

Victorville Fleet Service Center Fuel Tank Infrastructure

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION ADDENDUM

County of San Bernardino

Prepared for:

**COUNTY OF SAN BERNARDINO
FLEET MANAGEMENT DEPARTMENT
AND
REAL ESTATE SERVICES DEPARTMENT**
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1 INTRODUCTION

This document constitutes Addendum 1 to the August 2017 Final Initial Study/ Mitigated Negative Declaration (2017 Adopted IS/MND) prepared for the Victorville Fleet Service Center Project (hereafter referred to as the Adopted Project) located 15000 Tokay Street, Victorville. The County of San Bernardino Fleet Services Department is the lead agency under the California Environmental Quality Act (CEQA).

The IS/MND was adopted by the County of San Bernardino in August 2017 (State Clearinghouse Number 2017061029). The Project was to construct a 23,643 square foot fleet services center on 4.8 acres east of the intersection of Tokay Street and Cottonwood Avenue in the City of Victorville, San Bernardino County, California. The facility plans included an infiltration basin along the northern portion of the site, and a 34-stall parking lot along the southern portion of the site. The site would be completely paved except for the earthen stormwater infiltration basin along the northern portion of the site. The facility was constructed in 2019.

The County now desires to add fuel infrastructure to create a fueling center within the property boundaries of the Victorville Fleet Service Center (herein referred to as Proposed Project Modification, refer to Figure 1).

The proposed fuel infrastructure consists of two 10,000 above-ground fuel tanks (one unleaded and one diesel), and associated piping, valves, and tank maintenance infrastructure. The tanks will be placed in the parking lot, just northeast of the site entrance, approximately 100 feet south of the main building. Stormwater and containment include placing the tanks in an area that will be graded at parking lot existing grade with the containment above existing finished surface of the parking lot. A concrete containment pad will be placed under the tanks for secondary containment. To facilitate installation and internal circulation around the fuel infrastructure, 12 existing parking stalls will be removed in the vicinity of the proposed tanks. A total of 70 were installed although 34 were originally identified to be installed/needed for the fleet services project.

The purpose of offering fuel service at the Victorville Fleet Service Center is to not only have fuel service for the Department vehicles that have been serviced at the facility but offer a fueling opportunity for other San Bernardino County vehicles working in the region. A fuel station is available at the Baldy Mesa Rd-Sycamore Yard, 4 miles west of the I-15, which is restricted for limited County use during business hours Monday through Friday and does not serve the I-15 corridor directly. The new fuel infrastructure to be located at the Victorville Fleet Service Center will provide fuel service to County vehicles 24 hours per day, 7 days per week, and any county vehicle can fuel at this location and is more accessible from the I-15 - only approximately 0.5-mile from the I-15.

The fundamental conclusion of this Addendum is that the Proposed Project Modification will not result in new significant impacts nor substantially increase the severity of previously disclosed impacts beyond those already identified in the original Project. Thus, a subsequent or supplemental Negative Declaration need not be prepared or publicly circulated.

2 CEQA FRAMEWORK

Because the environmental effects of installing a fueling center were not assessed in the original MND adopted by the County in 2017, the County now desires to analyze the potential impacts of the Proposed Project Modification through the CEQA process.

Additionally, there have been revisions to the CEQA Guidelines (Pub. Resources Code section 21000, et seq.) since the adoption of the 2017 MND.

2.1 Guidelines Section 15162 – Initial Study/MND Amendment or Subsequent Document

CEQA Guidelines Section 15162 states that when a negative declaration has been adopted for a project, no subsequent negative declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

The guidelines further state that if changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent negative declaration if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

2.2 Guidelines Section 15164 – Initial Study/MND Addendum

CEQA Guidelines Section 15164 sets out the conditions in which an adopted MND can be revised or addenda added:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

- (d) *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
- (e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

2.3 Decision to Prepare an IS/MND Addendum

An Initial Study Addendum is the appropriate document to address the Proposed Project Modification using the following consideration:

- Section 15162 identifies that an Addendum can be prepared and is not required to be circulated for public review if there are no new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- *Friends of the College of San Mateo Gardens v. San Mateo Community College District, et al.* (1st Dist., Div. 1, 2017) 11 Cal.App.5th 596, May 5, 2017. This case determined that:

[W]hen a project is initially approved by negative declaration, a major revision to the initial negative declaration will necessarily be required if the proposed modification may produce a significant environmental effect that had not previously been studied. ... Indeed, if the project modification introduces previously unstudied and potentially significant environmental effects that cannot be avoided or mitigated through further revisions to the project plans, then the appropriate environmental document would no longer be a negative declaration at all, but an EIR.”

Although the fuel infrastructure was not originally addressed in the 2017 IS/MND and the CEQA Guidelines have changed since the preparation of the 2017 IS/MND, the County considered the potential environmental impacts of its Proposed Project Modification during design and employed various engineering measures to ensure that there would be no significant environmental effect of adding fuel center operations within the existing facility beyond those impacts already identified for the Victorville Fleet Service Center project.

The fuel center will be placed within the existing footprint of the original Adopted Project and no substantial modifications to the site are required to install the fuel tanks and related structures. The proposed fuel tank location is already graded and partially paved with parking spaces. Therefore, there does not appear to be any new mitigation required to install the fuel tanks within the existing facility footprint.

Secondly, fuel tanks are heavily regulated, and the County will be obtaining and abiding by all regulatory requirements for installation and operations. Therefore, there does not appear to be any new mitigation required to install the fuel tanks within the existing facility footprint.

A desktop evaluation of the revisions to the 2019 checklist, compared to the 2017 checklist, also identified that there were no new evaluation criteria that would require mitigation when considering the original project, or the Proposed Project Modification. Therefore, preparation of an Addendum to address the evaluation criteria applicable to the Proposed Project Modification and the new 2019 CEQA Checklist sections, was determined to be adequate by the County.

2.4 Use of 2019 CEQA Guidelines

The 2017 CEQA Guidelines were used to analyze the Adopted Project. Since that time, the California Natural Resources Agency (the “Natural Resources Agency”) amended the CEQA Guidelines effective in 2018 and 2019.

The amendments addressed legislative changes to the California Environmental Quality Act (CEQA), clarified certain portions of the existing CEQA Guidelines, and updated the CEQA Guidelines to be consistent with recent court decisions.

The following changes to the 2019 CEQA Guidelines include:

- Added sections: 15064.3 (transportation) and 15234 (remand procedures).
- Amended sections: 15004, 15051, 15061, 15062, 15063, 15064, 15064.4, 15064.7, 15072, 15075, 15082, 15086, 15087, 15088, 15094, 15107, 15124, 15125, 15126.2, 15126.4, 15152, 15155, 15168, 15182, 15222, 15269, 15301, 15357, 15370, and Appendix G, Appendix M and Appendix N.

As a result of the revised Guidelines, the CEQA Checklist, located in Appendix G of the Guidelines and used to analyze Project impacts, was revised. Many checklist sections underwent minor modifications and clarifications to incorporate the revised CEQA statute revisions. However, two new checklist sections were added – “Energy” and “Wildfire” – in 2019.

Another legislative change that occurred was with respect to Traffic/Transportation. Section 15064.3 of the CEQA Guidelines was added to switch from Level of Service (LOS) to Vehicle Miles Traveled (VMT) as metric for transportation impact analysis. San Bernardino County’s July 2019 Traffic Impact Study Guidelines, developed to identify VMT methodology, states that “For purposes of SB 743 compliance, a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic Division and would apply to projects that have the potential to increase the average VMT per person or employee.”

The original project IS/MND was prepared utilizing the 2017 CEQA Appendix G Checklist. Because the Proposed Project Modification to the Victorville Fleet Service Center Project are not considered substantive that would trigger significant additional environmental review, this Addendum will assess the Proposed Project Modification using the 2019 Guidelines for only the specific criteria which are applicable to the Proposed Project Modification. Additionally, assessments for the new CEQA Checklist sections for Energy and Wildfire are added for completeness.

3 PROJECT DESCRIPTION

3.1 Original Project Design

The County of San Bernardino currently provides fleet maintenance services at 17130 Mesa Street, Hesperia, CA 92345 and at other dispersed locations throughout the High Desert area. Planning for a new, modern facility that consolidates these services at a centralized location within the service area has been underway for approximately 3.5 years. The Victorville Fleet Service Center at 15000 Tokay Street in the City of Victorville, constructed in 2019 in accordance with the Adopted Project, results in an approximate 0.5-mile reduction in average trip length for on-site employees and fleet vehicles as compared with the current site located 4 miles to the east in the City of Hesperia.

The Adopted Project identified construction of a 23,643 square foot (sq. ft.) fleet services building on 4.8 acres located northeast of Tokay Street, east of the intersection of Tokay Street and Cottonwood Avenue in the City of Victorville, San Bernardino, California. The 4.8-acre building site was proposed and constructed within a northerly 5.05-acre lot created by lot line adjustment to APN 3093- 251-01 (8.75 acres).

In addition to the fleet services building, the County proposed and constructed an infiltration basin along the northern portion of the site, and a 34-stall parking lot along the southern portion of the site. When the Victorville Fleet Services center was constructed, a total of 70 parking stalls were installed.

Since construction, as identified in the Adopted Project, the Proposed Project employs seven full-time employees during normal working hours. In addition to employees commuting to the services center, there are an estimated 25 fleet vehicle visits to the site daily. The fleet consists of approximately 70 percent light duty vehicles (such as automobiles and small trucks) and approximately 30 percent heavy duty vehicles (large trucks). Vehicles would access the site from Tokay Street, via Cottonwood Avenue via Bear Valley Road; and Tokay Street, via Cottonwood Avenue via Mariposa Road via Nisqualli Road. A cul-de-sac for vehicle turn-arounds has been constructed at the Tokay Street access to the site, consistent with the Adopted Project.

3.2 Proposed Project Modification

The proposed fuel infrastructure generally consists of two, 10,000 gallon above-ground fuel tanks (one unleaded and one diesel), and associated piping, valves, and tank maintenance infrastructure to be installed within existing areas in the Victorville Fleet Service Center parking lot. One fuel dispenser will be connected to each of the above-ground tanks. The tanks will be placed at the southernmost end of the property, immediately adjacent to and outside of the existing paved area.

It is anticipated that the fueling portion of the site will receive approximately 10 cars per day, seven days per week, or approximately 200 vehicles per month.

The fuel tanks are kept at a 50 percent capacity minimum, and it is anticipated that filling activities will occur approximately twice per month by a contract fueling service.

Stormwater detention and containment includes placing the tanks in an area that will be graded approximately 2 feet lower than the adjacent parking lot. A concrete containment pad will be placed under the tanks for secondary containment.

The Proposed Project Modification includes the removal of 12 existing parking stalls to facilitate site circulation with the new tanks/pumps. The Adopted Project included a total of 34 parking stalls, needed for the Project, however, a total of 70 were installed as incidental overflow. As such, the loss of 12 stalls of the 70 existing stalls, for a total of 58 availing remaining stalls, shall not interfere with the normal operations of the existing building.

The Proposed Project Modification also includes the installation of underground communication cable between the diesel tanks and a new 60 kW diesel generator with a level 2 enclosure that will be installed near the main building. An Emergency Power Off (EPO) switch will also be provided.

Stormwater/Overflow Containment Operations

A Spill Prevention Control and Countermeasure Plan (SPCCP) will be created during the construction process and administered by the County. Permitting and the County Fire Business Emergency Plan under Aboveground Petroleum Storage Act (APSA) will be developed prior to completion of construction on the Fuel tanks. The stormwater containment will be addressed in the Business Plan and SPCC plan.

Fueling Center – Site Circulation

Vehicles utilizing the fueling facilities will enter the site from Tokay Street, and turn east directly to the pumps, which are situated for easy access. Once fueling is complete, vehicles will continue east, along the parking

isle, turn south, and west, and proceed to the Tokay Street entrance to exit. The circulation is designed to facilitate a free flow of traffic and high visibility for users of the fuel infrastructure.

The driveway approach entry from Tokay Street is 35 feet wide. The drive aisle in front of the fueling facility is 24 feet wide, which is the minimum width for two-way vehicular traffic. The easterly drive aisle as vehicle navigate pass the fueling facility is 24 feet wide also. As vehicles turn west toward the driveway approach on Tokay Street, the drive aisle is 53 feet wide.

Permits Required

Permits are acquired after award of construction and prior to completion of construction for the above-ground fuel tanks and the generator.

Construction Scenario

Construction is expected to occur in the Spring/Summer 2021 and last approximately 180 days.

A 990 square foot area will be excavated 16 inches from tank pad elevation for fuel tank concrete pavement to establish subgrade. Approximately 60 cubic yards of soil will be either reused on site or exported as part of the excavation of for the tank concrete pad. Any existing asphalt pavement adjacent to the fueling facilities shall be demolished and hauled away.

The concrete pad and containment berm will be constructed per plan. Installation of the fuel tanks, fuel dispensers and tank accessories shall be per plan. The proposed location of demolished asphalt pavement shall be reconstructed with concrete pavement per plan. The generator concrete pad shall be constructed per plan.

The communication conduit will be constructed approximately 4 feet deep and 2 feet wide.

Best Management Practices

The San Bernardino County Flood Control District (SBCFCD) requires Permittees and their contractors to implement a program to effectively control water pollution during all Permit construction projects. The Department, as part of the County of San Bernardino, will implement construction best management practices including but not limited to:

- SE-6 Gravel bag Barrier
- TC-1 Stabilized Construction Entrance
- SC-7 Street Sweeping
- WM-2 Stockpile Management
- WM-8 Concrete Waste Management
- WM-9 Sanitary/Septic Waste Management
- SE-10 Storm Drain Inlet Protection

4 ENVIRONMENTAL ANALYSIS

The following analysis identifies the 2017 criteria in which the Project was originally evaluated, and the subject areas that are relevant to this project, as well as identifies that two new sections based on the 2019 Guidelines

Amendments to the 2017 Adopted IS/MND would apply to the following sections:

- 4.1 Air Quality
- 4.7 Greenhouse Gas Emissions
- 4.8 Hazards and Hazardous Materials
- 4.17 Transportation and Traffic
- 4.21 Energy (New Section for 2019 Guidelines Compliance)
- 4.22 Wildfire (New Section for 2019 Guidelines Compliance)
- 4.23 Mandatory Findings of Significance (this is section 4.20 in the Initial Study, numbering revised to include analysis for Energy and Wildfire)

The following analysis for the applicable topics is based on only those criteria where a “Less Than Significant” finding was made. All findings of “No Impact” were considered not applicable to the facility in the 2017 Adopted IS/MND, and therefore, not applicable to the proposed amended project, unless otherwise noted in the below analysis.

4.1 Air Quality

The following criteria were identified as having impacts that were **Less Than Significant** in the 2017 Adopted IS/MND:

- b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*
- c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*
- d) Would the project expose sensitive receptors to substantial pollutant concentrations?*
- e) Would the project create objectionable odors affecting a substantial number of people?*

Applicable 2019 Guidelines Checklist Criteria:

- 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?*

Discussion

The 2017 Adopted IS/MND identified (Table 4.3-1 *Construction Emissions Summary* and Table 4.3-2 *Operational Emissions Summary*) that the construction and operations of the facility were well below the MDAQMD thresholds but did not include the addition of fueling infrastructure. Therefore, the Victorville Fleet Service Center facility construction and operation emissions were found to be less than significant for criteria (a) and (b). For reference, Tables 4.3-1 and 4.3-2 from the 2017 Adopted IS are provided below:

Table 4.3-1 Construction Emissions Summary

Year	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2017	5.07	69.16	24.69	0.12	10.07	6.56
Maximum Daily Emissions	5.07	69.16	24.69	0.12	10.07	6.56
MDAQMD Regional Threshold	137	137	548	137	82	82
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Urban Crossroads 2017a

Table 4.3-2 Operational Emissions Summary

Operational Activities (Summer Scenario)	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	0.68	6.00E-05	6.51E-03	0.00	2.00E-05	2.00E-05
Energy Source	0.02	0.20	0.17	1.21E-03	0.02	0.02
Mobile	0.18	3.65	1.11	6.42E-03	0.16	0.05
Total Maximum Daily Emissions	0.88	3.85	1.29	0.01	0.18	0.07
MDAQMD Regional Threshold	137	137	548	137	82	82
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Operational Activities (Winter Scenario)	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	0.68	6.00E-05	6.51E-03	0.00	2.00E-05	2.00E-05
Energy Source	0.02	0.20	0.17	1.21E-03	0.02	0.02
Mobile	0.19	3.60	1.24	6.04E-03	0.16	0.05
Total Maximum Daily Emissions	0.89	3.80	1.42	0.01	0.18	0.07
MDAQMD Regional Threshold	137	137	548	137	82	82
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Urban Crossroads 2017a

Relative to sensitive receptors, criterion (c), a charter school extension program for Victor Valley Unified High School District operates out of a commercial unit within the shopping center, at 15048 Bear Valley Road, approximately 500 feet southwest of the project site. Activities are conducted within the building unit, which is further shielded from the project site by other commercial units within the shopping center. Therefore, this school facility is not considered a sensitive receptor. The Victorville Fleet Service Center construction and operations were well below the MDAQMD significance thresholds therefore, sensitive receptors would not be subject to a significant air quality impact during construction or operational activities of the Adopted Project.

Relative to odors, criterion (d), the construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and were considered less than significant.

Analysis of Proposed Project Modification

Summary Finding: Less Than Significant.

- b) Less Than Significant. As identified in the 2017 Adopted IS/MND, construction and operations of the Victorville Fleet Service Center facility was found to be well below the thresholds of the MDAQMD standards. Construction and operations of the fuel tanks in an approximate 1,000-square-foot area

within the existing Facility footprint is anticipated be minimal, temporary and not exceed the MDAQMD thresholds because the proposed footprint is small, and emissions for the entire Victorville Fleet Service Center construction and operations were so well below the thresholds.

- c) Less Than Significant. The 2017 Adopted IS/MND identified that a charter school extension program operates out of a commercial unit within a shopping center approximately 500 feet southwest of the project site. Currently a day care is within the shopping center. However, because activities are conducted within the building unit, which is further shielded from the project site by other commercial units within the shopping center, the school facility is not considered a sensitive receptor. Therefore, the less than significant finding of the 2017 Adopted IS/MND for the Victorville Fleet Service Center facility also applies to the Amended Project.
- d) Less Than Significant. Odor from the fuel tanks is anticipated to be negligible as the tanks will be self-contained. The fuel nozzles will also conform to California standards as to not produce noxious odors. The Facility employs less than 15 employees, and there are no adjacent sensitive receptors. Therefore, any odor generated from the fuel facilities is not anticipated to adversely affect a substantial number of people. Therefore, there is a less than significant impact.

4.7 Greenhouse Gas Emissions

The following criteria were identified as having impacts that were **Less Than Significant** in the 2017 Adopted IS/MND:

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Applicable 2019 Guidelines Checklist Criteria:

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Discussion

As stated in the 2017 Adopted IS/MND, the County of San Bernardino adopted the Greenhouse Gas Reduction Plan (GHG Plan) in September 2011, which provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino. The County includes a GHG Development Review Process that specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 metric tons (MT) of carbon dioxide equivalents (CO₂e) per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MT of CO₂e per year would be required to either achieve a minimum 100 points per the Screening Tables or a 31 percent reduction over 2007 emissions levels.

The Facility was estimated to result in approximately 276.94 MT of CO₂e per year, which is well below the screening threshold of 3,000 MT of CO₂e per year; therefore, impacts from the Facility would be less than

significant. Table 4.7-1 “Project-Related Greenhouse Gas Emissions” from the 2017 Adopted IS/MND is below for reference:

Table 4.7-1 Project-Related Greenhouse Gas Emissions

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	10.18	1.77E-03	--	10.22
Area	1.12E-03	0.00E+00	0.00	1.20E-03
Energy	99.48	0.00	1.43E-03	100.01
Mobile Sources	107.94	1.00E-02	0	108.26
Waste	18.33	1.08	0.00	45.41
Water Usage	11.02	0.07	0.00	13.04
Total CO₂e (All Sources)	276.94			
Screening Threshold	3,000			
Significant?	NO			

Source: Urban Crossroads 2017b, Appendix B

The 2017 Adopted IS also identified that the Facility does not interfere with the state’s implementation of (i) Executive Order B-30- 15 and SB 32’s target of reducing statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05’s target of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the state’s implementation of GHG reduction plans described in the CARB’s Updated Scoping Plan, including the state providing for 12,000 megawatts of renewable distributed generation by 2020, the California Building Commission mandating net zero energy homes in the building code after 2020, or existing building retrofits under AB 758. Therefore, the Proposed Project’s impacts on greenhouse gas emissions in the 2030 and 2050 horizon years are less than significant.

Analysis of Proposed Project Modification

The Proposed Project Modification seeks to reduce vehicle miles traveled (VMT) for County vehicles to utilize a fueling center. A fuel station is available at the Baldy Mesa Rd-Sycamore Yard which is restricted for limited County use during business hours Monday through Friday but does not serve the I-15 corridor directly as it is 20 miles west of the major Desert Service area. The new Fuel Station to be located at the Victorville Fleet Service Center will provide fuel service to County vehicles 24 hours per day, 7 days per week, and any county vehicle can fuel at this location and centrally located and accessible to the I-15 Freeway compared to the existing use.

The fueling hoses will be fitted with boots that meet California standards. All vapor recovery systems must undergo certification tests to demonstrate compliance with performance standards before they can be sold, offered for sale, or installed in California.

The California Air Resources Board (CARB) also has established greenhouse gas factors for gasoline dispensing facilities¹.

¹ California Air Resources Board, Monitoring and Laboratory Division, *Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities*, December 23, 2013.

Summary Finding: Less Than Significant.

- a) Less Than Significant. The 2017 Adopted IS/MND analyzed mobile sources as part of the Greenhouse Gas Analysis, although fuel facilities and the additional traffic generated by installing the fuel facilities were not specifically analyzed. However, given that the Project will offer a shorter trip distance for County employees to fuel vehicles, and that the Project's greenhouse gas emissions were so far below the threshold, the addition of two fueling stations and the additional traffic at the site, will also not exceed standards.
- b) Less Than Significant. The 2017 Adopted IS identified that the Victorville Fleet Service Center did not interfere with any state order relative to GHG Emissions. Therefore, because the fuel tanks and related infrastructure are minor additions, the Project modifications will also not interfere with any state order relative to GHG emissions. Therefore, the proposed Project's modification impacts on greenhouse gas emissions in the 2030 and 2050 horizon years are less than significant.

4.8 Hazards and Hazardous Materials

The following criteria were identified as having impacts that were **Less Than Significant** in the 2017 Adopted IS/MND:

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- 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?*
- 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?*
- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*
-
-
- g) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Applicable 2019 Guidelines Checklist Criteria:

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

- 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?*
- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*
- 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) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- g) *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Discussion

The 2017 Adopted IS/MND identified that the Victorville Fleet Service Center facility would not store on-site fuels, but that all transport, handling, use, and disposal of substances such as petroleum products, paints, and solvents related to the operation and maintenance of the Proposed Project would comply with all federal, state, and local laws regulating the management and use of hazardous materials.

The Victorville Fleet Service Center facility is also not located on a hazardous materials site, and both a Phase 1 and Phase 2 Environmental Site Assessment were conducted which yielded negative results.

Regarding criterion (c), the 2017 Adopted IS/MND identified that a small public charter school extension operates out of a commercial unit within the shopping center along Bear Valley Road approximately 500 feet south of the project site. There are no other schools within one-quarter mile of the project site. As discussed in the responses to questions 4.8.2 a) and b), impacts from the use, storage, and disposal of hazardous materials typically associated with the construction and operation of the proposed Victorville Fleet Service Center facility would be less than significant and was not expected to affect any schools.

Relative to criterion (f) The Victorville Fleet Service Center project included street improvements and utility connections that would require construction to occur within adjacent streets. The construction of the Victorville Fleet Service Center would result in temporary construction truck traffic, which had the potential to interfere with emergency response access to areas near the project site. There were no commercial uses that take primary access from Tokay Street in the project vicinity. Delivery trucks access the shopping center southwest of the project site via Tokay Street. Impacts were identified to be less than significant.

Analysis of Proposed Project Modification

Summary Finding: Less Than Significant.

- a) **Less Than Significant.** The Project modification proposes a fuel station which will receive routine fuel deliveries as needed. It is the County's policy to keep the fuel tanks at a minimum of 50 percent capacity at all times, and all fuel tanks in the County typically receive deliveries approximately twice per month, as needed to maintain a safe level of supply in the tanks. The County only utilizes permitted

and licensed fuel dispensary contractors. Additionally, all infrastructure would be regulated and permitted and inspected in accordance with all federal and state regulations.

- b) Less Than Significant. The State Water Resource Control Board – Above ground Petroleum Storage Act requires that the County develop a Spill Prevention Control and Countermeasure Plan (SPCCP) in accordance with the requirements of Title 40, Code of Federal Regulations, Part 112. This plan regulates oil and hazardous substance pollution prevention to non-transportation operations at the facility, which contains aboveground diesel fuel storage tanks. The facility will be operated in accordance with all local, State and federal regulations; therefore, the impact is less than significant.
- c) Less Than Significant. The 2017 Adopted IS identified that a public charter school extension operated out of a commercial unit within the shopping center along Bear Valley Road approximately 500 feet south of the Project site. However, site reconnaissance indicates that this school is no longer operating out of this shopping center. A family day center, however, does exist in the shopping center. While this is a sensitive receptor, it does not qualify as a school under this criterion. As discussed in responses to criterion a) and b), the fuel facility will be constructed and operated consistent with all local, State and federal regulations. Therefore, there will be a less than significant impact.
- d) Less Than Significant. A Phase I Environmental Site Assessment (ESA) was completed for the Victorville Fleet Service Center as part of the 2017 Adopted IS/MND². The ESA included a regulatory agency database search which produced one off-site area of concern approximately 540 feet southwest of the project site. This facility, a dry-cleaning business, was listed as a small quantity hazardous waste generator with no violations. Due to the distance from the project site, and no reported releases from this facility, the Phase I ESA concluded that the facility was not likely to have affected soil, soil vapor, or groundwater beneath the project site, and is not a Recognized Environmental Condition (REC). Another site, an apartment located west of the project site was identified in the Clandestine Drug Lab database. However, due to the distance from the Project site, it was determined that this facility did not pose an environmental concern to the Project site.

The Project Modifications are located on the same property that was subject to the Phase I ESA, therefore, the findings of a less than significant impact for the Victorville Fleet Service Center are applicable to the Project Modifications.

For this Addendum, the State Water Resources Control Board database, Geotracker, was reviewed on October 16, 2020. The result also was negative for any facility that would impact the soil, soil vapor or groundwater beneath the Victorville Fleet Service Center facility. Therefore, there is a less than significant impact.

- e) No Impact. There is no airport public or private, within two miles of the Victorville Fleet Service Center, or the fuel infrastructure within the Victorville Fleet Service Center. The closest airport to the project site is Hesperia Airport located approximately 6.5 miles to the southeast. Given the distance of the project site to the airport there would be no safety hazards for people residing or working in the project area. No impact would occur.
- f) Less Than Significant. Construction of the Project Modifications would occur with the Victorville Fleet Service Center, and no work on adjacent streets is necessary. Heavy equipment and the tanks would be delivered to the site, which has good access from Tokay Street directly to the fuel site location. The emergency access plan for the Victorville Fleet Service Center would also not be

² Kleinfelder, 2016. *Phase I Environmental Site Assessment Portion of Assessor's Parcel Number 3093-251-01 Victorville, California* Kleinfelder. Project No. 20172135.001a.

impacted because the Facility has a large parking area as well as clear access to Tokay Street. Therefore, impacts would be less than significant.

- g) No Impact. The Victorville Fleet Service Center, and the proposed fuel facility within the property boundaries of the facility, is located in a developed, commercially zoned area within the City of Victorville, in the southwestern part of County of San Bernardino. There are no wildlands in the vicinity. No impact would occur.

4.17 Transportation and Traffic

The following criteria were identified as having impacts that were **Less Than Significant** in the 2017 Adopted IS/MND:

- a) *Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?*
- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

....

....

- e) *Would the project result in inadequate emergency access?*

Applicable 2019 Guidelines Checklist Criteria:

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- b) *Would the project conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*
- 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)?*
- d) *Would the project result in inadequate emergency access?*

Discussion

The Victorville Fleet Service Center is accessed from 1) Tokay Street via Cottonwood Avenue and Bear Valley Road, and 2) Tokay Street via Cottonwood Avenue, Mariposa Road, and Nisqualli Road. Bear Valley Road is a six-lane, east-west arterial and truck route through the City of Victorville. Regional facilities include I-15, approximately 0.4 mile to the west of the project site, and State Route 18, approximately two miles to the north.

The 2017 Adopted IS identified that the Victorville Fleet Service Center would employ seven full-time employees during normal working hours that would generate 14 daily trips (to and from the site). It was estimated that approximately 25 fleet vehicles would visit the facility daily generating a total of 50 daily trips. The facility would generate an estimated total of 64 daily vehicle trips. These estimated 64 daily trips would not be new trips added to the local transportation network; instead, they are a redistribution of existing trips because the Victorville Fleet Service Center would replace an existing facility in the City of Hesperia.

The County estimates that approximately 10 vehicles per day would visit the new fuel facilities, generating a total of 20 roundtrips per day. A fuel station is available at the Baldy Mesa Rd-Sycamore Yard which is restricted for limited County use during business hours Monday through Friday but does not serve the I-15 corridor directly as it is 20 miles west of the major Desert Service area. Adding the fuel facilities to the Victorville Fleet Service Center is an effort to reduce overall trips by County employees by offering a fueling opportunity closer to the I-15 corridor.

Senate Bill 743 (SB 743), signed by the Governor in 2013, changed the metrics for identifying transportation as a CEQA impact. The Final guidelines were released in December 2018 and has identified vehicle miles of travel (VMT) as the preferred metric moving forward. San Bernardino County's July 2019 Traffic Impact Study Guidelines, amended to identify the County's VMT methodology, states: "For purposes of SB 743 compliance, a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic Division and would apply to projects that have the potential to increase the average VMT per person or employee."

Additionally, the County guidelines state, "Projects which serve the local community and have the potential to reduce VMT should not be required to complete a VMT assessment." The County identifies that "Local serving gas stations" are exempted from preparing a VMT assessment.

Analysis of Proposed Project Modification

Summary Finding: Less Than Significant.

- a) No Impact. The findings in 2017 Adopted IS/MND addressed this criterion and found No Impact because there are no bicycle, bus stops or public transit facilities near the project site on Tokay Street. The closest bus stop is located on Cottonwood Avenue south of Tokay Street. Because the proposed fuel facilities are located within the Victorville Fleet Service Center, the Proposed Project Modifications would also not create conflicts with adopted policies, plans or programs supporting alternative transportation. No impact would occur.
- b) Less Than Significant Impact. The purpose of the fuel center at the Victorville Fleet Service Center is to reduce trips for County employees who must travel an additional 20 miles from the I-15 corridor for fueling. The County's July 2019 Traffic Impact Study Guidelines also exempt "local-serving gas stations" from preparing a VMT analysis. Therefore, the Proposed Project Modifications are consistent with CEQA Guidelines § 15064.3, subdivision (b), and there is a less than significant impact.
- c) No Impact. The findings in 2017 Adopted IS/MND addressed this criterion and found No Impact because the Victorville Fleet Service Center would be located at the end of Tokay Street, which was developed with curb and gutter to the City of Victorville standards. The proposed fuel facilities will be located within the Victorville Fleet Service Center, and no additional improvements to Tokay Street or the roadway system are needed. Therefore, Proposed Project modifications will not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and there is no impact.

- d) Less Than Significant. The 2017 Adopted Initial Study identified that Tokay Street, in the Project area, does not serve as a primary access street to commercial properties. The Proposed Project Modifications will be constructed within the existing Fuel Service Center. Construction of the Proposed Project Modifications would utilize Tokay Avenue to transport the fuel tanks and equipment and may result in temporary construction truck traffic along roadways in the Proposed Project Modification area; however, access to areas near the Proposed Project Modification would be maintained during construction. The fuel facilities will be installed along the southern property boundary, approximately 100 feet east of the facility entrance off Tokay Street. There may be temporary lane width restrictions in the site entry and exit as equipment is delivered and moved into place. However, due to the nature of the Victorville Fleet Service Center needing to be available for vehicles at all times, and the fact that the site entrance is approximately 50 feet wide, this temporary lane width restriction would be less than significant.

4.21 Energy

2017 Guidelines Checklist Criteria:

Evaluating a Project's energy usage was not a criterion in the 2017 Adopted IS/MND. A discussion of the Project's energy usage and energy conservation measures were factored into the modeling conducted for the Air Quality and Greenhouse Gas analysis in the 2017 Adopted IS/MND.

2019 Guidelines Checklist Criteria:

VI. Energy

- a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b) Would the project Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Discussion

The Proposed Project Modification include installing fuel tanks. Electricity will be used for fuel tank facilities such as gages, controls, emergency shut-off. A diesel-powered generator will also be used as a backup to ensure the tank infrastructure and controls function in the event of a power failure.

Analysis of Proposed Project Modification

Summary Finding: Less Than Significant.

- a) Less Than Significant. Energy use during construction of the Proposed Project Modifications would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In the interest of cost efficiency, construction contractors are not anticipated to utilize fuel in a manner that is wasteful or unnecessary. Therefore, Project Modification construction would not result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and no construction-related energy impact would occur. Operationally, the electricity would only be used for the gauges and safety controls, which are low voltage and consume very little electricity. Therefore, there is a less than significant impact.

- b) Less Than Significant. SB 100 mandates 100 percent clean electricity for California by 2045. SCE has achieved over 46 percent Carbon-Free energy sources as of its 2018 Suitability Report. Because construction of the Proposed Project Modifications would be powered by the existing electricity grid (SCE), the Proposed Project Modification would also be powered by current renewable energy available in the grid, and therefore, would not conflict with SB 100. Nonetheless, the project would not conflict with or obstruct the State plan for renewable energy; therefore, no impact would occur.

4.22 Wildfire

The potential for wildfire was addressed in the 2017 Adopted IS/MND under Checklist Section VIII (h), *Hazards and Hazardous Materials*. The 2019 Guidelines revised the same criteria in the *Hazards and Hazardous Materials* section as well as created *Section XX Wildfire*, along with two new criteria for Section XX.

The following criteria that addressed Wildfire impacts was assessed in the 2017 Adopted IS/MND:

Section VIII – Hazardous and Hazardous Materials

- h) *Would the project the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized residences are intermixed with wildlands?*

2019 Guidelines Checklist Criteria:

Section IX - Hazardous and Hazardous Materials:

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

Section 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 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?*

Discussion

The 2017 Initial Study for the Victorville Fleet Service Center identified that there was No Impact to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized residences

are intermixed with wildlands because Victorville Fleet Service Center is located in a developed, commercially zoned area within the City of Victorville, in the southwestern part of County of San Bernardino. There are no wildlands in the vicinity. No impact would occur.

The Proposed Project Modifications will be located within the grounds of the Victorville Fleet Service Center.

Analysis of Proposed Project Modification

Summary Finding: No Impact.

Installation of fuel infrastructure to create a fuel center in the existing site footprint have no new impacts beyond what was identified for the construction and operation of the overall site. The Victorville Fleet Service Center, and the fuel services to be located within the Victorville Fleet Service Center, are not located or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, there is no impact to any of the criteria in this section.

4.23 Mandatory Findings of Significance

The 2019 Guidelines criteria for the Mandatory Findings of Significance did not change from the 2017 Adopted IS.

Mitigation measures were identified for the Victorville Fleet Service Center to minimize impacts during construction because it was to be constructed on vacant, native land.

The Proposed Project Modification will be constructed within an existing developed area within the Victorville Fleet Service Center. An analysis of the Proposed Project Modifications identified no new mitigation measures are necessary beyond what was already identified for the Victorville Fleet Service Center construction.

And though the CEQA Guidelines have been revised since the adoption of the 2017 Initial Study prepared for the Victorville Fleet Service Center, this Addendum assessed the Proposed Project Modification in the categories relevant for this project type and also identified that no new mitigation is necessary or warranted.

Therefore, there are no new impacts to the Proposed Project Modification that would require additional CEQA assessments or filings.

FIGURES
