



Item Number: {{item.number}}

Planning Commission

PUBLIC HEARINGS

Meeting of: May 14, 2025

Submitted By:

Travis Clark, Senior Planner

Case:

PLAN23-00018

Subject:

A Site Plan with a California Environmental Quality Act Section 15183 determination to allow for the development of an approximately 231,500 square foot pet treat manufacturing facility on 10 acres of undeveloped property zoned M-2 (Heavy Industrial).

Applicant:

Victorville Real Estate Investment, LLC (American Jerky Company)

Location:

Generally located at the southeast corner of Hesperia Road and Nisqualli Road.

Recommendation:

Staff recommends that the Planning Commission conduct a public hearing, receive testimony regarding the proposed project and take the following actions:

- 1. Environmental Assessment** – Find the project consistent with the City's General Plan Program Environmental Impact Report and exempt from additional environmental review per Section 15183 of the California Environmental Quality Act (CEQA) entitled "Projects Consistent with a Community Plan, General Plan, or Zoning"; and
- 2. Site Plan** – Adopt Resolution No. P-25-014, approving Site Plan Case No. PLAN23-00018, subject to the attached conditions of approval.

Summary:

The applicant is requesting approval of this proposal to allow for the development of an approximately 231,500 square foot industrial dog treat manufacturing facility, comprised of 211,860 sq. ft. allocated to warehouse and manufacturing space and 19,588 sq. ft. of

ancillary office space provided across two floors, totaling 231,448 square feet. Site improvements will be comprised of 10 total truck dock positions, three grade doors, 211 auto parking stalls, and related site, landscaping, drainage, and street improvements. The facility has been designed to house American Jerky Company, a dog treat manufacturing plant, which will produce freeze dried dog treats from human grade ingredients, comprised primarily of chicken. The facility is anticipated to be operational 24 hours a day, five days a week and employ up to 450 workers. The project site is generally located 280 feet south of Nisqualli Road and east of and abutting Hesperia Road. Current development in the area is comprised of industrial uses to the east including operations such as Church and Dwight and Goodyear Tire, and with commercial uses to the north, south and west consisting of fuel stations, restaurants, auto repair facilities and office uses. As proposed and conditioned, the proposal complies with the development standards outlined in the Development Code and Staff recommends approval of the project and its various components as discussed in the following Staff Analysis.

Discussion/Analysis:

1. Environmental Assessment.

Assessment History

The City of Victorville General Plan Program Environmental Impact Report (PEIR), a type of Environmental Impact Report (EIR) that analyzes the environmental effects of a series of related activities, was certified in conjunction with adoption of the General Plan Update completed on January 18, 2022. The PEIR comprehensively evaluated environmental impacts that would result from the implementation of the General Plan, including providing a vision for the City's future and the community's land use, transportation, environmental, economic, and social goals and policies as they relate to land use and development and their cumulative environmental impacts. Feasible mitigation measures are also addressed and included in the PEIR that could reduce or avoid identified environmental impacts.

Assessment Method

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183, a streamlined environmental review process is allowed for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified. Projects meeting these criteria do not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to a project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

In evaluating whether a project can utilize this streamlined environmental review based on consistency with the City of Victorville's General Plan (GP) and the GP PEIR, CEQA Guidelines Section 15183(b) specifies that examination of environmental effects shall be limited to those effects that:

- Are peculiar to a project or a parcel on which a project would be located;
- Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan with which a project is consistent;
- Are potentially significant offsite impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or
- Are previously identified significant effects that, as a result of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

CEQA Guidelines Section 15183(e) specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact. CEQA Guidelines Section 15183(e)(2) further requires the lead agency to make a finding at a public hearing when significant impacts are identified that could be mitigated by undertaking mitigation measures previously identified in the EIR on the planning and zoning action.

Project Assessment

In accordance with the CEQA Guidelines Section 15183 discussed, the project was evaluated to examine whether additional environmental review might be necessary for the reasons stated in CEQA Guidelines Section 15183. As discussed in the CEQA 15183 Checklist dated April 2025 (Attachment C), the project qualifies for an exemption from further environmental review.

The applicant's CEQA consultant, T & B Planning, Inc., prepared the projects CEQA checklist pursuant to Section 15183 of the California Environmental Quality Act. This document is based on the premise that the proposed project is consistent with the City of Victorville's General Plan and General Plan EIR given that CEQA Guidelines Section 15183 allows for the noted streamlined review for projects that are consistent with a general plan for which an EIR has been prepared.

Summary of Findings

The provided CEQA 15183 Checklist found that the project is consistent with the analysis performed for the General Plan PEIR. Further, the GP PEIR adequately anticipated and described the impacts of the buildout of the City, identified applicable mitigation measures necessary to reduce project specific impacts, and the proposed project implements these mitigation measures as indicated in the attached Project Mitigation Monitoring and Reporting Program (Attachment E)

A comprehensive environmental evaluation has been completed for the project, as documented in the attached CEQA 15183 Checklist, concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the City of Victorville General Plan, as analyzed by the City of Victorville General Plan PEIR, and all required findings pursuant to CEQA Guidelines Section 15183 can be made as follows:

1. **The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The Project would develop a 9.9-acre property with a 231,500 sq. ft. industrial manufacturing facility, which is consistent with the development density and land use allowance established by the General Plan and the certified GP PEIR. The proposed industrial development would comply with all applicable zoning requirements, including maximum lot coverage, setbacks, building height and site improvements including parking, landscaping and site design.

2. **There are no project specific effects which are peculiar to the project or its site, and which the GP PEIR failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is adjacent to an area developed with similarly sized, industrial buildings with supporting commercial adjacent to the site. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist attached, all project impacts were adequately analyzed in the GP PEIR. The project could result in potentially significant impacts to biological resources, cultural resources, and noise. However, applicable mitigation measures specified in the GP PEIR have been made conditions of approval for this project.

3. **There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

The project is consistent with the density and land use characteristics considered by the GP PEIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GP PEIR considered the incremental impacts of the project, and as explained further in the 15183 Checklist, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. **There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

As explained in the 15183 Checklist (Attachment C), no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GP PEIR.

5. **The project will undertake feasible mitigation measures specified in the GP PEIR.** As explained in the 15183 Checklist, the project will undertake feasible mitigation measures specified in the GP PEIR. These GP PEIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, and through the project's conditions of approval.

2. **Site Plan.**

General Information

- The applicant is requesting approval of a dog treat manufacturing and processing facility that consists of a 231,500 sq. ft. building that includes 211,198 sq. ft. of manufacturing, storage and distribution space and 19,588 sq. ft. of office space. The building is designed to accommodate all manufacturing and business operations within the enclosed building, with the exception of traffic movement, parking, and the docking of tractor trailers for shipping and receiving at the ten loading bays positioned on the east side of the building. The interior of the proposed building is specifically designed to accommodate various functions of the manufacturing operation, which would include but not be limited to a processing room, equalizing room, boxing room, packaging room, dry material warehouse, washroom, weighting room, and boiler room.
- The manufacturing process will necessitate specialized equipment and technology including: a boiler, conveyor, grinder, mixer, cooker, air drier, steaming equipment, air compressor, ovens (approximately 88), refrigeration equipment, racking and storage, food processing equipment, and packaging equipment.
- Deliveries from various local, regional, and potentially nationwide suppliers to the site are anticipated and will include the following ingredients used in the manufacture of dog treats: protein/chicken (frozen and raw), vegetables, fruits, vegetable glycerin, and packaging materials. The applicant anticipates approximately ten tractor trailers per day making deliveries to the site, five days per week, between the hours of 7 AM and 5 PM. Similarly, it is estimated that finished dog treat products would be transported from the site for distribution to customer warehouses by tractor trailer approximately ten times per day, five days per week, between the hours of 7 AM and 5 PM.
- The project site consists of relatively flat and gently undulating topography with the site sloping to the northeast from approximately 2,969 feet in elevation at the southwest corner of the site to 2,930 feet at the northeast corner. The overall site consists of undeveloped lands that contain light to dense coverage of native and

nonnative plants, in addition to one living and 12 dead Western Joshua Trees. The relocation of the Western Joshua Trees will necessitate the issuance of an Incidental Take Permit, as identified in the CEQA 15183 Checklist and the attached Conditions of Approval (Condition #31).

Project Operational Characteristics

- The manufacturing plant is planned to be operational 24 hours per day, five days per week, Monday to Friday. The facility is expected to employ up to 450 persons on the site with an anticipated maximum of 117 workers per shift. There would be 2 production shifts and 1 sanitation shift per day. The production shift involves the production and manufacturing of finished goods while the sanitation shift involves comprehensive cleaning of all plant tools and production equipment used in the production of finished goods and the inside and outside of the facility.
- The dog treat production process begins with human food-grade raw materials (mainly chicken) that are stored in a freezer. When the food is removed from the freezer, it is defrosted, mixed and formed into desired jerky product (dog treat) shapes. The pieces are then put through dehydration units (low temperature ovens) where they are dried, then steamed and/or cooled before they are packaged as finished products.
- To evaluate whether the project had the potential to generate an objectional odors, odor studies were commissioned to study the potential impacts of the manufacturing process on the community, which included evaluating the production process, and a study of the applicant's current facility in the City of Ontario. In addition to these studies, the applicant-initiated discussions with the Mojave Desert Air Quality Management District (MDAQMD) on the districts permit requirements and provided facility tours and inspections of operational equipment. The results of the studies found the only potential source of odors identified during the facilities operation would be the release of odors into the atmosphere from the oven exhaust, which based on study results, if found detectable would only be onsite (i.e. in the proposed projects parking lot). Moreover, the Project would be required to comply with MDAQMD Rule 402. 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."

Based on the preceding, the potential for the project to create objectionable odors affecting a substantial number of people is considered less-than-significant as MDAQMD required permits and regulations would preclude the facility from generating objectional odors. Conditions #32-37 have been included requiring compliance with MDAQMD permitting requirements. Accordingly, there are no

direct or cumulatively-considerable impacts of the project that were not already evaluated by the 2022 PEIR; and there are no new or more severe impacts to the environment beyond what was previously evaluated and disclosed by the 2022 PEIR.

Access and Parking

- Access to the project site would be provided by three driveways, one primary shared truck driveway along Nisqualli Road and a second shared driveway along Hesperia Road, both of which are Circulation Element designated roadways allowing both inbound and outbound access. These access points are shared with the adjacent fuel station which also serves commercial truck traffic. Additionally, the facility will have a single dedicated passenger vehicle driveway along Hesperia Road intended for employees and guests, however, the site is designed for passenger vehicles to also access the site from both shared access drives previously mentioned.
- Regional and local truck access to the project site is proposed via Hesperia Road to Bear Valley Road to I-15 or Hesperia Road to Nisqualli Road to I-15. In the area of the project site Hesperia Road, Bear Valley Road and Nisqualli Road are designated truck routes as shown on the City's General Plan and designated as such by Victorville Municipal Code §12.36.050. I-15 is designated as a truck route by Caltrans.
- For manufacturing and industrial plants, Title 16 requires 1 parking space for each employee at the highest shift change, plus 1 space per 300 sq. ft. of office floor area. Based upon the operational standards noted by the applicant, the facility will see a maximum of 117 employees on site during highest shift change, in addition to the employees who will utilize the office parking required by the noted standard above. As further clarified in the table below, the proposal is in accord with off-street parking requirements as 186 spaces are provided (excluding the 25 excess compact parking spaces provided) whereas 183 are required.

AUTOMOBILE PARKING REQUIREMENTS			
Building Use	Total Sq. Ft.	Parking Ratio	Required Parking
Manufacturing	211,860	(1 space for employee at highest shift change)	117
Office	19,588	(1/300 sq ft)	66
<i>Total Required Parking</i>			183
<i>Total Provided Parking</i>			186 + 25 compact spaces

Development Standards

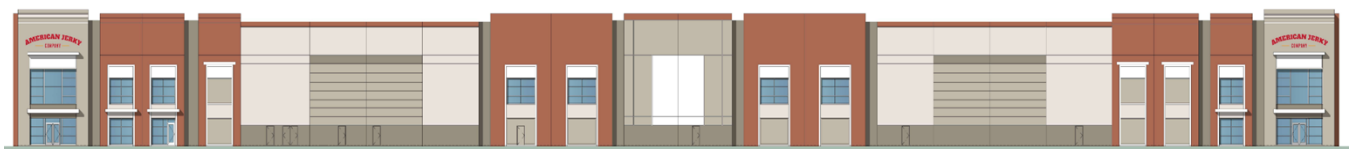
- The proposal generally complies with Title 16 and Industrial Design Guidelines landscaping requirements, since planters are provided throughout the parking

areas, along the project perimeter, at the base of the building and adjacent to the public right-of-way. To ensure the proposal remains in full compliance with Title 16 standards, Staff has included Conditions #11-15, requiring all plant species and groundcover to be installed in accordance with Title 16 standards, rock groundcover provided, ongoing maintenance is confirmed, and minimum planter widths are provided and maintained.

- The truck courts and loading areas are proposed to be screened from the public view by a combination of 8-foot-tall screening walls and 8-foot-tall wrought iron screen fencing with decorative pilasters and landscaping. However, the wall and fencing details, including the decorative elements, have not been confirmed. Consequently, to ensure adequate screening is achieved and is consistent with the materials provided elsewhere on site, Staff has included Condition #16 requiring the wall and/or fence details to be provided during plan check subject to Zoning Administrator review and approval.
- The proposal complies with all general development standards of the Victorville Municipal Code (V.M.C.) including setbacks, lot coverage, and building height.
- In accordance with the latest energy efficient standards adopted by the City, the building and site design will include various environmentally sustainable features in accordance with the City's Climate Action Plan (CAP) such as enhanced window insulation, a cool roof, rooftop solar photovoltaic panels, energy-efficient heating/cooling equipment, energy-efficient water heaters, water-efficient landscaping, and exterior shade provided by landscaping and structural elements.

Elevations

- The proposed manufacturing and distribution facility is well designed and in accordance with the City's Industrial Design Guidelines. As proposed, the building elevations provide variation in wall planes and parapet heights, and various materials, colors and textures. The building will be constructed with concrete tilt-up panels, with special architectural features and colors at the office locations and street facing elevations. The proposed building's exterior color palette will be comprised of various shades of tan, grey and brown earth tones with white accents. Decorative building elements include horizontal panel inlays, panel reveals, parapets, mullions and canopies. Staff supports the elevations as proposed given they complement industrial development proposed throughout the City and find them to be in accordance with the Industrial Design Guidelines.



3. Industrial Design Guideline Compliance:

Site Planning and Design

- a) Site Grading: The site drains from west to east. Grading plans will alter the existing grade to accommodate the project, but drainage will still flow to the east where the project has been designed to include underground on-site retention.
- b) Paving Treatment: Enhanced paving has been provided at the main employee drive entrance and at the building entries with conditions included requiring details to be provided at building plan check.
- c) Parking and Circulation: The customer and employee parking and drive aisles have been separated largely from the truck court while the site plan has been designed to utilize existing shared access points to the site with the fuel station development to the north.
- d) Pedestrian Circulation: The applicant will need to provide an accessible pedestrian access from the abutting roadway to the building entrance, which will be addressed during the building plan check process.
- e) Loading Facilities: Loading/unloading areas of the site and building are largely screened from the public view due to their orientation away from the abutting roadways, fencing and landscaping.
- f) Open Space, Park Land, and Trails: The site contains landscape areas for visual open space however no outdoor employee areas have been proposed. The interior does however contain two large employee breakrooms.
- g) Landscaping: The landscaping area is sufficient, including within the parking area, along the base of the building, around the perimeter and at the street in accordance with Title 16 Development standards.
- h) Parking Lot Area Planting: Landscape fingers and planters are provided as required by Code as conditioned.
- i) Walls and Fencing: Architecturally compatible concrete tilt-up walls and wrought iron fencing with decorative pilasters is proposed around the truck court.
- j) Utility and Mechanical Equipment: The trash enclosure and compactor are located on the interior of the site and screened from view with sufficient landscape area to screen other utility equipment as needed.

Building Design

- a) Continuity: Staff considers the proposed building to be well designed and compatible with the scale and massing of similar industrial buildings recently approved by the Planning Commission. Additionally, due to grade differences between the buildings pad height and Hesperia Road, the building is anticipated to be in scale with the developments up and down the adjacent roadway.
- b) Massing: The proposal incorporates varying wall planes, parapet heights, and building materials that avoids long unbroken wall planes and provides distinct building entries.
- c) Building Form: The building treatments and variation in massing create texture and an overall human scale.
- d) Roof Forms and Parapets: The vertical tower elements provide roof variation to a rather horizontal roof line.

- e) Roof Drains: Roof drains and/or overflow scuppers are not visibly exposed on the elevations and have been conditioned to remain internally located excepting for the eastern truck court.
- f) Windows: Blue tinted glass is proposed to complement the modern design of the building and enhance the building entries.
- g) Entry Features: A tower element and projecting entry and canopy features have been provided at the building entries creating a focal point for the building.
- h) Building Materials and Texture: The building has a variety of materials that improve the appearance of the building and add to its architectural theme, including metal awnings, horizontal inlay treatments and canopies.
- i) Colors: Various shades of tan, grey and brown earth tones with white accents with the use of clear anodized aluminum mullions.
- j) Lighting: Any exterior lighting proposed will be required to coordinate with the projects architectural theme as conditioned.
- k) Signage: Required to comply with V.M.C. standards as conditioned.

Site Characteristics:

	Existing Land Use	General Plan	Zoning	Specific Plan
Site	Vacant Land	Heavy Industrial	M-2	N/A
North	Fuel Station	Heavy Industrial	M-2	N/A
South	Vacant Land	Commercial	C-2	N/A
East	Vacant Land	Heavy Industrial	M-2	N/A
West	Office Buildings	Commercial	C-2	N/A

Number of Radius Letters Mailed: 14

Attachments:

- Attachment A – Site Plan Resolution No. P-25-014
- Attachment B – Site Plan Graphics
- Attachment C – CEQA 15183 Checklist Document
- Attachment D – Special Studies
- Attachment E – Mitigation Monitoring and Reporting Program
- Attachment F – Aerial Image