management Plan, included as Appendix G, provides a framework to ensure proper management of stormwater and control of potential pollutants. The project would also comply with 2022 CBC Title 24 water efficiency standards, ensuring that water use is managed efficiently. Therefore, no new water supply facilities are required, and impacts would be less than significant.

c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. As described above, wastewater generated by the project site would be managed by the VWD and treated at the existing facilities. The VWD's wastewater treatment infrastructure includes the IWTP with a capacity of 2.5 MGD and the VVWRA regional treatment plant, which has a capacity of 14 MGD.

The IWTP handles domestic and industrial wastewater with advanced treatment processes, while excess effluent is directed to the VVWRA facility for further processing. Given that the regional plant's capacity is significantly higher than the current and projected wastewater flows, the existing infrastructure is expected to accommodate the additional demand from the project. Thus, the project's expansion, including the construction of a new medical building, would not strain the capacity of the wastewater treatment providers beyond their existing commitments and capabilities; therefore, impacts to wastewater facilities would be less than significant.

d) ***Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Less than Significant Impact. The construction of the proposed two-story building addition would result in the generation of solid waste such as scrap limber, concrete, residual wastes, packing materials, plastics, and demolition material. Municipal Code Chapter 5, Article, 11, Section 16-5.11.060 requires that prior to permitting, documentation shall be provided to the City that demonstrates compliance and indicates the method by which a minimum of 65% of the site's nonhazardous construction and demolition debris waste materials shall be recycled and/or salvaged for reuse, as well as indicates the manner of disposal for the remaining 35% of the construction waster. Additionally, it shall be the responsibility of the permittee to complete the City-provided Construction Waste Management Plan document that shall be presented to, and approved by, the City prior to permitting per MC Section 16-5.11.050 . Once the project is operational, it would increase the intensity of uses at the project site and generate more solid waste compared to the existing medical campus. Solid waste generated in the City would be deposited in the Victorville Landfill, which is operated by San Bernardino County. This landfill is located at 17080 Stoddard Wells Road. It is anticipated that the solid waste provider could provide adequate disposal service, and impacts would be less than significant.

According to the City's General Plan EIR, solid waste generated in the City is collected by Burrtec Waste Industries. Solid waste is sent to Victorville Sanitary Landfill, located in Victorville (CalRecycle 2019a). The total permitted throughput for the landfill is 3,000 tons per day, and approximately 80 million cubic yards of capacity remain (CalRecycle 2019a). The anticipated operational solid waste generation from the project was estimated using the California Department of Resources Recycling and Recovery's Estimated Solid Waste Generation Rates (CalRecycle 2019b). It is estimated that the new ED (68 new treatment bays) would generate approximately 1,088 pounds of solid waste per day (16 pounds per bed) and the approximately 83,369-square-foot building addition would generate approximately 500 pounds of solid waste per day (0.006 pounds per square foot), for a total of 1,588 pounds per day of waste (CalRecycle 2019b). This total does not consider any waste diversion through recycling, which is required by the Victorville Municipal Code, Chapter 5.

The project would be required to comply with applicable state and local regulations related to solid waste, waste diversion, and recycling at the time of development. Implementation of the project is not expected to 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. Impacts related to solid waste would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. As described above, the project would be required to comply with all federal, state, and local statues and regulations related to solid waste, diversion of waste, and recycling. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Bernardino County, California Public Resources Code Section 440001 and California Code of Regulations Title 14, Division 7, Chapter 3 (Section 18000 et seq.) authorize local enforcement agencies to enforce regulations related to solid waste facilities, including the issuance of permits. Victorville Landfill is a permitted facility and Burrtec Waste Industries is a licensed hauler. For these reasons, and the reasons stated above, impacts related to solid waste as a result of project implementation would be less than significant.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City does not currently have an adopted emergency response or evacuation plan. As identified in the General Plan Safety Element, risk of wildfire is low given the geographic location of the City (City of Victorville 2022). The project would include the construction of an ED and a new Med Surg Unit. The hospital would remain open during project construction, and construction would not be expected to substantially change the overall capacity of the ED in the case of an emergency. Once the project is operational, the ED would increase the hospital's capacity to service the City during an emergency. The project would not result in the closure of any roads that could impair evacuation. Additionally, the project would comply with all applicable policies that are identified in the City's General Plan Safety Element. The project would be consistent with all Safety Element policies, and therefore impacts to an adopted emergency response or emergency evacuation plan would be less than significant.

b) ***Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

Less than Significant Impact. The project site is located in a heavily urbanized area and is not located within a high fire hazard severity zone (CAL FIRE 2024). The region is susceptible to extreme heat, droughts, and high winds (City of Victorville 2022), all which increase the risk of wildfires, but due to the heavily developed nature of the project site and the surrounding area, the wildfire risk at the site is considered low. Additionally, the project components would be built to the most recent fire code standards. Impacts would be less than significant.

c) ***Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

Less than Significant Impact. The project site is situated in a heavily urbanized area with a low wildfire risk. The proposed development includes the construction of a new ED and a new Med Surg Unit, as well as both on-site and off-site improvements to enhance parking and traffic flow. The infrastructure improvements associated with this project, including parking facilities and roadway enhancements, would be maintained similarly to the existing medical campus. Given the project's location in a highly developed area with minimal fire risk, it would not introduce new infrastructure or necessitate the maintenance of infrastructure that would significantly exacerbate fire risk. Therefore, the impact would be less than significant.

d) ***Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

Less than Significant Impact. As stated above, the project would have a low risk for wildfire due to the developed nature of the project site and the surrounding area. Additionally, the project site consists of relatively flat terrain due to the location of the project at the valley floor in the Victor Valley and would not expose people or structures to slope instability. As discussed in Section 3.10, drainage on the project site would be managed through a carefully designed drainage system divided into three areas. Therefore, due to the low fire risk and the flat terrain at the project site, the project would not expose people or structures to risks as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

3.21 Mandatory Findings of Significance

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation Incorporated. As described in Section 3.4, Biological Resources, the project site consists of a disturbed and developed area. Due to the developed nature of the project site, the project site does not include habitat that would support fish or wildlife species. As concluded in Section 3.4, the project would result in less than significant impacts related to biological resources with the inclusion of **MM-BIO-1** through **MM-BIO-5.**

Additionally, as discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, there is potential for unanticipated discovery of cultural or tribal cultural resources. Impacts to archaeological and tribal cultural resources would be less than significant with the incorporation of **MM-CUL-1** through **MM CUL-3** (refer to Section 3.5).

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact. As addressed throughout this document, the project would have either no impact, a less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental impact areas. Cumulative impacts of several resource areas have been addressed in individual resource sections, including Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions, and analysis has concluded that cumulative impacts would be less than significant.

Given the nature of the project, potential cumulative impacts could occur during the temporary construction work if other nearby projects occur in the same timeframe. However, given the small scale of the proposed project, the potential for the project to contribute to a cumulative impact when combined with another past, present, and reasonably foreseeable construction projects is low.

As described in Section 3.17, Transportation, project operation would generate a minimal number of trips during operations, which in turn would generate minimal criteria air pollutant emissions, greenhouse gas emissions, and noise. The analysis of these impacts is inherently cumulative in nature, and thus the conclusions that they are less than significant (either with or without mitigation) apply to both project-specific and cumulative impacts. Other resource areas including aesthetics, agricultural and forestry resources, biological resources, energy, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and services systems, and wildfire were determined to have less than significant or no impacts relative to existing conditions; thus, the project would not contribute to cumulative impacts related to these environmental topics. Other issue areas (cultural resources, hazards and hazardous materials, geology and soils, and tribal cultural resources) are, by their nature, project- and/or site-specific, and impacts at one location do not add to impacts at other locations or create additive impacts.

Moreover, no other resource area impacts analyzed as part of this MND would substantially increase when operation of the proposed project is considered in combination with cumulative projects identified in the vicinity. Therefore, operational impacts associated with these combined projects would be negligible. Furthermore, the proposed project, as with potential cumulative projects, would incorporate mitigation measures to reduce impacts and would be required to comply with applicable City and state plans and policies.

For all resource areas analyzed, project impacts would be reduced to less than significant or less than significant with mitigation included, which would, in turn, reduce the potential for these impacts to be considered as additive to an existing cumulative impact. For these reasons, impacts would less than significant.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. As evaluated throughout this document, with the incorporation of mitigation, potential environmental impacts associated with the project would be reduced to less than significant levels. Therefore, with mitigation incorporated, the project would not directly or indirectly cause substantial adverse effects on human beings, and impacts would be less than significant.

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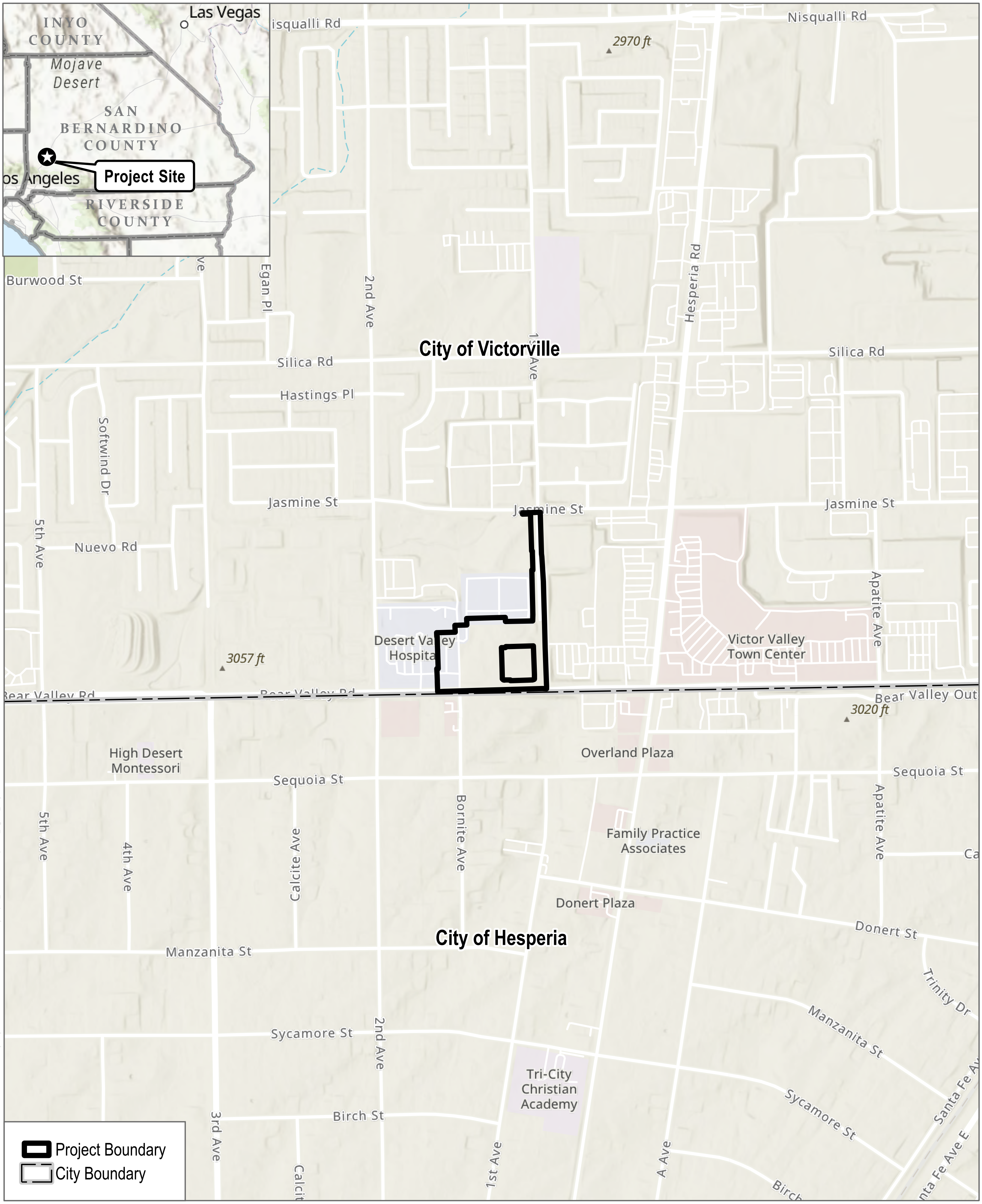

SOURCE: USGS Topo Maps

FIGURE 1

Project Location

Desert Valley Prime Hospital Project

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0 500 1,000 Feet

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SOURCE: Esri World Imagery Basemap; San Bernadino County 2024

DUDEK

0 80 160 Feet

FIGURE 2

Site Plan

Desert Valley Prime Hospital Project

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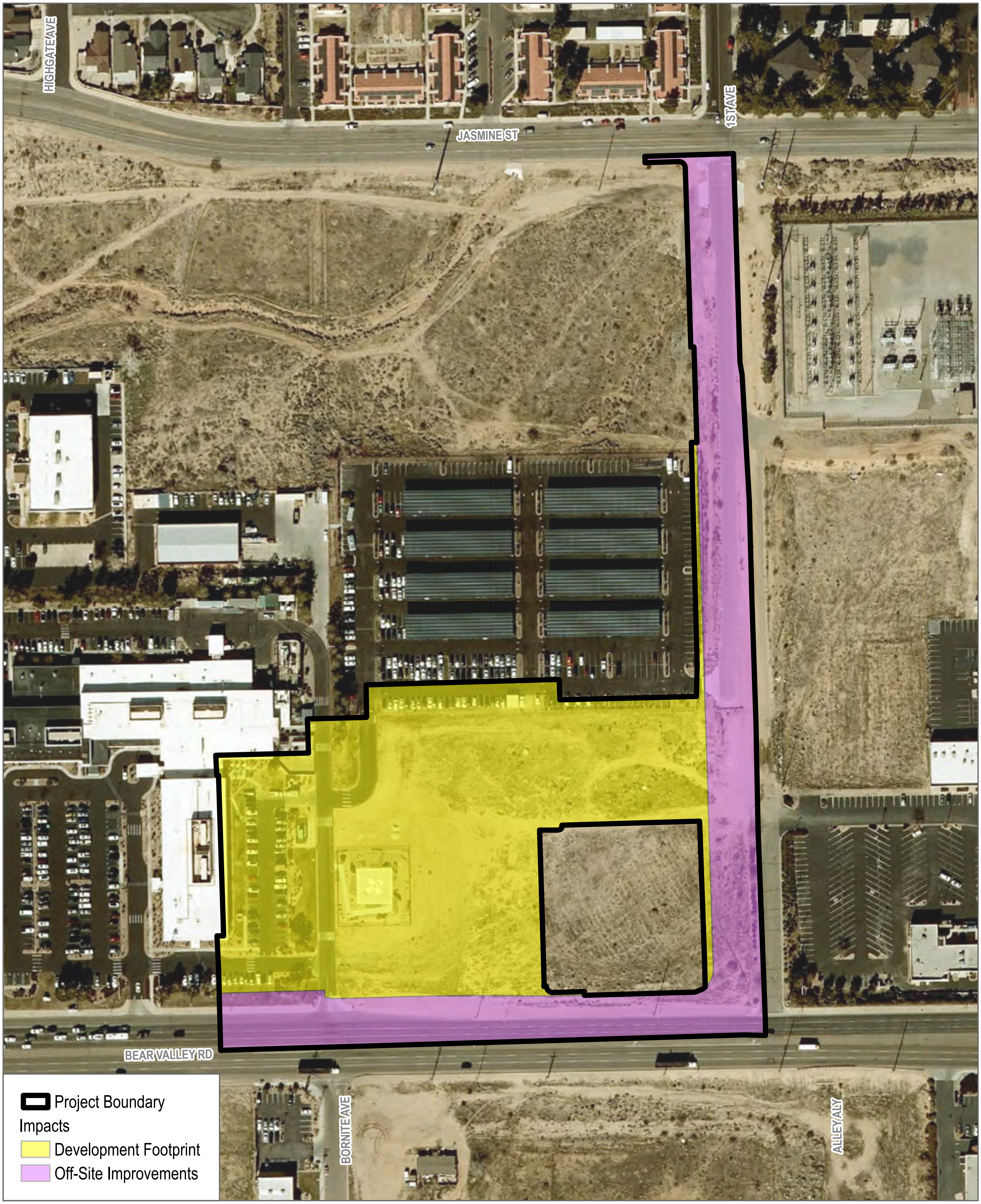

SOURCE: Esri World Imagery Basemap; San Bernadino County 2024

DUDEK

FIGURE 3

Off-Site Improvements

Desert Valley Prime Hospital Project

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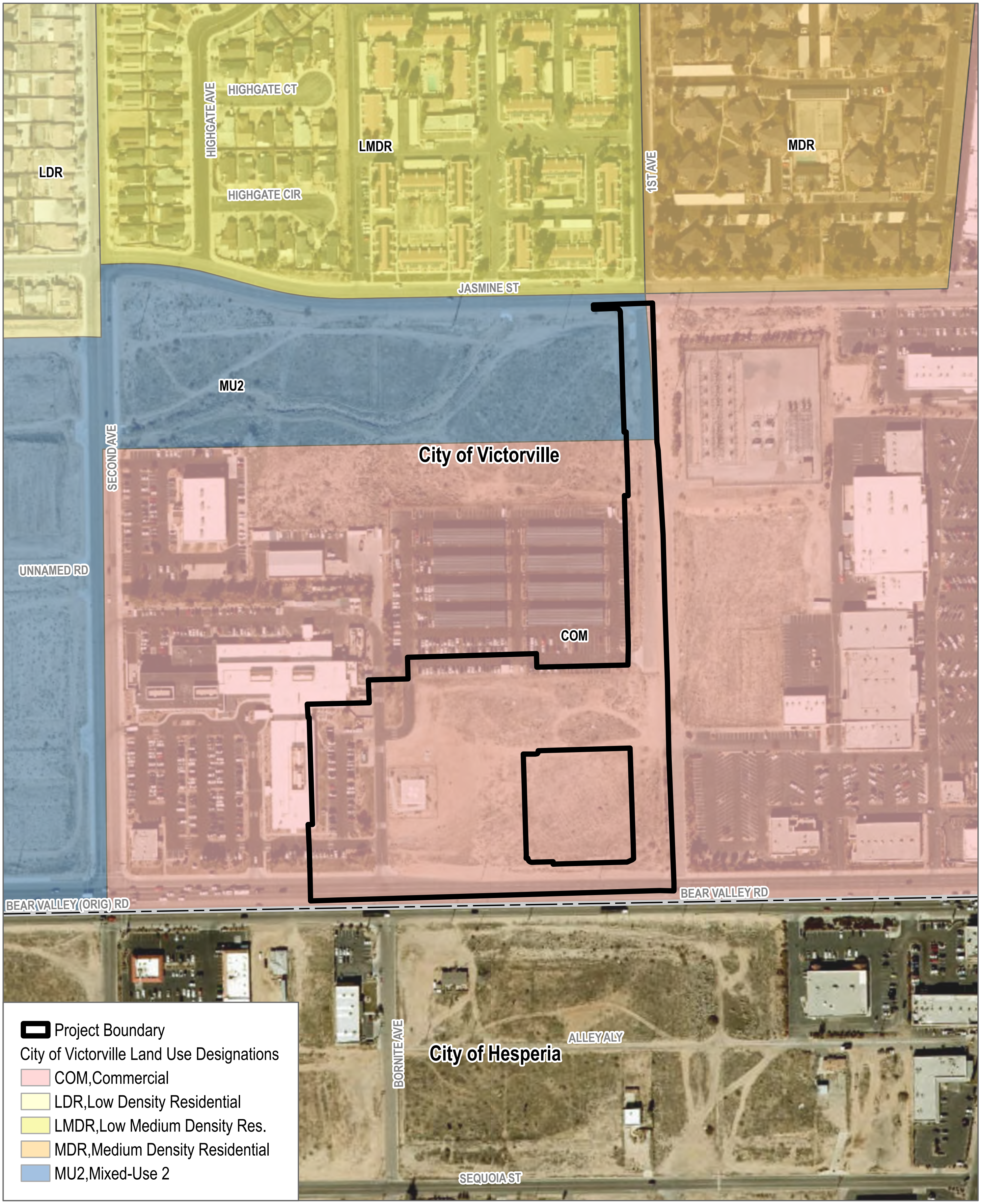

SOURCE: Esri World Imagery Basemap; San Bernadino County 2024; City of Victorville 2024

FIGURE 4

Land Use Designations

Desert Valley Prime Hospital Project

DUDEK

0 150 300 Feet

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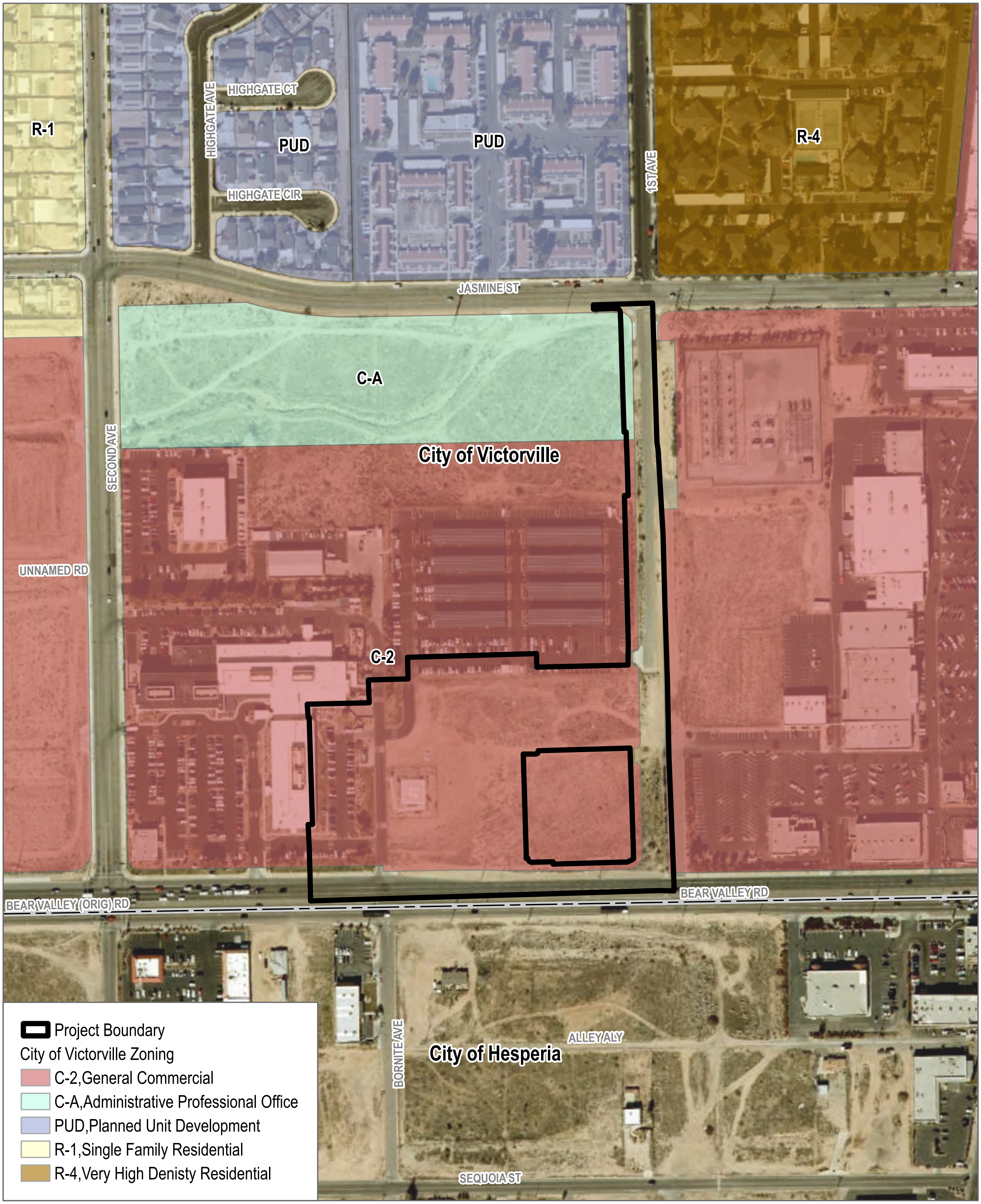

SOURCE: Esri World Imagery Basemap; San Bernadino County 2024; City of Victorville 2024

FIGURE 5

Zoning Designations

Desert Valley Prime Hospital Project

0 150 300 Feet

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Project Boundary
Biological Study Area (100' Buffer)
Impacts
Development Footprint (Permanent)
Off-Site Improvements (Permanent)

Vegetation Communities and Land Cover Types
Fourwing saltbush (*Atriplex canescens*) Association
Rubber rabbitbrush (*Ericameria nauseosa*) Association
Creosote bush (*Larrea tridentata*) Association
Disturbed Habitat
Urban/Developed

Inactive Suitable Burrow
Western Joshua tree (*Yucca brevifolia*) Observations
Size A (< 1 m) (n=1)
Size B (> 1 m and < 5m) (n=5)
Size C (> 5m) (n=0)

SOURCE: Esri World Imagery Basemap; San Bernadino County 2024

DUDEK

0 115 230 Feet

FIGURE 6

Impacts to Biological Resources

Desert Valley Prime Hospital Project

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FIGURE 7

Noise Measurement and Modeled Noise Contours

Desert Valley Hospital Project

DUDEK

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Appendix A

Air Quality, Greenhouse Gas Emissions, and Energy Calculations

Appendix B

Health Risk Assessment Calculations

Appendix C

Biological Technical Report

Appendix D
Cultural Resources Technical Report

Appendix E
Geotechnical Engineering Report

Appendix F
Hydrology Report

Appendix G

Water Quality Management Plan

Appendix H.1

Noise Technical Report

Appendix H.2
Helipad Noise Analyses

Appendix I

Traffic Study Report

Appendix J
Will Serve Letter