COUNTY OF SAN BERNARDINO
NOTICE OF AVAILABILITY (NOA) / NOTICE OF INTENT (NOI) TO ADOPT
A MITIGATED NEGATIVE DECLARATION (MND)
ALERE WAREHOUSE @ CAJON BOULEVARD PROJECT

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the County has prepared a Draft Mitigated Negative Declaration (MND) that will identify and evaluate the environmental impacts of the Alere Warehouse @ Cajon Boulevard Project.

Project Title: Alere Warehouse @ Cajon Boulevard Project.

Project No.: P201700647/MUP

Project Location: The project site is located at 19416 Cajon Boulevard.

Project Description: A Minor Use Permit to construct and operate a 321,496-square-foot concrete tilt-up warehouse building, which includes 20,000 square feet of office/administrative uses. The project site is approximately 20 acres (Assessor Parcel Number [APN] 0262-041-09, 13, 18 and 20), and is located on the north side of Cajon Boulevard, approximately 2,500 feet south of Kendall Drive and Cajon Boulevard intersection, in the Heavy Industrial (HI) zoning district, in the Glen Helen Specific Plan.

Environmental Review and Public Comment: The circulation of the Draft Mitigated Negative Declaration is to encourage written public comments. Interested persons can review the MND at the following physical location:

Land Use Services Department - Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

You may also obtain the document in electronic format at http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx or by emailing the Planner at aron.liang@lus.sbcounty.gov. To request a PDF version of the document from the Land Use Services Department database, please reference the project number above.

The comment period on the MND closes on December 12, 2018 **at 4:30 PM.** Please submit comments to aron.liang@lus.sbcounty.gov.

Aron Liang, Senior Planner
909-387-0235
County of San Bernardino
Land Use Services Department - Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

SAN BERNARDINO COUNTY
INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of the Initial Study pursuant to San Bernardino County Guidelines under Ordinance 3040 and CEQA Guidelines Section 15063.

PROJECT LABEL:

APN:	0262-041-09, -13, -18, & -20
APPLICANT:	Alere Property Group, LLC
COMMUNITY:	Bloomington /5th Supervisorial District
LOCATION:	Northeast of, and abutting Cajon Blvd. and southwest of Kendall Drive
STAFF:	Aron Liang, Senior Planner
REP('S):	T&B Planning, Inc
PROPOSAL:	Minor Use Permit to construct an approximately 321,496 square-foot light industrial/warehouse building on approximately 20 acres

USGS Quad:	Devore
T, R, Section:	T01N R05W 2
OLUD:	Heavy Industrial (GH/SP – HI)
Planning Area:	Glen Helen Specific Plan
Overlays:	Burrowing Owl Overlay Zone

PROJECT CONTACT INFORMATION:

Lead Agency: County of San Bernardino
Land Use Services Department – Planning Division
385 North Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Contact Person: Aron Liang, Senior Planner
Phone No. (909) 387-0235; *Fax No.* (909) 387-3249
E-mail: Aron.Liang@lus.sbcounty.gov

Project Sponsor: Alere Property Group, LLC
100 Bayview Circle
Newport Beach, CA 92660

Consultant: T&B Planning, Inc.
17542 East 17th Street, Suite 100
Tustin, CA 92780

PROJECT DESCRIPTION:

The Alere Warehouse @ Cajon Boulevard project (hereafter referred to as the "Project" and as described in further detail on the following pages) consists of an application for a Minor Use Permit (P201700647) to develop an approximately 20-acre property located immediately northeast of Cajon Boulevard and southwest of Kendall Drive. Figure 1, *Regional Map*, and Figure 2, *Vicinity Map*, depict the location of the Project site. Copies of the entitlement application materials for the proposed Project are herein incorporated by reference pursuant to CEQA Guidelines § 15150 and are available for review at the County of San Bernardino Land Use Services Department, Planning Division, located at 385 N. Arrowhead Avenue, San Bernardino, CA 92415.

MINOR USE PERMIT (P201700647)

As shown on Figure 3, *Conceptual Site Plan*, the Project Applicant proposes to construct a 321,496 s.f. warehouse facility on the subject property. The proposed building would contain 301,496 s.f. of warehouse floor area and 20,000 s.f. of office/mezzanine space. Vehicular access to the Project site would be provided by two driveways fronting Cajon Boulevard. Both driveways would accommodate full access for both passenger vehicles and trucks.

Parking and Loading

Figure 3 depicts the location of parking spaces and loading bays for the Project. The Project would include a minimum of 370 total parking spaces, with 186 automobile spaces (including 7 handicap spaces) and 184 truck trailer spaces, and two bicycle rack areas. The Project includes 52 loading docks and two (2) drive through doors within an enclosed loading/unloading area on the northeast side of the building. The Project complies with the minimum parking requirements of the Glen Helen Specific Plan and the County of San Bernardino Development Code.

The Project also may include an additional 37 parking spaces for automobiles within a Southern California Edison transmission line easement that traverses the western portion of the Project site. Parking within the easement would be subject to approval by Southern California Edison via their Consent Review process. If Southern California Edison approves the Project's proposal for parking within the easement, the Project would include a maximum of 223 automobile parking spaces.

Conceptual Architecture

Figure 4, *Conceptual Architectural Elevations*, depicts the Project's conceptual architectural design. The proposed warehouse building would be constructed to a maximum height of approximately 46 feet (measured from finished floor to the top of the parapets). The building would be constructed with painted concrete tilt-up panels and low-reflective, blue-glazed glass. Articulated building elements, including a varied roofline, parapets, wall recesses, and mullions are proposed as decorative elements. The exterior color palette for the proposed building is comprised of various neutral colors, including shades of white and gray.

Figure 1 Regional Map

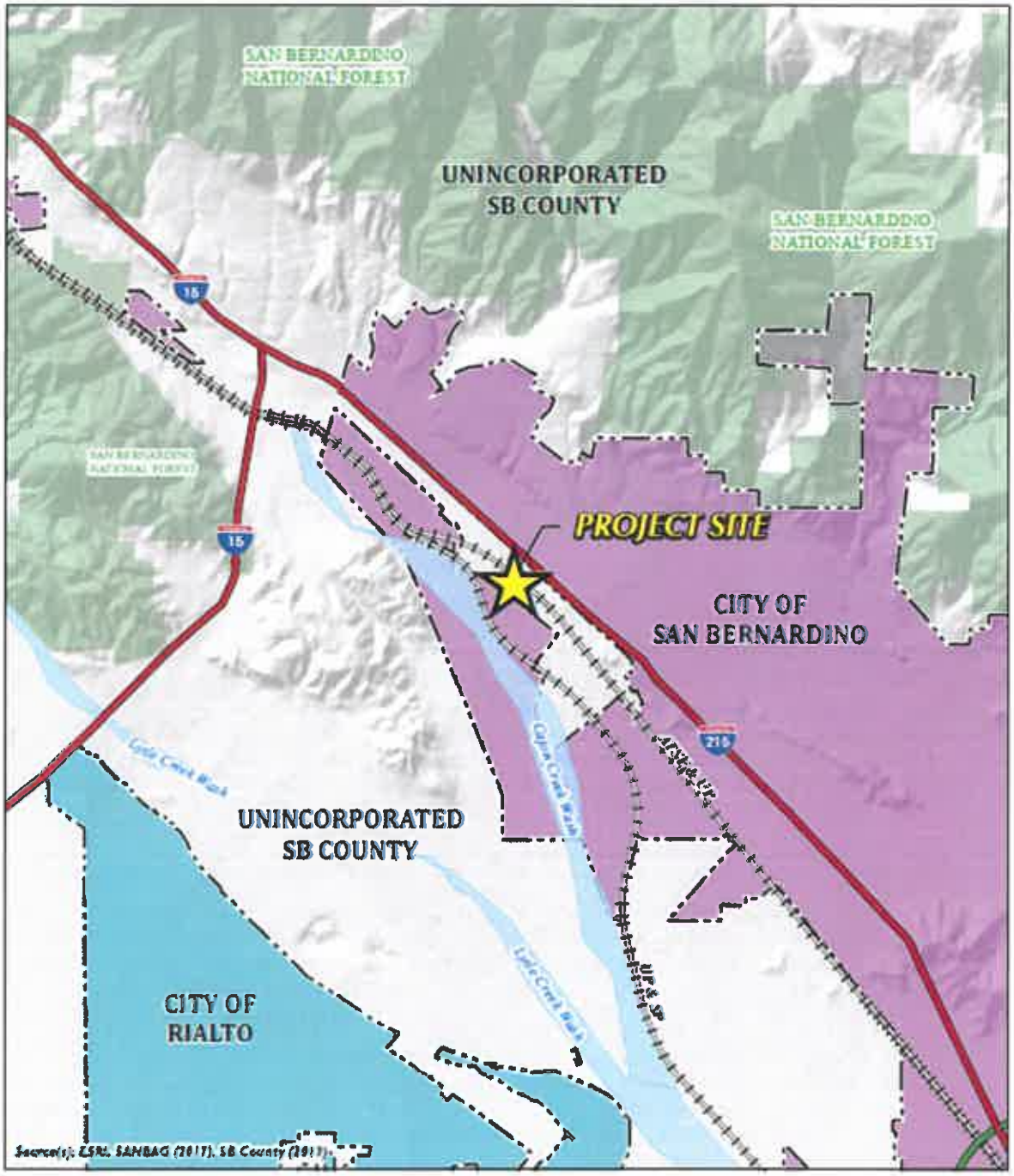


Figure 1

Regional Map

Figure 2 Vicinity Map

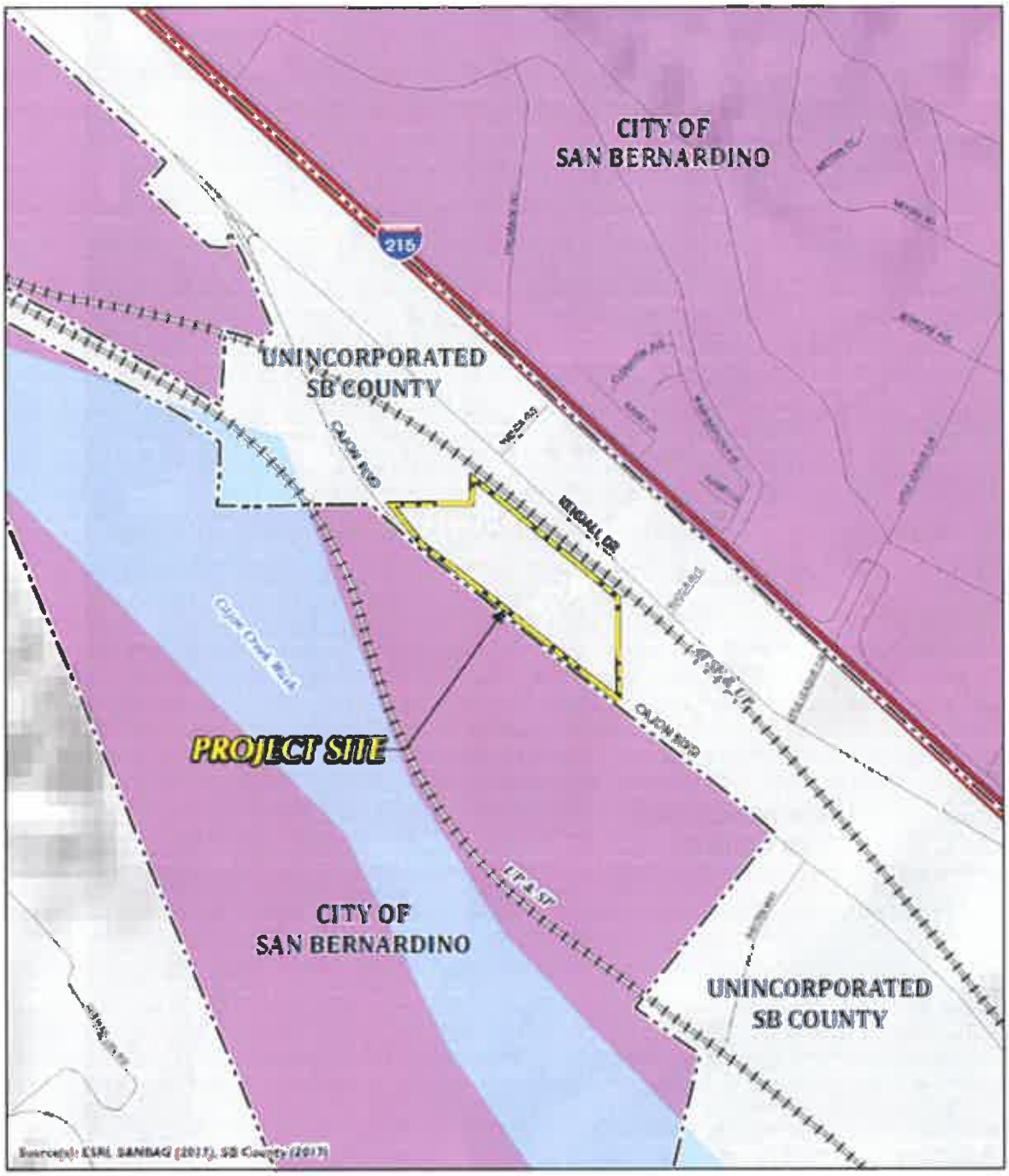


Figure 2

Vicinity Map

Figure 3 Conceptual Site Plan

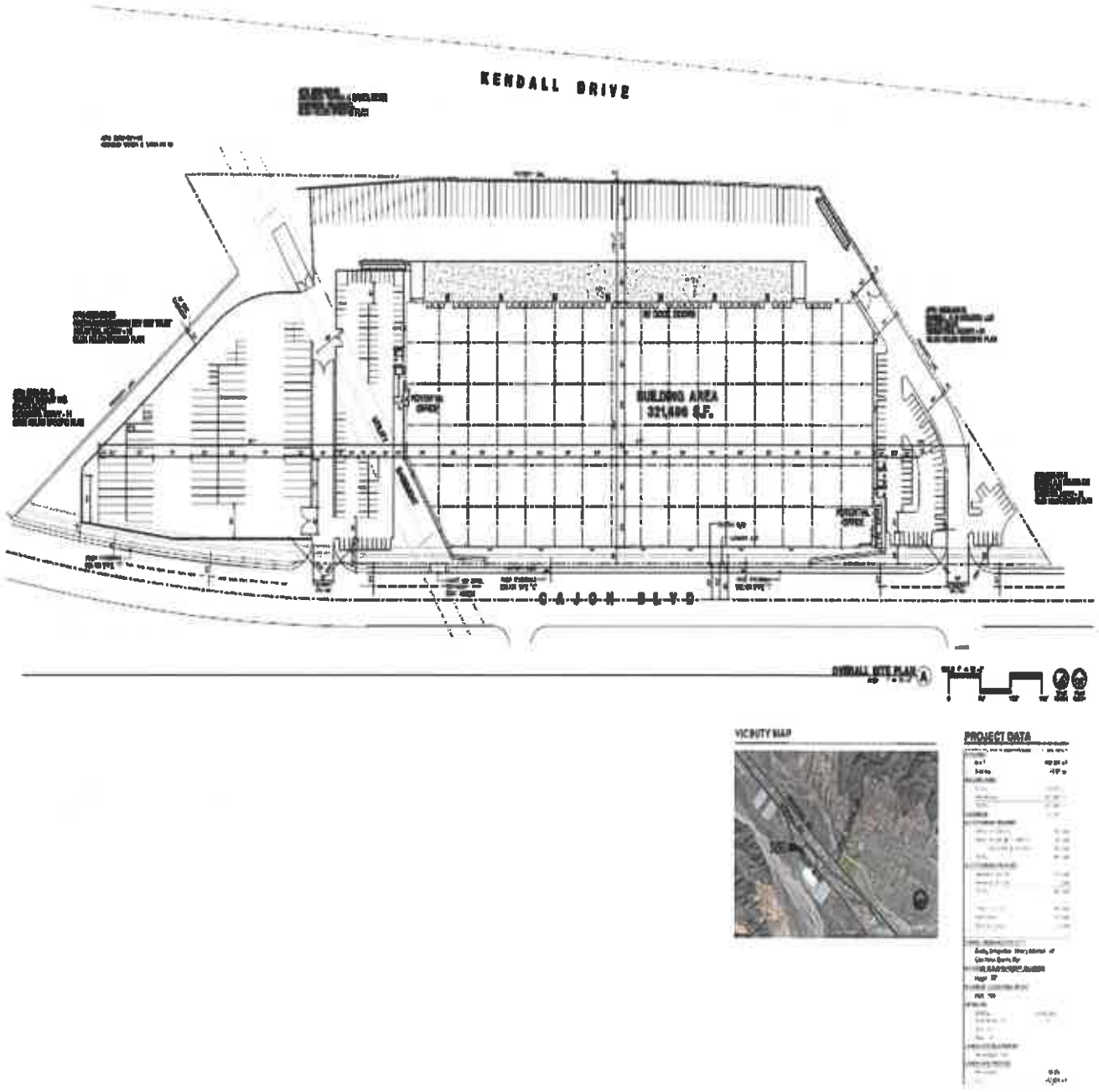


Figure 4 Conceptual Architectural Elevations

Conceptual Landscape Plan

The Project's conceptual landscape plan is depicted in Figure 5, *Conceptual Landscape Plan*. Proposed landscaping would be ornamental in nature. Landscaping would feature drought-tolerant trees, shrubs, accent succulents and ornamental grasses, and groundcovers. Plant materials would be concentrated along the Project site's frontage with Cajon Boulevard, along the slopes at the northern boundary of the Project site, at building entries, and within the automobile parking lot. The Project's planting and irrigation plans are required to comply with Chapter 83.10 of the County of San Bernardino Development Code, which establishes requirements for landscape design, irrigation system design, and water-use efficiency.

PROJECT TECHNICAL CHARACTERISTICS

Project Improvements

❑ Public Roadway Improvements

The only public street abutting the Project site is Cajon Boulevard. Under existing conditions, Cajon Boulevard is partially developed along the Project site's frontage with three vehicular travel lanes (two southeast-bound lanes and one northwest-bound lane), a bike lane/shoulder on the northern/eastern side of the road, a painted median, and a sidewalk with a landscape parkway along the southern/western side of the road. The Project would improve the northern/eastern side of Cajon Boulevard, along the Project site's frontage to the ultimate half-width of Cajon Boulevard by constructing an additional northwest-bound lane, a five (5)-foot-wide, curb-adjacent sidewalk, and a seven (7)-foot-wide landscaped parkway.

❑ Water Infrastructure

Water service would be provided to the Project site by the SBMWD. Under pre-development conditions, water service is available to the Project area via two (2) 12-inch-diameter water mains beneath Cajon Boulevard.

To provide water service to the Project site, the Project would construct six (6) new connections to the existing 12-inch-diameter water mains beneath Cajon Boulevard – four (4) connections for fire hydrants/service, one (1) connection for new domestic service, and one (1) connection for irrigation service. The Project's proposed water infrastructure improvements are depicted on Figure 6, *Conceptual Water Utility Plan*. All proposed water facilities would be designed and constructed in accordance with SBMWD standards.

❑ Wastewater Infrastructure

Wastewater conveyance and treatment services are provided to the Project site by the SBMWD. Under existing conditions, sewer service is available in the Project area via a 15-inch-diameter sewer main beneath Cajon Boulevard. As shown on Figure 7, *Conceptual Sewer Plan*, the Project would construct one (1) new connection to the existing 15-inch-diameter sewer main beneath Cajon Boulevard. All proposed wastewater facilities are required to be designed and constructed in accordance with SBMWD standards.

Figure 5 Conceptual Landscape Plan

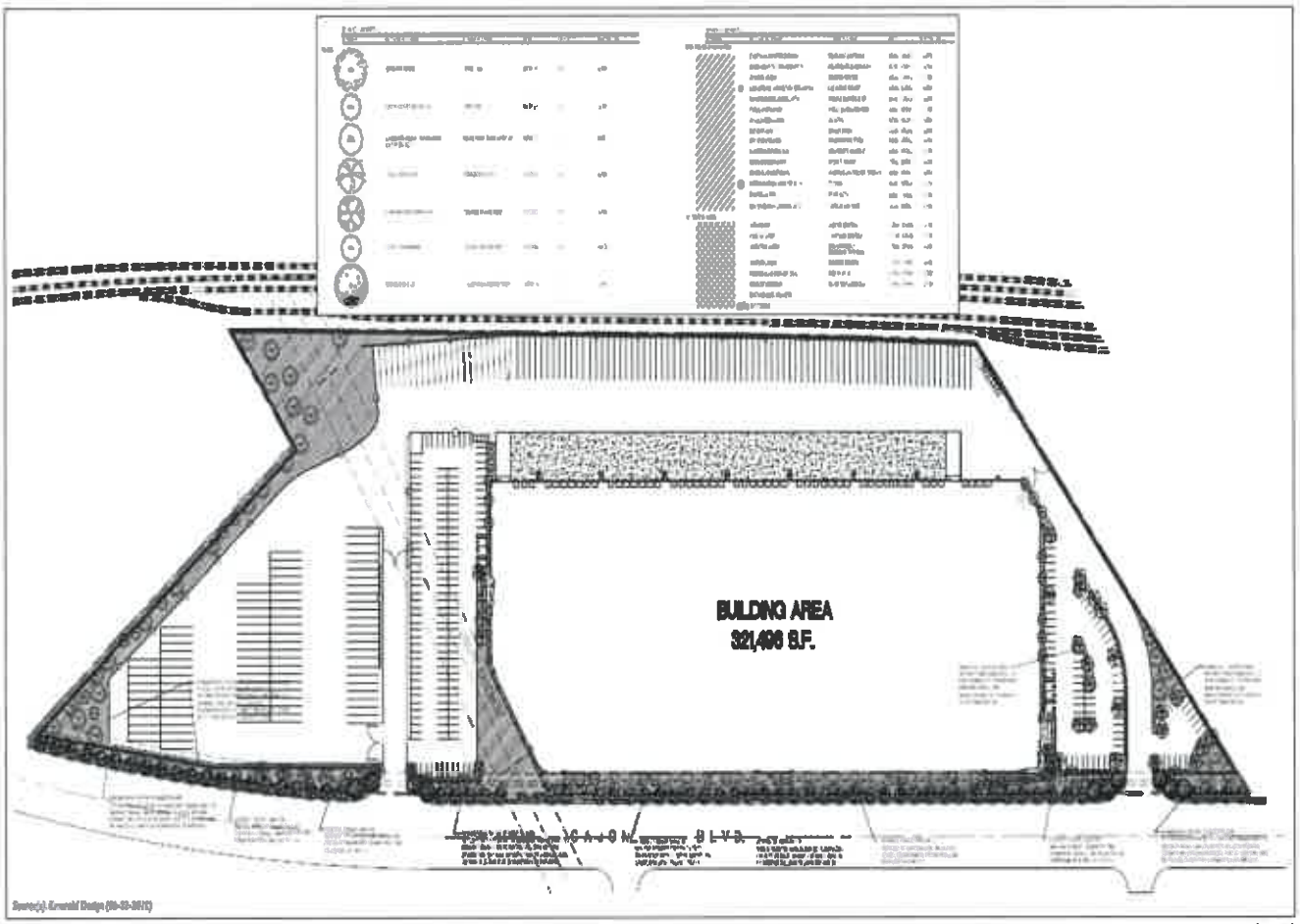


Figure 5

Conceptual Landscape Plan

Figure 6 Conceptual Water Utility Plan

Figure 6

Conceptual Water Utility Plan

Figure 7 Conceptual Sewer Plan

Figure 7
Conceptual Sewer Plan

❑ Drainage Plan

The Project's storm water drainage system is depicted on Figure 8, *Conceptual Drainage Plan*. The Project's on-site storm water drainage system would consist of catch basins, underground storm drain pipes, water quality basins, and one (1) underground infiltration basin located at the southeast of the proposed building. The system is designed to collect, treat, and/or temporarily detain storm water runoff before discharging treated flows off-site. The proposed underground infiltration basins would facilitate percolation to maximize on-site infiltration and minimize off-site storm water discharge.

❑ Earthwork and Grading

As shown on Figure 9, *Conceptual Grading Plan*, earthwork and grading would occur over a majority of the Project site (the two existing steel H-frame electrical line transmission towers and an approximate 25-foot radius surrounding each tower would not be impacted by the Project). Proposed earthwork and grading activities would occur in one phase and would result in approximately 91,832 cubic yards (c.y.) of cut and 91,832 c.y. of fill. No import or export of soil materials would be required. Proposed manufactured slopes on-site would reach a maximum incline of 2:1.

Construction Characteristics

The proposed Project is expected be constructed over the course of approximately eight months (Urban Crossroads, 2018a, Table 3-2). Construction activities would commence with site preparation and the removal of the storage and equipment related to the existing gunite operations on the subject property. After site preparation, the property would be graded, and underground infrastructure would be installed. Next, surface materials would be poured and the building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing/walls, and other site improvements would be installed, and fine grading would occur. Construction equipment is expected to be in operation on the Project site eight hours per day, five days per week during the construction phase. The types and numbers of heavy equipment expected to be used during construction activities are summarized in Table 3-3 of *Technical Appendix A*.

Operational Characteristics

At the time this MND was prepared, the future occupant(s) of the Project proposed warehouse building were unknown. The Project Applicant expects that the building would be occupied by warehouse distribution operators, and the building is not designed to include any cold storage or refrigerated uses. For purposes of evaluation in this MND, it is anticipated that the Project would be operational in the year 2019. The Project could be operational 24 hours per day, seven days per week, with exterior loading, and parking areas illuminated at night. Lighting would be subject to compliance with San Bernardino County Development Code § 83.07.030, which states that outdoor lighting of commercial or industrial land uses shall be fully shielded to preclude light pollution or light trespass. The building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the loading, and unloading of tractor trailers at designated loading bays. The outdoor cargo handling equipment used during loading, and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) are expected to be powered by non-diesel-fueled engines (e.g., natural gas, electric) (Urban Crossroads, 2018b, p. 4). During long-term operating conditions, the Project is calculated to generate approximately 560 actual vehicle trips on a daily basis, including 448 passenger vehicle trips and 112 truck trips. (Urban Crossroads, 2018f, Table 4-1).

Figure 8 Conceptual Drainage Plan

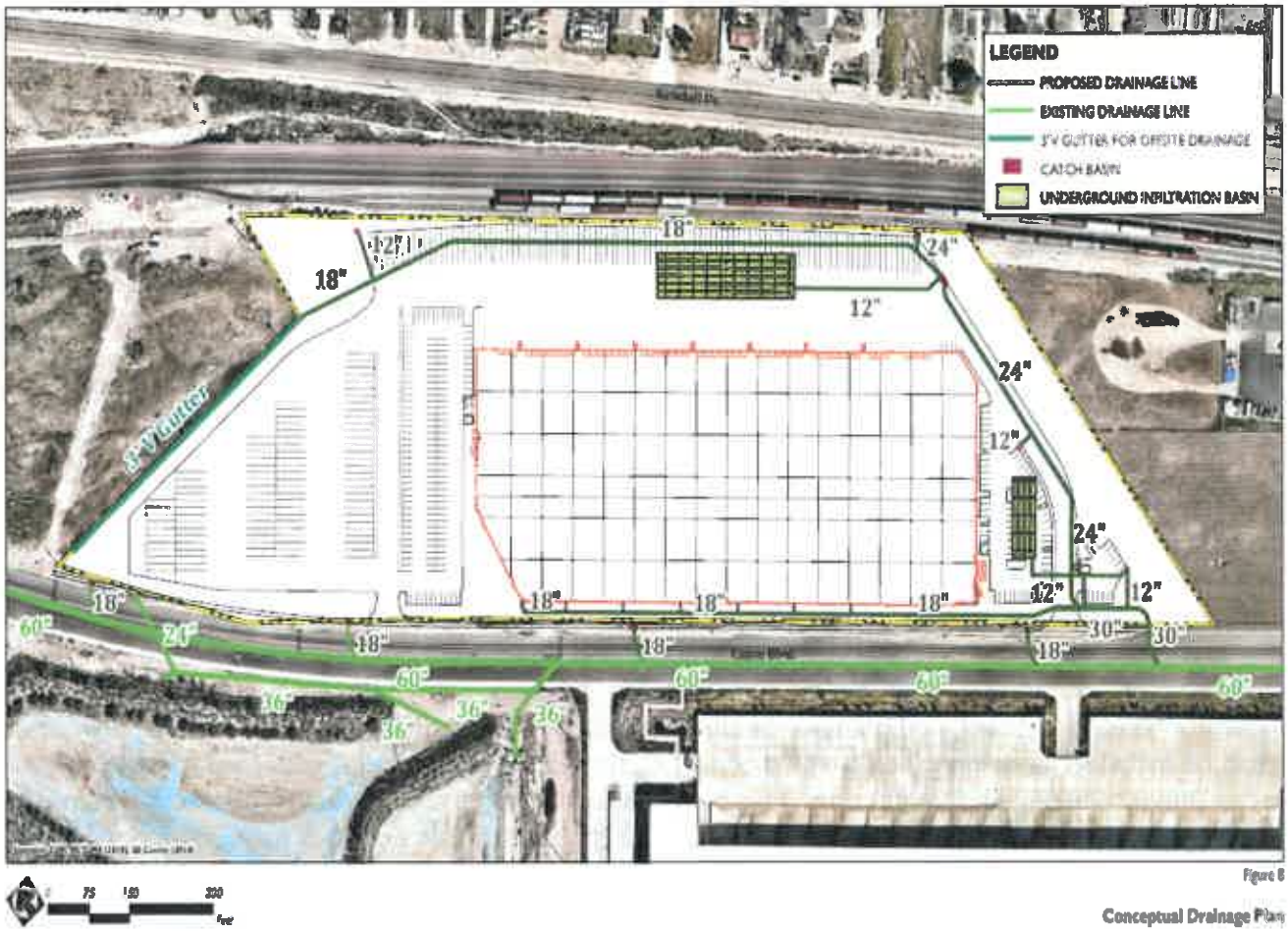
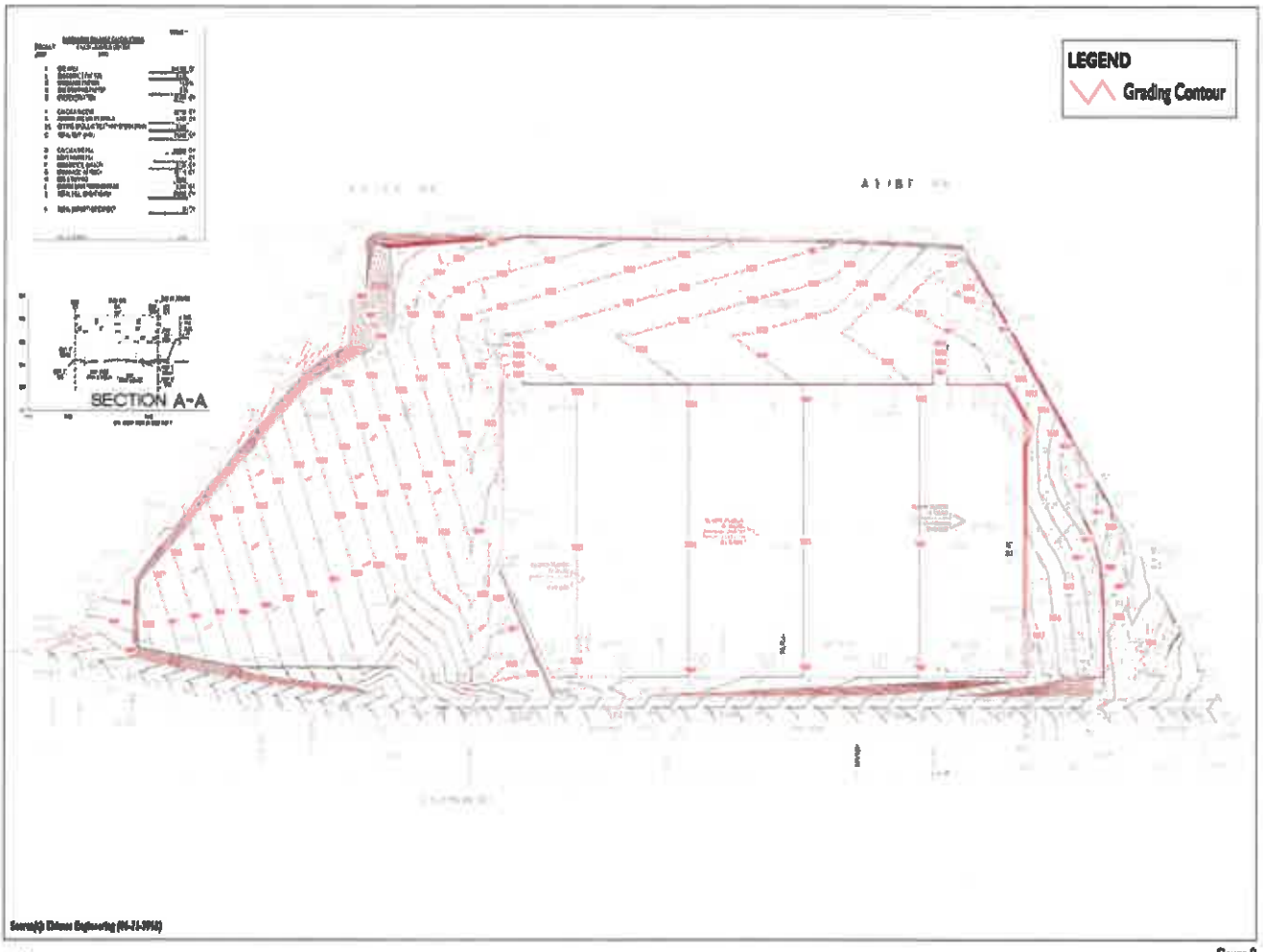


Figure 8

Conceptual Drainage Plan

Figure 9 Conceptual Grading Plan



Based on calculations from the Project's energy analysis (*Technical Appendix E)*, the Project's operational energy use is estimated at approximately 845,951 kilowatt hours (kWh) per year, and natural gas usage is estimated at approximately 652,637 kilo-British thermal units per year (kBTU/yr) (Urban Crossroads, 2018c, p. 28). The Project's daily water usage and sewer generation are estimated to be approximately 37,000 gallons per day based on generation rates from the City of San Bernardino Public Works Department (SBPWD, 2014, Table A).

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

Pursuant to CEQA Guidelines § 15125, the physical environmental condition for purposes of establishing the setting of an MND is the environment as it existed at the time the Lead Agency commenced the environmental analysis for the project. The Project's application was filed with the County of San Bernardino in October 2017 and the environmental review commenced at that time. As such, the environmental baseline for the Project is established as October 2017 and the following subsections provide a description of the Project site's physical environmental condition as of that approximate date. Topics are presented on the following pages in no particular order of importance.

General Plan and Zoning Designations

The County of San Bernardino General Plan Land Use and Zoning District Maps designates the Project site as "Glen Helen Specific Plan (GH/SP)." The GHSP "create[s] a comprehensive guide for quality land development with a viable program for building and financing the infrastructure necessary to support it." (SB County, 2015, p. 1-6) The GHSP includes specific zoning designations and standards for development within its geographical boundaries which supersede those of the County's General Plan and Development Code. As shown on Figure 10, *Glen Helen Specific Plan Land Use Plan*, the GHSP applies a "Heavy Industrial (HI)" zoning designation to the Project site (SB County, 2015, Exhibit 2-2). Pursuant to GHSP § GH2.04229(b), the HI zoning designation allows for the warehousing use proposed by the Project with the approval of a Minor Use Permit (SB County, 2015, p. 2-59). The Project site is also located within the "Biotic Resources Overlay" which applies to the entirety of the GHSP boundary. The Biotic Resources Overlay requires projects that propose to alter at least 25% of the land within potentially sensitive habitats to prepare a biological report that characterizes the habitat types and identifies the presence or the potential occurrence of sensitive species. (SB County, 2015, p. 2-115) Refer to GHSP Division 2, *Land Use Plan and Development Standards*, and Division 3, *Design Guidelines*, for more information on the specific development regulations and design standards that apply to the Project site.

Land Use

Based on historical aerial photography, the Project site remained undeveloped until approximately 1938 when two high-tension electrical transmission lines were installed along the northwestern portion of the property. Between 1953 and 1959, small structures appeared in the northwestern portion of the Project site which were precursory to the Al Jo Lumber Company, a lumber mill/wood working operation, that was operated on the northwestern portion of the Project site until 2005. Since 2005, the northwestern portion of the Property has been used for truck and truck trailer parking and as a storage yard/staging area for a swimming pool gunite business. The eastern/southeastern portion of the Project site has never been developed but has been maintained with minimal weed abatement activities. (SCS Engineers, 2017, pp. 7, 10-11, Appendix C) The Project site's existing uses are depicted on Figure 11, *Aerial Photograph*.

Figure 10 Glen Helen Specific Plan Land Use Plan

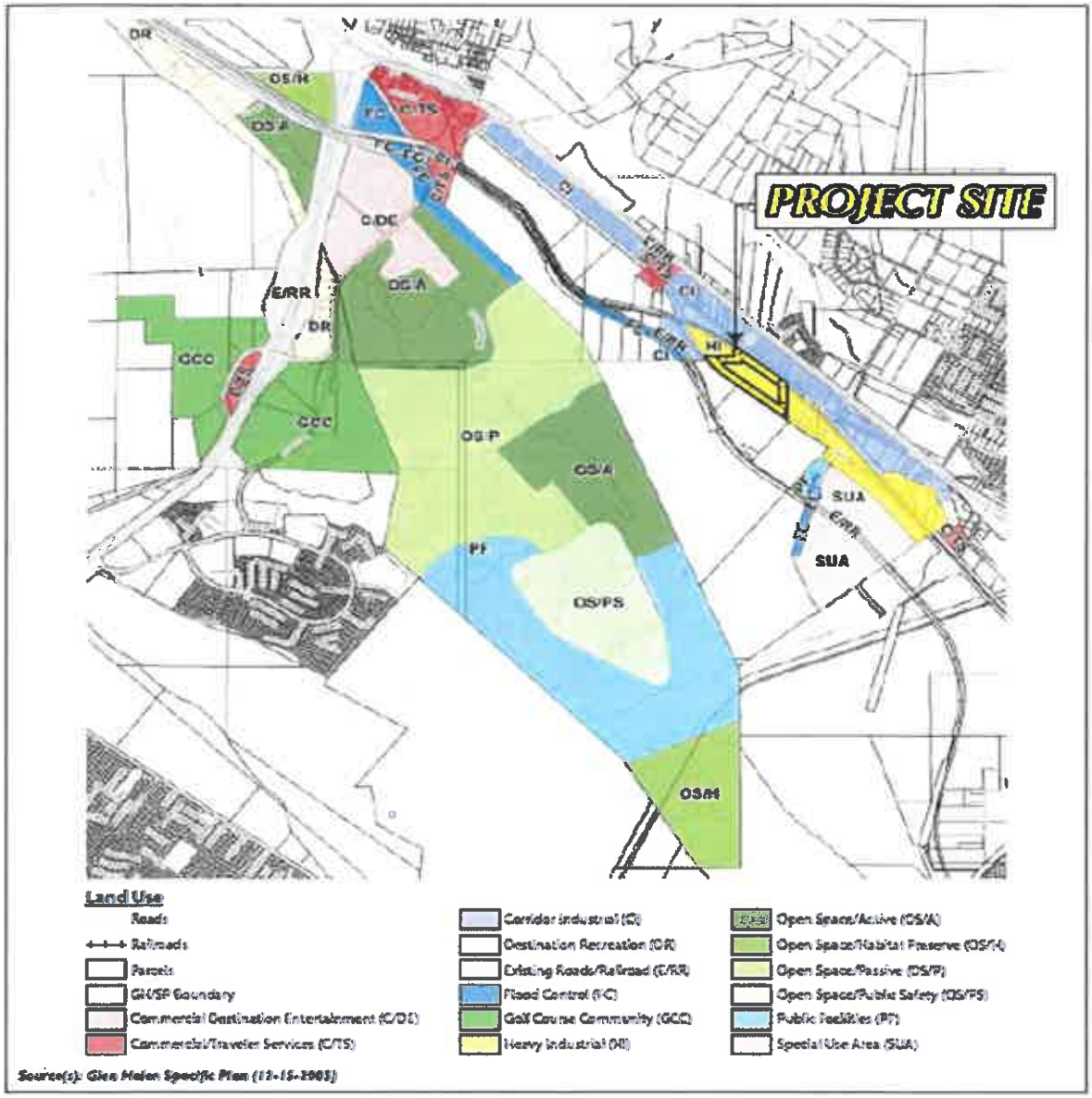


Figure 10

NOT TO SCALE

Glen Helen Specific Plan Land Use Plan

Figure 11 Aerial Photograph

Figure 11

Aerial Photograph

Surrounding Land Uses and Development

Figure 12, *Surrounding Land Uses and Development*, depicts the existing land uses immediately surrounding the Project site. Land uses surrounding the Project site generally include warehouses, vacant lands, a vehicle junkyard, a granary, railroad tracks, non-conforming single-family homes, and rural commercial businesses. The specific land uses surrounding the Project site are described below.

Northeast/Northwest

The Project site's northeastern boundary abuts the Atchison, Topeka and Santa Fe (ATSF) and Union Pacific (UP) railroad lines. Farther northeast of the rail lines is Kendall Drive and non-conforming single-family homes and rural commercial businesses that front Kendall Drive. Directly northwest of the Project site is vacant land that appears to be routinely disturbed by weed abatement activities. Farther northwest of the Project site (immediately west of Cajon Boulevard) is a vehicle junkyard (DC Auto Parts & Recycling).

Southeast/Southwest

The Project site's entire western/southwestern boundary fronts Cajon Boulevard. A Southern Pacific (SP) / UP railroad line is located approximately 0.10-mile west of the Project site. Southwest of the Project site (southwest of Cajon Boulevard in the City of San Bernardino) are two large warehouse facilities (approximately 800,000 s.f and 825,000 s.f) which both include automobile parking, exterior lighting and ornamental landscaping along their frontages with Cajon Boulevard. Directly southeast of the Project site is vacant land disturbed by weed abatement activities. Farther southeast of the Project site is a granary operation comprising of silos which are easily visible from Cajon Boulevard and Kendall Drive.

Aesthetic and Topographic Features

The Project site is perceived as flat, with a topographic high point of approximately 1,845 feet above mean sea level (amsl) in the northwest corner of the site and a topographic low point of approximately 1,801 feet amsl in the southern corner of the site. The overall topographic relief of the Project site is approximately 44 feet. Figure 13, *USGS Topographic Map*, illustrates the topographic character of the Project site.

The Project site's aesthetic character is primarily defined by disturbed and undeveloped land. The northwestern portion of the Project site contains minimal vegetation and is used as a storage yard/staging area. A chain link fence is installed around the perimeter of the storage yard and along the Project site's northwestern frontage with Cajon Boulevard. The undeveloped land in the eastern/southeastern portion of the Project site contains both disturbed and undisturbed vegetation. Additionally, two steel H-frame towers supporting overhead electricity transmission lines traverse the western portion of the Project site in a north-south orientation and five wooden poles supporting overhead electricity transmission lines are located off-site, abutting the Project site's northern boundary. The existing aesthetic conditions of the Project site are illustrated on Figure 14, *Site Photograph Key Map*, Figure 15, *Site Photographs 1 & 2*, Figure 16, *Site Photographs 3 & 4*, and Figure 17, *Site Photographs 5 & 6*.

Figure 12 Surrounding Land Uses and Development

Figure 12

0 125 250 500 Feet

Surrounding Land Uses and Development

Figure 13 USGS Topographic Map

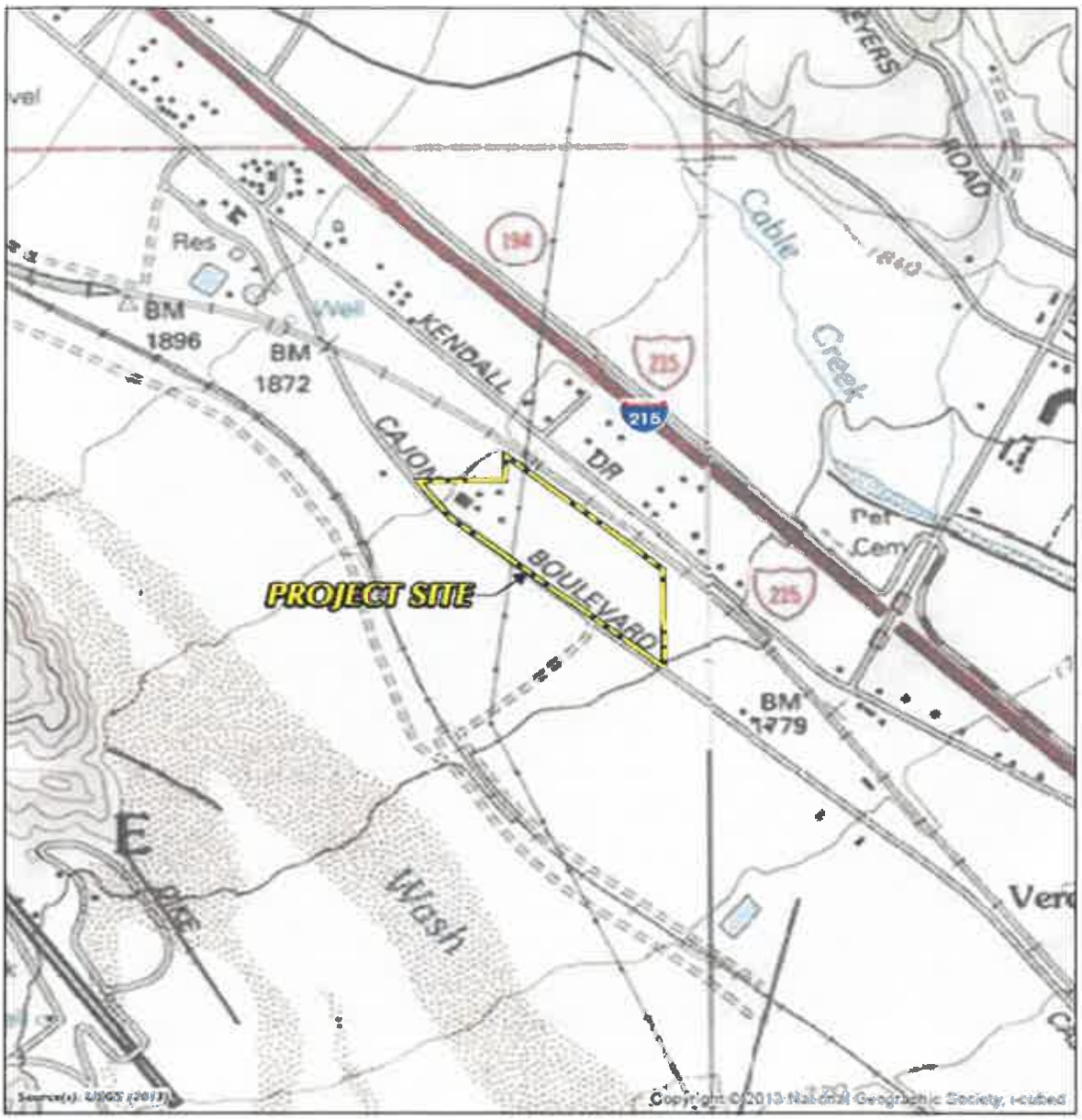


Figure 13

0 250 500 1,000 Feet

USGS Topographic Map

Figure 14 Site Photograph Key Map

Figure 14

0 100 200 400 Feet

Site Photograph Key Map

Figure 15 Site Photographs 1 & 2

East

Southeast

Site Photograph 1: From Cajon Boulevard looking East to Southeast.

Northwest

Southeast

Site Photograph 2: From Cajon Boulevard looking Northwest to Southeast.

Figure 15

Site Photographs 1 & 2

Figure 16 Site Photographs 3 & 4

Site Photograph 3: From Cajon Boulevard looking Northwest to Southeast.

Site Photograph 4: From Cajon Boulevard looking Northwest to Southeast.

Figure 16

Site Photographs 3 & 4

Figure 17 Site Photographs 5 & 6

Northwest

North

Site Photograph 5: From Cajon Boulevard looking Northwest to North.

South

Southwest

Site Photograph 6: From Kendall Drive looking South to Southwest.

Figure 17

Site Photographs 5 & 6

Site Access and Circulation

The Project site abuts Cajon Boulevard, a southeast-northwest oriented roadway. The Project site receives access from and provides access to Cajon Boulevard via two existing driveways located at the northwestern boundary of the site.

The Project site is located approximately 0.1-mile southwest of Interstate 215 (I-215), a north-south oriented freeway, and approximately 1.8 miles southeast of Interstate 15 (I-15), a north-south oriented freeway. Both I-215 and I-15 are part of the state highway system operated by the California Department of Transportation (CalTrans).

There are no bus or public transit facilities located along the Project site's frontage with Cajon Boulevard.

Air Quality and Climate

The Project site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego County line to the south. The SCAB is within the jurisdiction of South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and state air quality standards. The climate of the SCAB is characterized as semi-arid and more than 90% of the SCAB's rainfall occurs from November through April. During the dry season, which also coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, characterized by a daytime onshore sea breeze and a nighttime offshore drainage wind.

In the Project region, the SCAB does not attain State and/or federal standards established for one-hour and eight-hour Ozone (O_3) concentrations, particulate matter (PM_{10} and $PM_{2.5}$), and Lead (P_b) concentrations. Local air quality in the vicinity of the Project site has exceeded air quality standards for one-hour and eight-hour ozone concentrations and particulate matter concentrations within the last three years, as recorded at the nearest air monitoring station to the Project site (SCAQMD Southwest San Bernardino Valley monitoring station). (Urban Crossroads, 2018a, p. 12) Refer to Table 2-3 in the Project's air quality report (refer to *Technical Appendix A*) for a detailed summary of air quality conditions in the vicinity of the Project site over the last three years.

Air pollution contributes to human health concerns. The SCAQMD conducted an in-depth analysis of the toxic air contaminants and their resulting health risks for all of Southern California. This study, titled "Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV)," shows that the Project area has an ambient carcinogenic risk of 536.65 in one million persons (SCAQMD, n.d.). Information about specific air pollutants and their specific effects on human health are contained in the Air Quality Impact Analysis and Mobile Source Health Risk Assessment provided as *Technical Appendix A* and *Technical Appendix B*, respectively, to this MND.

Geology

There are no known active or potentially active earthquake faults on the Project site or in the immediate area, and the Project site is not located within an "Alquist-Priolo" Special Studies Zone (Norcal Engineering, 2017, p. 2). The closest active fault to the Project site, the San Jacinto fault, is located approximately 0.7-mile southwest from the Project site (CalTech, 2012). Similar to other properties

throughout Southern California, the Project site is located within a seismically active region and is subject to ground shaking during seismic events.

During subsurface investigations conducted on the Project site in 2017, no groundwater was encountered at any of the boring samples (up to 51.5 feet below existing ground surface) (Norcal Engineering, 2017, p. 8). Accordingly, the static groundwater table at the Project site is considered to exist at depths in excess of 51.5 feet below existing ground surface.

Soils

The Project site features fill and disturbed topsoils which generally extend to depths of one (1) to two (2) feet below the existing ground surface and consist of loose and dry, silty sand with gravel, small cobbles, roots, and minor debris. Native soils lie beneath the fill soils and consist of medium dense and dry to damp, slightly silty sand with gravel and small cobbles. Soil composition is relatively consistent across the Project site. (Norcal Engineering, 2017, p. 4).

Hydrology

The Project site is located in the Santa Ana River watershed, which drains an approximately 2,650 square-mile area and is the principal surface flow water body within the region. The Santa Ana River starts in the San Bernardino Mountains, approximately 1.5 miles northeast of the Project site, and flows southwesterly for approximately 96 miles across San Bernardino, Riverside, Los Angeles, and Orange counties before spilling into the Pacific Ocean.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06071C7910H, the Project site is located within "Flood Zone X (unshaded)" which corresponds with areas of minimal flood hazard (i.e., less than 0.2-percent annual chance of flood). (FEMA, n.d.)
Under existing conditions, storm water flows across the Project site as sheet flow in a southeasterly direction toward Cajon Boulevard. An existing 60-inch-diameter storm drain system (Line E-21) is located beneath Cajon Boulevard and is designed to capture and convey peak runoff within its master plan area during 100-year storm events. (Thienes, 2017a, n.p.)

Noise

Noise generated on or within the vicinity of the Project site under existing conditions is limited to the on-site gunite operation, vehicles travelling to and from the Project site along Cajon Boulevard, vehicles travelling along Kendall Drive, the railroad lines located west of the Project site, and the railroad lines abutting the northeastern boundary of the Project site, and periodic, routine maintenance activities on the Project site (i.e., discing). Based on 24-hour noise measurements collected by the consulting firm Urban Crossroads on February 14, 2018, hourly noise levels in the Project area range between 62.1 equivalent decibels (dBA Leq) and 74.7 dBA Leq (Urban Crossroads, 2018e, Table 5-1).

Utilities and Service Systems

The Project site is located in the service area of the City of San Bernardino Municipal Water Department (SBMWD) for domestic water and sewer service. The SBMWD manages the domestic water supply and delivery service within its 325-square mile service area. SBMWD's water supply is obtained from the State Water Project and various groundwater storages managed by the SBMWD. (WSC, 2016, p. 6-1)

Wastewater flows generated within the Project area are conveyed to and treated to secondary levels at the San Bernardino Regional Wastewater Reclamation Plant and to tertiary levels at the Rapid

Infiltration/Extraction (RIX) Plant. The Reclamation Plant and RIX Plant are both operated by the SBMWD (WSC, 2016, p. 7-11).

Solid waste collection and disposal in the Project area is conducted by the County of San Bernardino Solid Waste Management Division (SWMD). The SWMD contracts with Burrtec Waste Industries for disposal site operations and maintenance. (SB County, 2007b, IV-190) The Mid-Valley Landfill and/or San Timoteo Landfill would receive the solid waste produced from the Project site. (SWMD, 2015)

Vegetation

Under existing conditions, the northwestern portion of the site has been disturbed by past development activities on the subject property. Sections of the eastern portion of the Project site have been partially disturbed by weed abatement activities (i.e., discing for weed abatement and fire fuel management). There are a few trees and blocks of undisturbed vegetation within the eastern portion of the Project site. Three (3) vegetation communities/land cover types were identified on the Project site by L&L Environmental. The locations and extents of these vegetation communities are illustrated on Figure 18, *Existing Vegetation Map*, and summarized below:

- Alluvial Fan Sage Scrub (approximately 5.7 acres): Alluvial Fan Sage Scrub (AFSS), occurs along washes and drainages on low gradient alluvial fans and terraces that may be periodically or rarely flooded. Soils are usually sandy or rocky and well drained. AFSS has both the drought-deciduous, low-growing, soft-leaved shrubs of sage scrubs and the larger perennial species found in chaparral habitats, but the presence of scale broom is required. Although the habitat appears to qualify as AFSS with the presence of ≥1% scalebroom, very few scalebroom plants were observed in the survey area. The lack of periodic flooding and scouring on the Project site has resulted in a transition from AFSS on-site to California buckwheat scrub. (L&L Environmental, 2018a, pp. 19-20)
- Developed Land (approximately 7.2 acres): Developed areas consist of hardtops of asphalt or gravel and are devoid of any vegetation. These areas are heavily used by commercial and/or passenger vehicles. (L&L Environmental, 2018a, p. 20)
- Disturbed (approximately 8.3 acres): Disturbed habitat is habitat has been previously and/or repeatedly disturbed but where native plants are still present in small numbers and soils are open and sandy. (L&L Environmental, 2018a, p. 20)

No special-status plant species were identified on Project site during surveys conducted by L&L Environmental (L&L Environmental, 2018a, p. 21). For more information pertaining to on-site vegetation refer to *Technical Appendix C1*.

Wildlife

L&L Environmental observed 32 wildlife species on or within the vicinity of the Project site. No special-status wildlife species were observed on Project site; but, two (2) sensitive wildlife species were observed/trapped on-site: the Los Angeles pocket mouse and the California horned lark. (L&L Environmental, 2018a, pp. 24, 26, 31). For a detailed summary of the wildlife species observed on-site refer to *Technical Appendix C1*.

Figure 18 Existing Vegetation Map

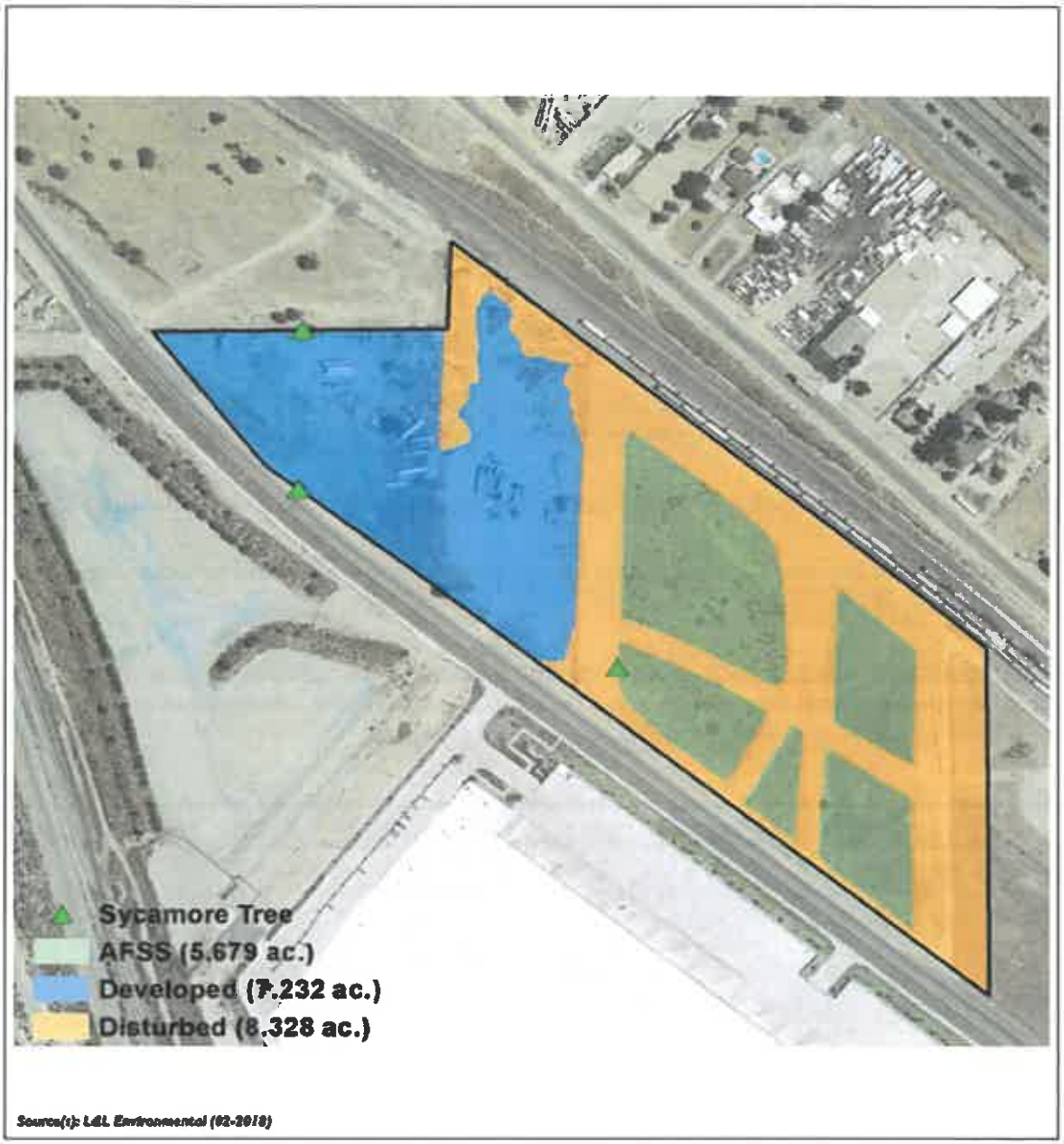


Figure 18

NOT TO SCALE

Existing Vegetation Map

EVALUATION FORMAT:

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 16000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. The project is evaluated based upon its effect on 19 major categories of environmental factors. Each factor in the Initial Study Checklist is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The effect of the project is categorized into one of the following four categories of possible determinations:

- Potentially Significant Impact
- Less than Significant Impact with Mitigation
- Less than Significant Impact
- No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact:** No impacts are identified or anticipated and no mitigation measures are required.

2. **Less-than-Significant Impact:** No substantial adverse impacts are identified or anticipated and no mitigation measures are required.

3. **Less-than-Significant Impact with Mitigation Incorporated:** A substantial adverse impact is identified or anticipated; but, the application of mitigation measure(s) would avoid or mitigate the effects to a point where clearly no significant impact would occur.

4. **Potentially Significant Impact:** A substantial adverse impacts is identified or anticipated for which adequate mitigation may not be feasible. An Environmental Impact Report (EIR) is required to evaluate these impacts.

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

DETERMINATION:

On the basis of this initial evaluation, the following finding is made:

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	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.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	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.
☐	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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Aron Liang 11/19/2018
Signature (prepared by): Aron Liang, Senior Planner Date

11/19/2018
Signature: Dave Prusch, Supervising Planner Date

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS				
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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
SUBSTANTIATION: Check ☐ if project is located within the view-shed of any Scenic Route listed in the General Plan.				

I-a) **Less-than-Significant Impact.** The San Bernardino County General Plan does not designate specific scenic vistas throughout the County; however, General Plan Policy OS 5.1 states that a scenic resource includes "vista[s] that provide relief from less attractive views of nearby features (such as views of mountain backdrops from urban areas)" (SB County, 2007a, pp. VI-12 - VI-13). The Project site is located in a relatively flat valley floor approximately 1.4 miles southwest of the foothills of the San Bernardino Mountains, 0.8-mile east of the Glen Helen foothills, and 2.0 miles southeast of the foothills of the San Gabriel Mountains. Under existing conditions, prominent views of the San Bernardino Mountains are available within areas adjacent to the Project site on Cajon Boulevard and Kendall Drive (looking east) and prominent views of the Glen Helen foothills and San Gabriel mountains are available from Cajon Boulevard and Kendall Drive (looking northwest). Refer to Figure 15 through Figure 17 for existing views in the Project site area.

The proposed warehouse facility would be constructed to a maximum height of approximately 46 feet, which would partially and momentarily obstruct or obscure views of the San Bernardino Mountains provided to vehicles and pedestrians traveling on Cajon Boulevard along a portion of the Project site's frontage. Additionally, the proposed warehouse facility would partially obstruct or obscure views of the Glen Helen foothills and/or San Gabriel Mountains for vehicles and pedestrians traveling on Kendall Drive and from non-conforming residences fronting Kendall Drive. Notwithstanding the potentially-obstructed views, neither the San Bernardino County General Plan nor the Glen Helen Specific Plan identify the Project site as being located within a scenic vista or within a scenic corridor and viewshed of the San Bernardino Mountains, Glen Helen foothills, or San Gabriel Mountains. Views of these features are not views unique to the Project site or surrounding area. Views to these landforms would remain available in the vicinity of the Project site and surrounding area.

Accordingly, implementation of the proposed Project would not have a substantial effect on a designated or unique scenic vista. Thus, a less-than-significant impact would occur.

I-b) **Less-than-Significant Impact.** The Project site does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings. There are no State-designated or eligible scenic highways within the vicinity of the Project site (CalTrans, 2017). Accordingly, the Project site is not located within a state scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor. Thus, a less-than-significant impact would occur.

The Project site is located approximately 0.13-mile (675 feet) west of Interstate 215, which the County General Plan and Glen Helen Specific Plan recognize as a "Scenic Route" (Glen Helen Specific Plan, Page 1-17) However, the Project site is located outside of the I-215 Scenic Corridor defined by the Glen Helen Specific Plan (which only extends 600 feet west of I-215) (Glen Helen Specific Plan, Page 2-114.)

I-c) **Less-than-Significant Impact.** Under existing conditions, the Project site and the surrounding area consist entirely of developed or under-developed/disturbed land. The areas immediately south and southwest of the Project site contain industrial and warehouse buildings with associated parking lots, drive aisles, and landscaping. The properties immediately southeast and northwest of the Project site contain undeveloped/underutilized land that have been disturbed during weed abatement activities. The properties immediately north and northeast of the Project site (beyond the railroad lines) contain non-conforming single-family homes, and rural commercial businesses. Lastly, the property northwest of the Project site contains a junkyard. Implementation of the Project would convert land that was previously used as a lumber mill and partially, currently used for parking and a sprayed concrete gunite business to one warehouse building and associated loading docks, parking spaces, drive aisles, utility infrastructure, landscaping, exterior lighting and signage.

The Project's construction phase would occur over approximately eight months. All Project-related construction activities would be temporary in nature and all construction equipment would be removed from the Project site following completion of the Project's construction activities. Project-related changes to local visual character would be less than significant during near-term construction activities because construction activity is common throughout San Bernardino County, would be temporary in nature, and would not substantially degrade the visual quality or character of the area, which currently contains a junkyard, warehouse buildings, railroad lines, disturbed vacant land, and non-conforming residential uses.

The Project site is located in an area of San Bernardino County that is developing with distribution warehousing, e-commerce, and light industrial land uses. The development proposed by the Project is similar in nature to the warehouse developments located to the south and southwest of the Project site. Therefore, while the proposed Project would alter the visual character of the site, due to its similarity to the existing character of other large buildings in the surrounding area, such an alteration would not result in a substantial degradation to the existing visual character. The Project's impacts to visual character would be less than significant.

Although aesthetic changes to the Project site would occur as compared to existing conditions, the Project incorporates a number of features to enhance the aesthetic quality of the Project. The Project's architecture incorporates a color palette that would not be visually offensive and also incorporates accent elements, such as colored glass and decorative building elements, for visual interest. The Project's landscape plan incorporates plant species that can maintain vibrancy during drought conditions. Additionally, the proposed facility includes loading docks and truck parking areas that are set back from public streets and enclosed by a solid screen wall. The Project's visual features complement surrounding development and would be consistent with the design standards for industrial development provided by the Glen Helen Specific Plan (GHSP). Based on the foregoing, the Project's impacts to visual quality would be less than significant.

I-d) **Less-than-Significant Impact.** Under existing conditions, the Project site generates a negligible amount of glare. Existing artificial lights on the Project site come from flood lights found near storage trailers used by the on-site sprayed concrete operation. Streetlights are present along a portion of Cajon Boulevard that abuts the Project site's southwestern boundary. There are no streetlights located along Kendall Drive or other light features along the railroad lines, which abut the Project site's northeastern boundary.

The proposed Project would include exterior lighting; however, the installation of exterior lighting would be ancillary to the proposed warehouse building. The proposed Project would be required to adhere to the lighting requirements as set forth in the GHSP and the County of San Bernardino Development Code. The GHSP includes standards for lighting of properties within the GHSP's boundaries as follows: exterior lighting shall be "arranged to prevent glare and illumination on streets or adjoining property" and shall be "shielded and focused to minimize spill light into the night sky." (SB County, 2015, p. 3-45) Additionally, County of San Bernardino Development Code § 83.07.030 requires that outdoor lighting for commercial or industrial land uses to be fully shielded to preclude light pollution or light trespass. The County's Development Code also specifies that exterior lighting associated with nonresidential uses shall not blink, flash, oscillate, or be of unusually high intensity or brightness. The Project would be required to demonstrate compliance with the aforementioned requirements prior to issuance of building permits. Project compliance with the GHSP's lighting requirements and the County of San Bernardino Develoment Code would ensure that the Project would not produce a new source of substantial light or glare from artificial lighting sources that would adversely affect day or nighttime views in the area.

The proposed Project would involve the construction of one (1) warehouse building with exterior building surfaces that consist of concrete tilt-up panels and blue-glazed glass. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of any surrounding properties, including motorists on adjacent roadways, because the glass used by the Project would be low-reflective. Areas proposed for window glazing would be limited, as shown on the Project's application materials. Accordingly, a less-than-significant daytime glare impact would occur.

The Project does not propose to install rooftop solar panels; however, the roof of the proposed warehouse building could accommodate the potential future installation of solar panels.

Because solar panels absorb light – and do not reflect it – they are not expected to result in substantial adverse glare effects. In the event solar panels are installed on the proposed warehouse building in the future, potential glare impacts would be less than significant.

Based on the foregoing analysis, the proposed Project would not create a new source of substantial light or glare and would not adversely affect daytime or nighttime views of the area. Impacts would be less than significant.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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(9)), 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 loss of forest land or conversion of forest land 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?	☐	☐	☐	☒
SUBSTANTIATION: Check ☐ if project is located in the Important Farmlands Overlay.				

II-a) **No Impact.** According to Farmland Mapping and Monitoring Program mapping information available from the California Department of Conservation (DOC), the Project site does not contain any soils mapped by the Department of Conservation as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance." (DOC, 2016a) As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. No impact would occur.

II-b) **No Impact.** The Project site is zoned for "Heavy Industrial (HI)" land uses. There are no properties zoned for agricultural land uses in the Project vicinity. (SB County, 2015; SB County, 2010a) Therefore, implementation of the Project has no potential to conflict with existing zoning for an agricultural use.

As disclosed by mapping information from the California DOC, neither the Project site nor any land in the site's vicinity are under a Williamson Act Contract (DOC, 2016b). As such, no impact would occur.

II-c) **No Impact.** The Project site is zoned for "Heavy Industrial (HI)" uses and is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land. The nearest County- and Nationally-designated forest land is located approximately 1.1-mile northeast of the Project site. (SB County, 2010a). Due to the Project's distance to the nearest forest land and the land uses proposed by the Project being consistent with the site's zoning designation, the Project has no potential to conflict with any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. As such, no impact would occur.

II-d) **No Impact.** The Project site does not contain a forest and is not designated as forest land; thus, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use (SB County, 2010a). As such, no impact would occur.

II-e) **No Impact.** "Farmland" is defined in Section II(a) of Appendix G of the CEQA Guidelines to mean "Prime Farmland," "Unique Farmland" or "Farmland of Statewide Importance." According to the DOC, the Project site does not contain any Farmland but does contain lands classified as "Farmland of Local Importance." Although the Project site is classified as "Farmland of Local Importance" by the DOC, the Project site has not been used for agricultural production (based on a review of records dating to 1896) and the quality/productivity of on-site soils are only classified as "fair" (based on the California Storie Index and the USDA Land Capability Class rating (SCS Engineers, 2017, pp. 7-8; UC Davis, n.d.). The Project site does not contain any soils mapped by the DOC as "Farmland." Additionally, as described above in the responses to Thresholds II-c and II-d, the Project site is located 1.1-mile to the nearest forest lands and is not designated for forest land uses. Thus, implementation of the Project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	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 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) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
SUBSTANTIATION:				

An *Air Quality Impact Analysis* and a *Mobile Source Health Risk Assessment* were prepared for the Project by Urban Crossroads, Inc. to evaluate potential criteria and hazardous air pollutant emissions that could result from the Project's construction and operation. These reports are included as *Technical Appendices A* and *B*, respectively, to this Initial Study and their findings are incorporated into the analysis presented herein.

III-a) **Less-than-Significant Impact.** The Project site is located within the South Coast Air Basin (SCAB or "Basin"). The SCAB encompasses approximately 6,745 square miles and includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, State and federal air quality standards are exceeded in most parts of the Basin. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP, the 2016 AQMP, was adopted by SCAQMD in March 2017 and the Project's consistency with the 2016

AQMP is discussed below. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). The Project's consistency with these criteria is discussed below.

Consistency Criterion No. 1: The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As evaluated under Thresholds III-b, III-c, and III-d, below, the Project would not exceed regional or localized significance thresholds for any criteria pollutant during construction or during long-term operation with the application of mandatory regulatory requirements. Therefore, the Project would not violate either the CAAQS or NAAQS. Accordingly, the Project's regional and localized emissions would not contribute substantially to an existing or potential future air quality violation or delay the attainment of air quality standards.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The growth forecasts used in the AQMP to calculate future emissions levels are based in part on land use data provided by lead agency general plan documentation. Projects that increase the intensity of use on a subject property may, as compared to its General Plan designation, result in increased stationary area source emissions and/or vehicle source emissions when compared to the AQMP assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the AQMP. The prevailing planning document for the Project site is the Glen Helen Specific Plan, which designates the Project site for Heavy Industrial (HI) land use. The Project does not propose a Specific Plan Amendment and the Project's proposed features would be consistent with the HI development standards enforced by the Glen Helen Specific Plan. As such, the Project would not exceed the assumptions of the AQMP.

For the reasons stated above, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Furthermore, the Project would not exceed the growth assumptions in the AQMP. As such, the Project would be consistent with the AQMP and impacts would be less-than-significant.

III-b) **Less-than-Significant Impact.** The proposed Project has the potential to generate substantial pollutant concentrations during both construction activities and long-term operation. The following analysis is based on the applicable significance thresholds established by the SCAQMD (which are based on Federal and State air quality standards). This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including: SCAQMD Rule 403, "Fugitive Dust;" SCAQMD Rule

431.2, "Sulfur Content of Liquid Fuels;" SCAQMD Rule 1113, "Architectural Coatings;" SCAQMD Rule 1186, "PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations;" SCAQMD Rule 1186.1, "Less-Polluting Street Sweepers," and Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations "Airborne Toxic Control Measure." For a detailed description of the health effects of air pollutants refer to Section 2.6 of the Project's Air Quality Report (*Technical Appendix A*). In general, air pollutants have adverse effects to human health, including but not limited to, respiratory illness and carcinogenic effects.

Impact Analysis for Construction Emissions

For purposes of this analysis, construction is expected to begin in August 2018 and end in April 2019. If construction activities actually occur at a later date than assumed by this analysis, emissions associated with construction vehicle exhaust would be less than disclosed herein due to the implementation and enforcement of progressively more restrictive regulatory requirements for construction equipment and the ongoing replacement of older construction fleet equipment with newer, less-polluting equipment by construction contractors, as accounted for by the California Emissions Estimator Model (CalEEMod) (Urban Crossroads, 2018a, p. 31). The Project's construction characteristics and construction equipment fleet assumptions used in the analysis are provided in Table 3-3 of the Project's Air Quality Impact Analysis (*Technical Appendix A*) report. The calculated maximum daily emissions associated with Project construction are presented in Table 1, *Summary of Construction Emissions*.

Table 1 Summary of Construction Emissions

Year	Emissions (pounds per day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
2018	6.18	71.78	36.66	0.09	11.19	6.89
2019	69.33	69.39	51.23	0.13	6.89	3.79
Max Daily Emissions	**69.33**	**71.78**	**51.23**	**0.13**	**11.19**	**6.89**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2018a, p. 31, Table 3-4)

As shown in Table 1, Project-related daily construction emissions of volatile organic compounds (VOCs), nitrogen oxides (NOx) carbon monoxide (CO), sulfur oxides (SOx), and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or cumulatively considerable basis. Impacts associated with construction-related emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would be less than significant and mitigation is not required.

Impact Analysis for Operational Emissions

Operational activities associated with the Project are expected to generate air pollutant emissions from the operation of motor vehicles (including trucks), landscape maintenance activities, application of architectural coatings, and the use of electricity and natural gas. Long

term operational emissions associated with the Project are presented in Table 2, *Summary of Peak Operational Emissions*.

Table 2 Summary of Peak Operational Emissions

Operational Activities: Summer Scenario	**Emissions (pounds per day)**					
	VOC	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area Source	7.30	9.00E-04	0.10	1.00E-05	3.50E-04	3.50E-04
Energy Source	0.02	0.18	0.15	1.05E-03	0.01	0.01
Mobile (Passenger Cars)	0.78	1.12	15.81	0.05	5.67	1.52
Mobile (Trucks)	1.24	37.93	8.69	0.13	4.28	1.40
Total Maximum Daily Emissions	**9.33**	**39.23**	**24.74**	**0.18**	**9.97**	**2.94**
SCAQMD Regional Threshold	55	55	550	150	150	55
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	7.30	9.00E-04	0.10	1.00E-05	3.50E-04	3.50E-04
Energy Source	0.02	0.18	0.15	1.05E-03	0.01	0.01
Mobile (Passenger Cars)	0.64	1.17	12.74	0.05	5.67	1.52
Mobile (Trucks)	1.26	38.93	9.05	0.13	4.28	1.40
Total Maximum Daily Emissions	**9.21**	**40.28**	**22.03**	**0.18**	**9.97**	**2.94**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2018a, p. 31, Table 3-5)

As summarized in Table 2, Project-related operational emissions of VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation. Impacts associated with long-term emissions of VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would be less than significant.

In conclusion, the Project would not violate or contribute substantially to an existing or projected air quality violation during construction or operation. Impacts would be less than significant.

III-c) **Less-than-Significant Impact.** SCAQMD considers air pollutant emissions that exceed the SCAQMD's project-level thresholds also to be cumulatively considerable. Conversely, if a project does not exceed the SCAQMD project-level thresholds, then SCAQMD considers that project's air pollutant emissions to be less than cumulatively considerable. The evaluation of Project-specific air pollutant emissions presented under Threshold III-b demonstrates that the Project would not exceed any applicable thresholds that are designed to assist the region in attaining the applicable State and national air quality standards; therefore, the Project's air emissions would be less than cumulatively considerable and would not contribute to the non-attainment of applicable State and federal standards after mitigation.

III-d) **Less-than-Significant Impact.** The following provides an analysis of the Project's potential to expose sensitive receptors in the immediate vicinity of the Project site to substantial pollutant concentrations during Project construction and long-term operation. For a detailed description of the health effects of air pollutants refer to Section 2.6 of the Project's Air Quality Report (*Technical Appendix A*). In summary, air pollutants have adverse effects to human health, including but not limited to, respiratory illness and carcinogenic effects. The following analysis is based on the applicable significance thresholds established by the SCAQMD.

Impact Analysis for Construction Localized Emissions

As summarized in Table 3, *Summary of Construction Localized Emissions*, the Project would not exceed the SCAQMD's localized significance threshold for any criteria pollutants during construction. Impacts would be less than significant.

Table 3 Summary of Construction Localized Emissions

On-Site Site Preparation Emissions	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	71.70	23.76	10.99	6.83
SCAQMD Localized Threshold	291	2,804	45	12
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
On-Site Grading Emissions	**Emissions (pounds per day)**			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	71.27	35.73	6.70	4.12
SCAQMD Localized Threshold	291	2,804	45	12
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2018a, p. 31, Table 3-5)

Impact Analysis for Operational Localized Emissions

The Project's estimated operational localized emissions are presented in Table 4, *Summary of Operational Localized Emissions*. As shown, the Project's calculated long-term operational emissions would not exceed the localized thresholds established by the SCAMQD. Accordingly, long-term operation of the Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Table 4 Summary of Operational Localized Emissions

Operational Activity	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**2.13**	**1.47**	**0.51**	**0.16**
SCAQMD Localized Threshold	302	2,396	11	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2018a, p. 31, Table 3-8)

Impact Analysis for CO "Hot Spots"

Localized areas where ambient CO concentrations exceed the CAAQS and/or NAAQS are termed CO "hot spots." Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind)

atmospheric conditions. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations.

For purposes of providing a conservative, worst-case impact analysis, the Project's potential to cause or contribute to CO hotspots was evaluated by comparing the study area intersections that would receive Project traffic (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. In the 2003 AQMP, the SCAQMD evaluated CO concentrations at four (4) busy intersections in the City of Los Angeles that were determined to be the most congested intersections in the SCAB. Each of the evaluated intersections were primary thoroughfares, some of which were located near major freeway on/off ramps, and experienced traffic volumes of approximately 100,000 vehicles per day. The SCAQMD's analysis at these busy intersections did not identify any CO hotspots. Based on an analysis of the intersections in the Project's study area, Urban Crossroads determined that, with the addition of the Project, none of the intersections in the Project's study area would be subject to the extreme traffic volumes and vehicle congestion of the intersections modeled by the SCAQMD in the 2003 AQMP. (Urban Crossroads, 2018a, pp. 44-45) Therefore, Project-related vehicular emissions would not create a CO hot spot and would not substantially contribute to an existing or projected CO hot spot. Impacts would be less than significant.

Impact Analysis for Diesel Particulate Emissions

Diesel-fueled trucks would travel to/from the Project site during operation of the Project. Diesel trucks produce diesel particulate matter (DPM), which is known to be associated with health hazards, including cancer. According to the SCAQMD's MATES IV study, the background excess cancer risk in the Project area is calculated to be 536.65 in one million. In order for a project to have a cumulatively considerable effect. The SCAQMD determined that it must increase cancer risk by 10 or more in one million (SCAQMD, n.d.). To evaluate the Project's potential to expose nearby sensitive receptors to substantial amounts of DPM during long-term operation, a Mobile Source Health Risk Assessment was prepared for the proposed Project (*Technical Appendix B*). Project-related DPM health risks were evaluated under three (3) receptor scenarios, which are summarized below. Detailed air dispersion model outputs and risk calculations are presented in Appendices 2.1 and 2.2, respectively, of *Technical Appendix B*.

At the maximally exposed individual receptor (MEIR) – the residential land use located approximately 292 feet north of the Project site (on Kendall Drive) – the maximum excess cancer risk attributable to the proposed Project's DPM emissions is calculated to be 1.25 in one million. The cancer risk attributable to the Project at the MEIR (i.e., 1.25 in one million) would not exceed the SCAQMD cancer risk threshold of 10 in one million. At this same receptor location, the non-cancer health risk index attributable to the proposed Project would be 0.0005, which would not exceed the SCAQMD non-cancer health risk index of 1.0. (Urban Crossroads, 2018b, p. 1) Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively considerable manner to the exposure of residential receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact.

At the maximally exposed individual worker (MEIW), identified as the Coastal Metals facility located 675 feet southeast of the Project site (on Cajon Boulevard), the maximum excess cancer risk attributable to the proposed Project's DPM emissions is calculated to be 0.13, which would not exceed the SCAQMD cancer risk threshold of 10 in one million. At this same receptor location, the non-cancer health risk index attributable to the proposed Project would be 0.0004, which would not exceed the SCAQMD non-cancer health risk index of 1.0. (Urban Crossroads, 2018b, p. 1) Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively considerable manner to the exposure of nearby workers to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact.

At the maximally exposed individual school child (MEISC), identified as Cesar Chavez Middle School and North Verdemont Elementary School located approximately 3,112 feet and 3,181 feet northeast of the Project site, respectively, the maximum excess cancer risk attributable to the proposed Project is calculated to be 0.04 in one million and the non-cancer health risk index attributable to the proposed Project's DPM emissions would be 0.00008. Both the estimated excess cancer risk and non-cancer health risk index would not exceed SCAQMD thresholds of significance (10 in one million and 1.0, respectively). (Urban Crossroads, 2018b, p. 1) Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively considerable manner to the exposure of nearby school child receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact.

III-e) **Less-than-Significant Impact.** The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. (Urban Crossroads, 2018a, pp. 1-2) Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

During long-term operation, the proposed Project would include warehouse distribution land uses, which are not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project's long-term operational use could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding any significant odor impact. Furthermore, the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. (Urban Crossroads, 2018a, pp. 1-2) As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	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 Wildlife or U. S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantially 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 resident or migratory fish or wildlife species or with established native resident 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 Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
SUBSTANTIATION: Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ☒: Biological Resources Overlay				

A *Biological Assessment, Botanical and Burrowing Owl Survey* report and a *San Bernardino Kangaroo Rat Trapping Study* were prepared for the Project by L&L Environmental, Inc. and Natural Resources Assessment, Inc., to identify any potential impacts that could occur to biological resources as a result of the Project. The reports summarize the results from records searches and field visits to document current site conditions and habitat suitability for sensitive and common and rare biological species. These reports are included as *Technical Appendices C1* and *C2*, respectively, to this Initial Study and their findings are incorporated into the analysis presented herein.

IV-a) **Less-than-Significant Impact with Mitigation Incorporated.** No candidate, sensitive, or special-status botanical species were observed on the Project site during a general field survey conducted by L&L Environmental in late 2017 or focused botanical species conducted by L&L Environmental in the spring and summer of 2018. (L&L Environmental, 2018a, pp. 21-23) Accordingly, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any important, rare, or protected botanical species.

No candidate or special-status wildlife species were observed on the Project site by L&L Environmental during field surveys conducted in 2017 and 2018. Two (2) sensitive wildlife species were observed on-site, the Los Angeles pocket mouse and the California horned lark, and six (6) additional sensitive species were determined to have a moderate potential to occur on the Project site: California glossy snake, red-diamond rattlesnake, coast horned lizard, Southern California rufous-crowned sparrow, Bell's sage sparrow, Crotch bumble bee, and burrowing owl. L&L Environmental determined that the Project's impacts to the above-listed wildlife species, with the exception of the burrowing owl, would be less than significant because these species are relatively common in California and the Project would not remove a substantial amount of habitat or range from any of these species. Although the burrowing owl was not observed on the Project site during focused surveys conducted in 2018, the species is nomadic and has the potential to occupy the site prior to the initiation of construction activities. Should the burrowing owl occupy the Project site at the time of construction, a significant impact would occur and mitigation would be required (see MM BR-1). (L&L Environmental, 2018a, pp. 24-34, 45)

MM BR-1 would reduce potential impacts to the burrowing owl to less-than-significant levels by ensuring that surveys are conducted to determine the presence or absence of the burrowing owl on the Project site prior to the commencement of construction activities. If the burrowing owl is present on the Project site at the time of construction, MM BR-1 establishes performance criteria that require avoidance and/or relocation of the species in accordance with accepted protocols.

IV-b) **Less-than-Significant Impact.** According to a field survey conducted in late 2017 by L&L Environmental (included in *Technical Appendix C1*), no riparian habitats were found on or adjacent to the Project site (L&L Environmental, 2018a, p. 35). Approximately 5.7 acres of Alluvial Fan Sage Scrub (AFSS) was found on-site and is considered a special status habitat by the California Natural Diversity Database (CNDDB). Notwithstanding, L&L Environmental concluded that although AFSS habitat is present on-site, the habitat has been isolated from similar or native habitats and, based on a lack of flooding and scouring, the habitat is transitioning into a non-sensitive, upland vegetation community. (L&L Environmental, 2018a, pp. 19-20) Accordingly, there is no potential for the Project to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Wildlife Service. A less-than-significant impact would occur.

IV-c) **No Impact.** According to a field survey conducted in late 2017 by L&L Environmental, the Project site does not contain any protected wetland or aquatic resources, including but not limited to, natural drainages or water courses, wetland habitat, marsh, vernal pool, or coastal resources (L&L Environmental, 2018a, p. 35). Therefore, the Project would not result in a substantial adverse effect on federally protected wetlands as defined by Section 404 of the

Clean Water Act through direct removal, filling, hydrological interruption, or other means. No impact would occur and mitigation is not required.

IV-d) **Less-than-Significant Impact with Mitigation Incorporated.** According to a field survey conducted in late 2017 by L&L Environmental, the survey area supports some native habitat; however, this habitat is separated from other native habitats by varied levels of disturbance and development and does not provide a wildlife movement corridor (L&L Environmental, 2018a, pp. 35-36). In addition, there are no natural water bodies on the Project site; therefore, there is no potential for the Project to interfere with the movement of fish. There are also no native wildlife nurseries on-site. Therefore, there is no potential for the Project to impede the use of a native wildlife nursery site. No impact would occur.

L&L Environmental concluded that there were individual trees and large bushes present in the survey area that could provide for bird roosting, perching, and nesting (L&L Environmental, 2018a, p. 35). The Project would result in removal of trees and low-lying vegetation across the Project site that have the potential to support nesting migratory birds that are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code and, out of an abundance of caution, this Initial Study concludes the Project's potential to impact nesting birds and migratory birds is a significant direct impact for which mitigation is required.

MM BR-2 would reduce potential impacts nesting migratory birds to less-than-significant levels by ensuring that surveys are conducted to determine the presence or absence of protected nesting bird species on the Project site prior to the commencement of construction activities. If protected nesting bird species are present on the Project site at the time of construction, the mitigation measure provides performance criteria that requires avoidance and/or relocation of the species in accordance with accepted protocols.

IV-e) **Less-than-Significant Impact.** The removal of trees on the Project site would be subject to Chapter 88.01 of the San Bernardino County Development Code which contains guidelines and regulations related to the protection and management of plant species (SB County, 2018, § 88.01). Mandatory compliance with standard regulatory requirements would preclude any potentially significant impacts caused by conflict with local policies or ordinances protecting trees. Therefore, impacts would be less than significant.

The County of San Bernardino does not have any additional policies or ordinances in place to protect biological resources that are applicable to the Project.

IV-f) **No Impact.** There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan applicable to the Project site. Accordingly, the Project would not conflict with any such plan, and no impact would occur.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of Project approval to reduce these impacts to a level considered less than significant:

MM BR-1: Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the County of San Bernardino prior to the issuance of a grading permit and subject to the following provisions:

a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction.

b) In the event that the pre-construction survey identifies the presence of the burrowing owl on the Project site, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

MM BR-2: Vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (January 1 through September 1), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a) A migratory bird nesting survey of the Project site, including suitable habitat within a 500-foot radius, shall be conducted by a qualified biologist within three (3) days prior to initiating vegetation clearing or ground disturbance.

b) A copy of the migratory nesting bird survey results report shall be provided to the County of San Bernardino. If the survey identifies the presence of active nests, then the qualified biologist shall provide the County with a copy of maps showing the location of all nests and a species-appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the County and shall be no less than a 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist with County concurrence verify that the nests are no longer occupied and juvenile birds can survive independently from the nests.

Although the Project would not result in substantial adverse indirect effects to biological resources, the following mitigation measures are recommended to minimize the Project's potential indirect impacts to sensitive biological habitats and/or species.

MM BR-3: Prior to the initiation of construction activities, the perimeter of the Project's work area shall be fenced with highly visible fencing (e.g., orange construction fencing) to ensure impacts do not occur outside of the Project footprint.

MM BR-4: All off-road equipment shall be washed, particularly the wheels and under carriage, prior to transport to the Project site to prevent the spread of weedy plant species.

MM BR-5: Staging areas shall be placed in areas that have been previously disturbed and do not show an infestation of non-native plant species. Staging areas shall be maintained in a weed/noxious weed-free condition.

MM BR-6: All refuse created or brought on-site must be placed in covered containers, removed from the site at regular intervals, and properly disposed.

ENVIRONMENTAL ISSUE AREAS EXAMINED	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 as defined in Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
SUBSTANTIATION: Check if the project is located in the Cultural ☐ or Paleontological ☐ Resources overlays or cite results of cultural resource review.				

A *Phase 1 Prehistoric Archaeological Resources Assessment* and *Historic Archaeological Resources Assessment* were prepared for the Project by L&L Environmental, Inc. to identify potential archaeological and historical resources that may be affected by the proposed Project. These reports include the findings from an archaeological pedestrian survey; a cultural records search and sacred lands search and an inventory of all recorded archaeological and historical resources located on the Project site and within a one-mile radius of the Project site. These reports are included as *Technical Appendices D1* and *D2*, respectively, to this Initial Study and their findings are incorporated into the analysis presented herein.

V-a) **Less than Significant Impact with Mitigation Incorporated.** Based on a field survey and archival records search conducted by L&L Environmental, the Project site is located in an area of San Bernardino County with high historic resources sensitivity and five historic resources, as described below, were identified on or abutting the Project site.

The segment of Cajon Boulevard that abuts the Project comprises a segment of historic Route 66. Although the entire length of Route 66 was determined to be eligible for listing on the National Register of Historic Places (NRHP) in the 1990s, the segment abutting the Project site had never been formally evaluated or nominated for listing. L&L Environmental's evaluation concluded that the segment of Cajon Boulevard that abuts the Project site retains the integrity of location, setting, feeling, design, and association from Route 66's period of historic significance (between 1926 through the late 1950s). As a standard condition of approval, the Project will be required to construct improvements to Cajon Boulevard along the Project site's frontage, including pavement within the travel way, curb and gutter, sidewalk, and landscaping. Mitigation will be required to ensure that improvements to Cajon Boulevard do not adversely affect the historic character of Route 66. (L&L Environmental, 2018c, pp. 49-53, 57-58) The Project would be required to implement MM CR-1 through MM CR-3 to recognize the historic importance of Route 66 and enhance the visual quality along the roadway corridor. With implementation MM CR-1 through MM CR-3, the Project's potential

impacts to the historical significance of Route 66 would be reduced to less-than-significant levels.

Under existing conditions, the Project site contains two steel H-frame transmission line towers for overhead electrical lines. The H-frame towers located on the Project site were constructed circa 1930-1931 and are associated with a historic 225-mile transmission line extending from San Bernardino, California to Boulder City, Nevada to supply electrical power for the construction of the Boulder Dam (later re-named Hoover Dam). The transmission line towers on the Project site represent two of the more than 1,600 towers that comprised the historic transmission line and, to-date, many of the historic transmission towers have been replaced with modern towers. (There are no historic transmission line towers visible south of Cajon Boulevard; but, there are five such towers visible off-site from Kendall Drive looking north.) The Project would not modify or physically impact either of the transmission line towers on the Project site and would provide a minimum 25-foot buffer around each tower during construction and operation. Regardless, L&L Environmental determined that the Project would adversely affect the visual integrity of the historic transmission line corridor because the proposed warehouse building would partially, and briefly, block views of the towers from traffic traveling west on Cajon Boulevard and because vehicles parked within the transmission line easement – if approved by Southern California Edison – would detract from views of the towers. The impacts to the visual integrity of the historic transmission line towers on-site are determined to be significant and mitigation is required. (L&L Environmental, 2018c, pp. 37-39, 47-49) The Project would be required to implement MM CR-4 through MM CR-7 to protect the historical significance of the historic transmission line towers. MM CR-4 would ensure the transmission line towers are protected from potential damage during construction activities. MM CR-5 through MM CR-7 would protect the visual quality and character of the transmission line easement while also educating visitors to the significance of the transmission lines. With implementation MM CR-4 through MM CR-7, the Project's potential impacts to the historical significance of the on-site electrical transmission line towers would be reduced to less-than-significant levels.

The northern portion of the Project site contained a lumber mill business from 1957 through 2005. L&L Environmental observed two concrete foundations, a silo sheet metal funnel, bendable stove pipe, a metal bed frame, and miscellaneous debris (wood fragments, sheet metal strips, and unidentifiable debris) on the northern portion of the Project site that appeared to be associated with historic operations at the on-site lumber mill. The concrete foundations were observed to be in good condition, all other observed resources are deteriorating due to exposure to natural elements. None of the resources observed on-site contain any extraordinary character, marks, or features, nor was the historic lumber mill operation connected to any events or persons that have significantly contributed to the history of California. Based on the foregoing, L&L Environmental determined that impacts to the historic artifacts present on the northern portion of the Project site would be less than significant. (L&L Environmental, 2018c, pp. 33-36, 45-47)

Three isolated historic artifacts were observed on the Project site: a milky glass fragment, a "Hemingway" power pole insulator, and an iron railroad spike. These artifacts were determined to lack association and context with other archaeological materials and do not have substantial historic significance. The Project's impacts to these isolated resources would

be less than significant. (L&L Environmental, 2018c, pp. 36-37, 47) Notwithstanding, due to the presence of historic artifacts on the Project site and the high historic resources sensitivity of the Project area, L&L Environmental determined that the Project has the potential to impact subsurface (i.e., buried) historic resources during construction activities. Accordingly, the Project would be required to implement mitigation measures MM CR-8 through MM CR-11, which would ensure the proper identification and subsequent treatment of any archeological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of MM CR-8 through MM CR-11, the Project's potential impacts to historic archaeological resources would be reduced to less-than-significant levels.

The Project site abuts a segment of the Atchison, Topeka, and Santa Fe Railway (BNSF Railway) that is eligible for listing on the NRHP (L&L Environmental, 2018c, p. 27). The Railway is located off-site and the Project would not encroach within the Railway right-of-way or modify or physically impact the Railway. Accordingly, the Project's impacts to the historic BNSF Railway that abuts the Project site would be less than significant.

V-b) **Less-than-Significant Impact with Mitigation Incorporated.** Based on a field survey and archival records search conducted by L&L Environmental, no prehistoric archaeological resources were observed on the surface of the Project site or have been previously recorded within the Project's disturbance area (L&L Environmental, 2018b, p. 23). However, due to the low surface visibility on portions of the Project site and the lack of previous, deep ground disturbance within the southern portion of the Project site, and the Project site's relative proximity to two known Serrano villages, L&L Environmental concluded that there is a moderate potential for subsurface (i.e., buried) prehistoric resources to be present on the Project site (L&L Environmental, 2018b, pp. 30-31). Accordingly, the Project would be required to implement mitigation measures MM CR-8 through MM CR-11, which would ensure the proper identification and subsequent treatment of any archeological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of MM CR-8 through MM CR-11, the Project's potential impacts to prehistoric archaeological resources would be reduced to less-than-significant levels

V-c) **Less-than-Significant Impact with Mitigation Incorporated.** No known paleontological resources or unique geologic features are present on the Project site. Notwithstanding, the San Bernardino County General Plan EIR states that unknown paleontological resources have the potential to exist on properties that have not been disturbed by prior development activities (such as the majority of the Project site) (SB County, 2007b, p. IV-63). Accordingly, the Project has the potential to result in significant adverse impacts to paleontological resources that may exist beneath the ground surface on the Project site and mitigation would be required. The Project's adherence to MM CR-12 and MM CR-13 would ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of MM CR-12 and MM CR-13, the Project's potential impacts to paleontological resources would be reduced to less-than-significant levels.

V-d) **Less-than-Significant Impact.** The Project site does not contain a cemetery, and no known formal cemeteries are located within the immediate site vicinity. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation

activities associated with Project construction. If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, Section 7050.5 "Disturbance of Human Remains." According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to human remains, including human remains of Native American ancestry, would be less than significant.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of Project approval to reduce these impacts to a level considered less than significant:

MM CR-1: The Project Applicant/Developer shall coordinate with the County of San Bernardino to prepare signage that will educate visitors to the Project site about the importance of Historic Route 66. The sign shall be installed within the front yard landscape setback, fronting Cajon Boulevard, accessible for public viewing. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for the sign installation prior to the Certificate of Occupancy issuance.

MM CR-2: The Project Applicant/Developer shall install Historic Route 66 pavers on the sidewalk on Cajon Boulevard along the Project site frontage. The paver intervals shall not exceed 100 feet in length to commemorate the roadway. The location of the pavers shall be shown on the Project's roadway improvement plans for Cajon Boulevard that are submitted to the County of San Bernardino for approval. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for paver installation prior to the Certificate of Occupancy issuance.

MM CR-3: The Project shall include landscaping along the Project site's frontage with Cajon Boulevard that complies with the applicable design standards/guidelines from the Glen Helen Specific Plan. The landscaping shall beautify the segment of Cajon Boulevard that abuts the

Project site and create an enjoyable viewing experience for motorists. The County of San Bernardino shall verify the landscaping has been installed prior to the issuance of a Certificate of Occupancy.

MM CR-4: For the duration of construction activities, protective fencing and/or appropriate cautionary markers shall be placed around the base of the transmission line towers to protect the towers from inadvertent impacts. During construction, cranes or other construction equipment with the potential to reach the height of the transmission lines shall maintain the minimum separation from the transmission line towers required by Southern California Edison.

MM CR-5: The Project Applicant/Developer shall coordinate with the County of San Bernardino to prepare signage that will educate visitors to the Project site about the importance of the historic transmission line that traverses the Project site. The sign shall be installed within the front yard landscape setback, fronting Cajon Boulevard, accessible for public viewing. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for the sign installation prior to the Certificate of Occupancy issuance.

MM CR-6: Vehicle parking shall be prohibited within the transmission line easement that traverses the Project site until and unless the Project has completed Southern California Edison's consent review process and written approval is provided by Southern California Edison. If Southern California permits within the on-site transmission line easement, such parking shall be restricted to passenger vehicles. No truck or trailer parking, long-term parking of any vehicle, or vehicle storage shall be permitted within the easement and signage the describes the parking restrictions within the easement shall be placed in a conspicuous location.

MM CR-7: No trees shall be installed along Cajon Boulevard where the transmission line easement intersects with Cajon Boulevard to maintain visibility of the transmission line towers. Additionally, no aboveground improvements with the potential to detract from the visual character of the overhead transmission lines, including but not limited to light poles and trees, shall be placed in the easement without written approval from Southern California Edison.

MM CR-8: Prior to the issuance of a grading permit, the Project Applicant/Developer shall provide evidence to the County of San Bernardino that a qualified archaeologist (herein, "Project Archaeologist") with at least 3 years of regional experience in archaeology has been retained to conduct prehistoric and historic archaeological monitoring during earthmoving activities on-site and excavation activities within Cajon Boulevard. The Project Archaeologist shall be present on-site to monitor all ground-disturbing activities until the Project Archaeologist determines that the archaeological sensitivity of the Project's disturbance area has been reduced to low (i.e. older soil deposition, high alluvial activity and therefore highly disturbed deposit). Should the Project Archaeologist determine that there are no archaeological resources within the Project's disturbance area or should the archaeological sensitivity be reduced to low during construction activities, archaeological monitoring activities shall cease.

MM CR-9: Prior to the issuance of a grading permit, the Project Applicant/Developer or Project Archaeologist shall provide evidence to the County of San Bernardino that a Cultural

Resources Monitoring Plan (CRMP) has been developed to guide the procedures and protocols of an archaeological monitoring program to be implemented during Project construction.

MM CR-10: Prior to the issuance of a Certificate of Occupancy, the Project Archaeologist shall submit a report to the County of San Bernardino and the South Central Coast Information Center that summarizes the results of the prehistoric and historic archaeological monitoring conducted during Project construction. The final report shall itemize any archaeological resources recovered, with maps to accurately record the original location of recovered resources, and provide evidence that the resources were donated to and accepted for curation by the San Bernardino County Museum or other accredited repository.

MM CR-11: If a significant archaeological resource is discovered on the Project site as defined by CEQA §21083.2, the Project Archaeologist shall temporarily halt all grading within a 100-foot radius of the discovered resource and make recommendations to the County of San Bernardino on the measures from the CRMP and measures the Monitoring, Discovery, Treatment, and Disposition Plan (MDTDP) that shall be implemented to protect/recover the discovered resource(s). No further grading shall occur within a 100-foot radius of the discovery until the County of San Bernardino approves the protection/recovery measures and the measures have been implemented by the Project Archaeologist. Any archaeological artifacts recovered as a result of mitigation, excluding items covered by the provisions of applicable CRMP and MDTDP, shall be donated to the San Bernardino County Museum as directed by the County's General Plan policies.

MM CR-12: Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to the County of San Bernardino that the construction site supervisors and crew members involved with grading and trenching operations are trained to recognize paleontological resources (fossils) should such resources be unearthed during ground-disturbing construction activities. If a suspected paleontological resource is identified, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations in a 100-foot radius around the find and seek identification and evaluation of the suspected resource by a qualified paleontologist meeting the definition of a qualified vertebrate paleontologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The significance of the discovered resources shall be determined by the qualified paleontologist. If the resource is determined to be significant, Mitigation Measure CR-4 shall apply.

MM CR-13: If a significant paleontological resource is discovered on the property, discovered fossils or samples of such fossils shall be collected and identified by a qualified vertebrate paleontologist. Significant specimens recovered shall be properly recorded, treated, and donated to the San Bernardino County Museum, Division of Geological Sciences, or other repository with permanent retrievable paleontologic storage. A final report shall be prepared and submitted to the County of San Bernardino that itemizes any fossils recovered, with maps to accurately record the original location of recovered resources, and contains evidence that the resources were donated to and accepted for curation by the San Bernardino County Museum or other repository.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS				
Would the project:				
a) Expose people or structures to 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?	☐	☐	☐	☒
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 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?	☐	☐	☐	☒
SUBSTANTIATION: Check ☐ if project is located in the Geologic Hazards Overlay District.				

A *Geotechnical Investigation* was prepared for the Project by NorCal Engineering to evaluate the geotechnical conditions of subject property, identify any geologic hazards, and provide recommendations for the future development of the Project. This report is included as *Technical Appendix* F to this Initial Study and its findings are incorporated into the analysis presented herein.

VI-a) **I. No Impact.** There are no known active or potentially active earthquake faults on the Project site or in the immediate area, and the Project site is not located within an "Alquist-Priolo" Special Studies Zone (Norcal Engineering, 2017, p. 2). Because there are no known faults located on the Project site, there is no potential for the Project to expose people or structures to substantial adverse effects related to ground rupture. Thus, no impact would occur.

ii. Less-than-Significant Impact. The Project site is located in a seismically active area of Southern California and is expected to experience moderate-to-severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the proposed warehouse building is required to be constructed in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 (Part 2), and the County of San Bernardino Building Code, which is based on the CBSC with local amendments. The CBSC and County of San Bernardino Building Code have been specifically tailored for California earthquake conditions and provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures. In addition, the CBSC (Chapter 18) and the County of San Bernardino require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and implement the site-specific recommendations contained therein to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems. Such a report has been prepared for the Project site and is included as *Technical Appendix F* to this Initial Study. The County would condition the Project to comply with the site-specific ground preparation and construction recommendations contained in this report (SB County, 2018, § 83.04.020). With mandatory compliance with these standards and site-specific design and construction measures, potential impacts related to seismic ground shaking would be less than significant. As such, the Project would not expose people or structures to substantial adverse effects, including loss, injury, or death, involving seismic ground shaking. Impacts would be less-than-significant.

iii. Less-than-Significant Impact. According to the County's Geologic Hazards Overlay exhibit, the Project site is located in an area with medium susceptibility for liquefaction (SB County, 2010b). However, the geotechnical investigation prepared for the Project site concludes that based on observed subsurface conditions, the potential for liquefaction at the site is low due to dense to very dense sandy soils and lack of groundwater in the upper 50 feet of soils (Norcal Engineering, 2017, p. 7). Thus, the Project would expose people and structures to less-than-significant effects involving seismic-related ground failure.

Iv. Less-than-Significant Impact. The Project site is virtually flat and contains no substantial natural or man-made slopes under existing conditions. There are no substantial natural or man-made slopes in the immediate Project site vicinity, either. Accordingly, the Project site is located in an area with a low potential for landslides. Proposed grading would create manufactured slopes; however, proposed manufactured slopes on-site would be constructed to be stable in accordance with the design safety standards and recommendations included within the Project's geotechnical study. Accordingly, development on the subject property would not be exposed to landslide risks, and the Project would not pose a landslide risk to surrounding properties and a less-than-significant impact would occur.

VI-b) Less-than-Significant Impact. The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and/or long-term operation.

Impact Analysis for Temporary Construction-Related Activities

Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation, which has the potential to temporarily expose on-site soils that would be subject to erosion during rainfall events or high winds. Pursuant to State Water Resources Control Board requirements, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. The County's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP) (SB County, 2018, § 85.11.030). The SWPPP would identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges during construction. In addition, the Project would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion (SCAQMD, 2005). With mandatory compliance to the requirements noted in the Project's SWPPP, as well as applicable regulatory requirements, the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

Long-Term Operational Activities

Following construction, wind and water erosion on the Project site would be less than existing conditions because the Project site would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Implementation of the Project would result in less long-term erosion and loss of topsoil than occurs under the site's existing conditions.

The County's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the County for approval a Water Quality Management Plan (WQMP) (SB County, 2018, § 35.0118). The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The Preliminary WQMP for the Project prepared by Thienes Engineering (Thienes) (attached hereto as *Technical Appendix J*) incorporates catch basin/inlet filters and one (1) underground infiltration basin (Thienes, 2017b). The catch basin/inlet filters would remove waterborne pollutants from storm water flows, including silt and sediment. The underground infiltration basin would facilitate percolation to maximize on-site infiltration and minimize off-site storm water discharge. These design features would be effective at removing silt and sediment from storm water runoff, and the Preliminary WQMP requires post-construction maintenance and operational measures to ensure on-going erosion protection. Compliance with the Preliminary WQMP would be required as a condition of Project approval and long-term maintenance of

on-site water quality features is required. (SB County, 2018, § 35.0118) Therefore, the proposed Project would not result in substantial erosion or loss of top soil during long-term operation. The Project's impact would be less than significant.

VI-c) **Less-than-Significant Impact.** The Project site's geotechnical report (*Technical Appendix F*) indicates that the site's settlement potential would be attenuated through the proposed removal of near surface soils down to competent materials and replacement with properly compacted fill, which is included as a recommendation in the Project site's geotechnical report. Additionally, only minor ground subsidence (±0.1 feet) is expected to occur in the soils below the zone of removal, due to settlement and machinery working. (Norcal Engineering, 2017, pp. 9-10). Through standard conditions of approval, the proposed Project would be required by the County to incorporate the recommendations contained within the Project site's geotechnical report into the grading plan for the Project (SB County, 2018, § 83.04.020). As such, implementation of the Project would result in less-than-significant impacts associated with soil shrinkage/subsidence and collapse.

As discussed in Thresholds VI-a(iii) and VI-a(v), development of the property as proposed by the Project would result in a less-than-significant impact involving ground failure, including liquefaction and landslide, and a less-than-significant impact would occur.

VI-d) **Less-than-Significant Impact.** As determined by Norcal Engineering, the near surface on-site soils possess a very low expansion potential (Expansion Index ranging from 0-20) (Norcal Engineering, 2017, p. 15). The minimal expansive characteristics of on-site soils would be attenuated by implementation of the foundation and floor slab design recommendations included in the Project's geotechnical report (Norcal Engineering, 2017, pp. 7-17). Pursuant to Section 83.04.020 of the County's Development Code, the Project would be required to incorporate the recommendations contained within the Project geotechnical report into the grading plan for the Project. As such, implementation of the Project would result in less-than-significant impacts associated with expansive soils and would not create substantial risks to life or property.

VI-e) **No Impact.** The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. 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?	☐	☐	☒	☐
SUBSTANTIATION:				

A *Greenhouse Gas Analysis* was prepared for the Project by Urban Crossroads to quantify the greenhouse gas (GHG) emissions that would result from Project-related construction and operation. This report is included as *Technical Appendix H* to this Initial Study and its findings are incorporated into the analysis presented herein.

VII-a) **Less-than-Significant Impact.** While estimated Project-related GHG emissions can be calculated, the direct impacts of such emissions on Global Climate Change (GCC) and global warming cannot be determined on the basis of available science because global climate change is a global phenomenon and not limited to a specific locale such as the Project site and its immediate vicinity. Furthermore, there is no evidence that would indicate that the emissions from a project the size of the proposed Project could directly or indirectly affect the global climate. Because global climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global climate change; rather, Project-related impacts to global climate change only could be significant on a cumulative basis. Therefore, the analysis below focuses on the Project's potential to contribute to global climate change in a cumulatively considerable way.

The County of San Bernardino adopted a Greenhouse Gas Reduction 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 Greenhouse Gas Reduction Plan includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year is used to determine if additional analysis is required. If a proposed project were to produce GHG emissions in exceedance of 3,000 MTCO2e per year, then the project is required to either achieve a minimum of 100 points per the Screening Tables provided within the Greenhouse Gas Reduction Plan or achieve a 31% reduction in $MTCO_2e$ emissions over 2007 emissions levels. (Urban Crossroads, 2018d, p. 51) In accordance with the Greenhouse Gas Reduction Plan, if the Project were to emit less than 3,000 $MTCO_2e$ per year, or reach the 100-point minimum score on the screening table, or reduce emissions by 31% from 2007 emissions, the Project would be determined to have a less than significant impact for GHG emissions.

The Project's annual GHG emissions are summarized in Table 5, *Total Annual Project Greenhouse Gas Emissions*. The methodology used to calculate the Project's GHG emissions is described in detail in *Technical Appendix H*.

Table 5 Total Annual Project Greenhouse Gas Emissions

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	27.21	0.00	0.00	27.33
Area	0.02	6.00E-05	0.00	0.03
Energy	304.37	0.01	0.00	305.54
Mobile Sources (Passenger Cars)	568.44	0.01	0.00	568.76
Mobile Sources (Trucks)	2,279.40	0.08	0.00	2,281.45
Waste	61.35	3.63	0.00	151.98
Water Usage	332.03	2.44	0.06	410.75
Total CO_2E (All Sources)	**3,745.83**			

Source: (Urban Crossroads, 2018d, Table 3-1)

As shown in Table 5, the Project would emit approximately 3,745.83 $MTCO_2e$ per year which would exceed the County's screening threshold of 3,000 $MTCO_2e$ emissions per year. Notwithstanding, the Project would include design features that would directly and indirectly reduce GHG emissions and achieve at least 100 points from the County of San Bernardino Greenhouse Gas Reduction Plan DRP Screening Tables (refer to Appendix 3.2 of *Technical Appendix H*). In summary, these design features include, but are not limited to, building insulation, roofing materials, window enhancements, lighting design, landscape irrigation, potable water systems, and electric vehicle charging stations. Accordingly, because 100 points would be achieved, the Project would not generate substantial GHG emissions – either directly or indirectly – that would have a significant impact on the environment. Impacts would be less than significant.

Although the Project's impact would be less than significant, MM GHG-1 is required to ensure the Project would comply with the County's Greenhouse Gas Reduction Plan DRP screening tables.

VII-b) **Less-than-Significant Impact.** The Project would comply with a number of regulations, policies, plans, and policy goals that would reduce GHG emissions, including the County of San Bernardino Greenhouse Gas Reduction Plan (as shown above under Threshold VII-a) Title 24 of the California Building Standards Code (CBSC), Assembly Bill 32 (AB 32), and Senate Bill 32 (SB 32), which are regulations particularly applicable to the Project. For more information on these regulations as well as other state-wide plans, policies, and regulations associated with GHG emissions that are not directly applicable to the Project, refer to *Technical Appendix H*.

The Project would include the construction and operation of a warehouse building, which would include contemporary, energy-efficient/energy-conserving design features and operational procedures. Warehouse land uses are not inherently energy-intensive and the

total Project energy demands would be comparable to, or less than, other warehouse projects of similar scale and configuration due to the Project's modern construction and requirement to be constructed in accordance with the most recent CBSC. The CBSC includes the California Energy Code, or Title 24, Part 6 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings. The California Energy Code was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated approximately every three years to improve energy efficiency by incorporating new energy efficiency technologies and methods. The Project would be required to comply with all applicable provisions of the CBSC. As such, the Project's energy demands would be minimized through design features and operational programs that, in aggregate, would ensure that Project energy efficiencies would comply with – or exceed – incumbent CBSC energy efficiency requirements, thereby minimizing GHG emissions produced from energy consumption. An *Energy Analysis* report prepared for the Project determined that the Project would not result in the inefficient, wasteful, and unnecessary consumption of energy (Urban Crossroads, 2018c, pp. 26-28). The Project has no potential to be inconsistent with the mandatory regulations of the CBSC because compliance is required by state law.

The Global Warming Solutions Act of 2006 (AB 32) is the State of California's primary GHG emissions reduction regulation. AB 32 requires that by year 2020 the State's GHG emissions must be reduced to year 1990 levels. The California Air Resources Board (CARB) identified measures in its Scoping Plan that would reduce statewide GHG emissions and achieve the emissions reductions goals of AB 32. Thus, projects that are consistent with the CARB Scoping Plan would not conflict with AB 32's mandate to reduce state GHG emissions. A detailed description of the Project's consistency with the CARB Scoping Plan is presented in Section 3.7 of *Technical Appendix H*. As presented in *Technical Appendix H*, the Project would not conflict with any applicable measures of the CARB Scoping Plan. (Urban Crossroads, 2018d, p. 48)

In April 2015, Governor Edmund Brown Jr. signed Executive Order (EO) B-30-15, which advocated for a statewide GHG-reduction target of 40 percent below year 1990 levels by 2030 and 80 percent below 1990 levels by 2050. In September 2016, Governor Brown signed the Senate Bill (SB) 32. SB 32 formally established a statewide goal to reduce GHG emissions to 40 percent below year 1990 levels by 2030. To date, no statutes or regulations have been adopted to translate the year 2050 GHG reduction goal into comparable, scientifically-based statewide emission reduction targets.

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the years 2020 and 2030 reduction targets established by AB 32 and SB 32, respectively (Urban Crossroads, 2018d, p. 32). As described above, the Project would not conflict with or obstruct implementation of the CARB Scoping Plan; therefore, the Project would not interfere with the State's ability to achieve the year 2030 GHG-reduction target established by SB 32.

Rendering a significance determination for year 2050 GHG emissions relative to EO B-30-15 would be speculative because EO B-30-15 establishes a goal 32 years into the future; no

agency with GHG subject matter expertise has adopted regulations to achieve the statewide goal at the project-level; and, available analytical models cannot presently quantify all project-related emissions in those future years. Further, due to the technological shifts anticipated and the unknown parameters of the regulatory framework in 2050, available GHG models and the corresponding technical analyses are subject to limitations for purposes of quantitatively estimating the Project's emissions in 2050. (Urban Crossroads, 2018d, p. 33)

As described on the preceding pages, the Project would not conflict with the State's ability to achieve the State-wide GHG reduction targets defined in AB 32 and would be consistent with applicable policies and plans related to GHG emissions reductions. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and would result in a less-than-significant impact.

SIGNIFICANCE: Although no significant adverse impacts related to greenhouse gases have been identified, the following mitigation measure is required as a condition of Project approval to ensure the Project's compliance the County of San Bernardino Greenhouse Gas Reduction Plan:

MM GHG-1: Prior to issuance of building permits, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include features identified in the County of San Bernardino Development Review Processes (March 2015) Greenhouse Gas Emissions Screening Tables, as needed to achieve the required 100 points.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. 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 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 for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐
SUBSTANTIATION:				

A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by SCS Engineers (herein, "SCS"), in October 2017 (included as *Technical Appendix I* to this Initial Study). As part of the Phase I ESA efforts, SCS conducted a site reconnaissance; interviews with persons with a historical link to the property; a review of historical sources; a review of regulatory agency records; and a review of a regulatory database report provided by a third-party vendor (SCS Engineers, 2017, pp. 1-2).

VIII-a) Less-than-Significant Impact.

Impact Analysis for Existing Site Conditions

A Recognized Environmental Condition (REC) is defined as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property." Based on a review of historic regulatory agency hazardous materials databases, historic site aerial photographs, interviews with current property owners, and a reconnaissance of the Project site SCS determined that the Project site does not contain any RECs (SCS Engineers, 2017, p. 7).

The Project site was undeveloped prior to 1954, although high tension electrical transmission lines have traversed the site since approximately the mid-1930s. In 1954, the northern/western portion of site was operated as a lumber mill. The eastern/southern portion of the Project site was never developed. The lumber mill was damaged and/or destroyed by three different wildfires: one in the 1970s, one in the 1980s, and one around 2005. The lumber mill was not re-built after the 2005 wildfire. Since 2005, the northern/western portion of the Project site has been used as a storage and equipment staging area for a sprayed concrete business and as a truck and truck trailer parking area. (SCS Engineers, 2017, pp. 10-11) There were no USTs, ASTs, drain lines, sumps, ponds, pits, lagoons, stressed vegetation, hydraulic equipment, or wells found on the Project site. One pole-mounted Southern California Edison (SCE) electrical transformer was found servicing the sprayed concrete operation in the northwestern portion of the Property. Some electric transformers have been known to utilize polychlorinated biphenyls (PCBs), an organic pollutant, as an insulating cooling fluid. However, based on a statement from SCE and a study conducted on SCE electric transformers, SCS concluded that there is no significant environmental impact anticipated from the electric transformer currently used on the Project site. Five-gallon containers of new motor oil are stored at a shipping container on the central-western side of the property. Empty motor oil containers were observed inside a small shed next to a work area where oil and tire changes are conducted. With the exception of some small, superficial oil stains from leaking vehicles, SCS did not observe any evidence of past chemical releases. The small oil stains are not considered to be a hazardous condition. (SCS Engineers, 2017, pp. 5-6)

The Project site is located approximately eight miles upgradient of two plumes of groundwater (the Newmark Plume area and the Muscoy Plume) which contain volatile organic compounds(VOCs). Based on a review of historical vapor migration data, it is unlikely that there is a current risk of vapor migration to the subject site from these groundwater plumes due to the depth to groundwater below the Project site (more than 50 feet) and the fact that there has been no indication of the past use of chlorinated solvents on the Project site. (SCS Engineers, 2017, p. 14)

Based on the foregoing analysis, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials associated with the site's existing condition. A less-than-significant impact would occur.

Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SCAQMD, and Santa Ana Regional Water Quality Control Board (RWQCB). With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Impact Analysis for Long-Term Operational Activities

The future building occupant(s) for the Project site are not yet identified. However, the Project is designed to house warehouse distribution occupants and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that requires businesses to plan and prepare for possible chemical emergencies. Any business that occupies the warehouse building on the Project site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the San Bernardino County Fire Department Hazardous Materials Division in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County of San Bernardino Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the Project, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous

substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. In addition, the Project would be required to comply with County of San Bernardino Development Code § 23.0107, which establishes specific requirements for the storage of hazardous materials and Development Code § 23.0602, which establishes requirements for reporting and permitting the use, handling, storage, and transportation of hazardous materials.

With mandatory regulatory compliance, along with mandatory compliance with the County of San Bernardino Development Code, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

VIII-b) **Less-than-Significant Impact.** Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold VIII-a, the transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project site would operate as a warehouse distribution center. Based on the operational characteristics of warehouse distribution centers, it is possible that hazardous materials could be used during the course of a future occupant's daily operations; however, as discussed above under Threshold VIII-a, the Project would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project and mitigation would not be required.

VIII-c) **No Impact.** There are no schools located within 0.25-mile of the Project site. The nearest school to the Project site is Cesar Chavez Middle School, located approximately 0.55-mile northeast of the Project site. (Google Earth, 2018) Thus, the Project would not have a significant effect in emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

VIII-d) **No Impact.** The Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (SCS Engineers, 2017, pp. 11-13; CDTSC, n.d.). Accordingly, no impact would occur.

VIII-e) **No Impact.** The Project site is not located within an airport land use plan or within two miles of a public airport (Google Earth, 2018). The warehouse building proposed by the Project would be approximately 46 feet tall and does not include an air travel component (e.g., runway, helipad). Based on the foregoing, the Project would not result in safety hazards for people residing or working in the Project area and no impacts would occur.

VIII-f) **No Impact.** There are no private airfields or airstrips in the vicinity of the Project site. Because no private airports are located nearby, there is no potential for the Project to result in a safety hazard for people residing or working the Project area. No impact would occur.

VIII-g) **No Impact.** The Project site does not contain any emergency facilities under existing conditions nor does it serve as an emergency evacuation route, so there is no potential for the Project to adversely affect an existing emergency response or evacuation plan. During construction and at Project buildout, the proposed Project would be required to maintain adequate emergency access for emergency vehicles as required by the County. As part of the County's discretionary review process, the County of San Bernardino reviewed the Project to ensure that appropriate emergency ingress and egress would be available to-and-from the proposed warehouse building for public safety, and determined that the Project would not substantially impede emergency response times in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

VIII-h) **Less-than-Significant Impact.** According to the County of San Bernardino Hazard Overlay Maps, the Project site is not located in an area of substantial or high fire risk (SB County, 2010c). Notwithstanding, structures formerly on the Project site were damaged or destroyed in three different wildfires that occurred in the 1970s, 1980s, and in 2005). The proposed Project would construct a modern warehouse facility on-site that complies with California Building Code minimum requirements for fire resistive building materials and building features, including an internal sprinkler system, to minimize potential fire hazards. The Project's landscaping would be properly maintained and irrigated and would thereby decrease the potential fire fuel load on the Project site. Thus, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Impacts would be less than significant.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY				
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e) Create or contribute runoff which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
SUBSTANTIATION:				

A *Preliminary Water Quality Management Plan (WQMP)* and *Preliminary Hydrology Calculations* report were prepared for the Project by Thienes Engineering, Inc. The purpose of the *Preliminary WQMP* is to

help identify pollutants of concern, establish the Best Management Practices for the Project, and establish long term maintenance responsibilities for the Project. The *Preliminary Hydrology Calculations* report identifies drainage patterns and off-site flow tributary to the Project site and evaluates post-development runoff conditions. The hydraulic calculations are intended to be used to design the Project's storm drain system. These reports are included as *Technical Appendices J* and *K*, respectively, to this Initial Study and their findings are incorporated into the analysis presented herein.

IX-a) **Less-than-Significant Impact.** The California Porter-Cologne Water Quality Control Act (Section 13000 *et seq.*, of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act (CWA)) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River is contained in the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* (updated June 2011) and the *One Water, One Watershed Plan 2.0 (OWOW) for the Santa Ana River Watershed* (also referred to as "Integrated Regional Water Management Plan," dated February 4, 2014), prepared by the Santa Ana Watershed Project Authority. These documents are herein incorporated by reference and are available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501. (SARWQCB, 2011; SAWPA, 2014)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site is located within the Santa Ana River Watershed. Receiving waters for the property's drainage include: Lytle Creek Channel Santa Ana River Reaches 1 through 5, and the Prado Dam, which discharge into the Pacific Ocean. Lytle Creek Channel is impaired by pathogens; Santa Ana River Reach 2 is impaired by indicator bacteria; Santa Ana River Reach 3 is impaired by pathogens, copper, and lead; and Santa Ana River Reach 4 is impaired by pathogens. (Thienes, 2017b, p. 3-3)

A specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a SWPPP and obtain authorization to discharge storm water under an NPDES construction storm water permit.

Temporary Construction-Related Activities

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

Pursuant to the requirements of the Santa Ana RWQCB and the County of San Bernardino (Development Code Chapter 85.11 and § 35.0121), the Project would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is

required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The SWPPP will specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does violate any water quality standards or waste discharge requirements during construction activities. Therefore, water quality impacts associated with construction activities would be less than significant and no mitigation measures would be required.

Post-Development Water Quality Impacts

Stormwater pollutants commonly associated with the warehouse land use proposed by the Project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. Based on current receiving water impairments (pursuant to the CWA's Section 303(d) list), the Project's pollutants of concern are nutrients, metals, and pathogens. (Thienes, 2017b, p. 2-2)

Pursuant to the County of San Bernardino (Development Code § 35.0118), the Project would be required to implement a WQMP to demonstrate compliance with the County's NPDES permit, and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a site-specific post-construction water quality management program designed to address the pollutants of concern of a development project via BMPs, implementation of which ensures the on-going protection of the watershed basin. The Project's Preliminary WQMP, prepared by Thienes, is included as *Technical Appendix J* appended to this Initial Study. As identified in *Technical Appendix J*, the proposed Project is designed to include on-site, structural source control BMPs (including an infiltration basin and on-site storm drain catch basins/inlets with filters) as well as operational source controls (including but not limited to: drainage system maintenance, storm drain system stenciling and signage, and implementation of minimal pesticide use) to minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Compliance with the Preliminary WQMP would be required as a condition of Project approval pursuant to Municipal Code § 35.0118, and long-term maintenance of on-site BMPs would be required to ensure their long-term effectiveness. Therefore, water quality impacts associated with long-term operational activities would be less than significant.

In addition to the WQMP, the NDPES program also requires certain land uses, including industrial land uses as proposed by the Project, to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted an updated new NPDES permit for storm water discharge associated with industrial activities (referred to as the "Industrial General Permit"). Under the newly effective NPDES Industrial General Permit, the Project is be required to prepare a SWPPP for

operational activities and implement a long-term water quality sampling and monitoring program or receive an exemption. Because the permit is dependent upon the operational activities of the buildings, and the Project's future building occupants and their operations are not known at this time, details of the SWPPP (including BMPs) or potential exemption to the SWPPP operational activities requirement cannot be determined at this time. However, based on the requirements of the NPDES Industrial General Permit, it is assured that the Project's mandatory compliance with all applicable regulations would further reduce potential water quality impacts during long-term operation.

Based on the foregoing analysis, the Project would not violate any water quality standards or waste discharge requirements during long-term operation. Impacts would be less than significant.

IX-b) **Less-than-Significant Impact.** No potable groundwater wells are proposed by the Project. The proposed Project would be served with potable water by the City of San Bernardino Municipal Water Department (SBMWD). The SBMWD relies on the Bunker Hill Groundwater Basin as a source of its water supply. The SBMWD has indicated it has sufficient available water resources to adequately serve the Project in addition to past, present, and future commitments to supply water. (WSC, 2016, pp. 10-12 - 10-19) Therefore, the proposed Project would not substantially deplete groundwater supplies and the Project's impact to groundwater supplies would be less than significant.

Development of the Project would increase impervious surface coverage on the property, which would reduce the amount of water percolating down into the underground aquifer that underlies the Project site and a large area of the County. However, the impact of an incremental reduction in groundwater recharge area would not be significant because the SBMWD purchases water from the Municipal Water District of Southern California in order recharge the groundwater basin in times of need and does not solely rely on surface water percolation to replenish the groundwater basin. Additionally, water captured by the proposed Project's infiltration basin and landscaped areas would have the opportunity to percolate into the ground. With buildout of the Project, the local groundwater levels would not be substantially adversely affected. Accordingly, buildout of the Project would not interfere substantially with groundwater recharge.

For the reasons stated above, the Project would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant.

IX-c) **Less-than-Significant Impact.** Under existing conditions, storm water sheet flows across the Project site in a southeasterly direction toward Cajon Boulevard. An existing 60-inch-diameter storm drain pipe is located beneath Cajon Boulevard and is designed to convey peak runoff within the Project area during 100-year storm events. Storm water runoff originating off-site, from properties to the north and northeast of the Project site, generally sheet flow in a southeasterly direction onto the Project site.

The Project would grade the entire property and construct one warehouse building and associated improvements, which would change the site's existing ground contours and alter the site's existing, internal drainage patterns. Upon buildout of the Project, storm water originating in the northwestern, northern, and northeastern portions of the Project would flow into catchment basins and travel southeasterly toward a drainage inlet located near the southeastern corner of the Project site where "first flush" flows (i.e., initial runoff) would be diverted into an underground infiltration basin. The infiltration basin would contain a portion of on-site storm water flows and facilitate percolation into the ground. When the underground infiltration basin reaches capacity, storm water would bypass the basin, convey southwesterly, and discharge into an above-ground water quality management basin located at the southern corner of the Project site. When the above-ground water quality management basin reaches capacity, storm water would be discharged into the existing storm drain line within Cajon Boulevard.

Stormwater originating in the southeastern portions of the Project site would flow into catchment basins, travel southeasterly, and discharge at the above-ground water quality management basin in the southern corner of the Project site. When the above-ground water quality management basin reaches capacity, storm water would be discharged into the existing storm drain line within Cajon Boulevard.

Off-site runoff, which sheet flows southerly and southeasterly onto the Project site, would be captured by above-ground u-channels installed along the northwestern and northeastern boundaries of the Project site. Off-site storm water would be conveyed across the site and would discharge into the existing storm drain line within Cajon Boulevard.

Although the Project would alter the subject property's internal drainage patterns, such changes would not result in substantial erosion or siltation on- or off-site. Under post-development conditions, a majority of the site would be covered with impervious surfaces and, therefore, the amount of exposed soils on the Project site would be minimal. Also, as discussed under Threshold IX-a, the Project would construct an integrated storm drain system on-site with BMPs to minimize the amount of water-borne pollutants carried from the Project site. The BMPs proposed by the Project and enforced by the Project's Preliminary WQMP, including catch basins/inlets with filters and an underground infiltration basin are highly effective at removing sediment from storm water runoff flows. Therefore, storm water runoff flows leaving the Project site would not carry substantial amounts of sediment. Once storm water runoff leaves the Project site, it would be discharged into a storm drain pipe beneath Cajon Boulevard. Because there are no exposed soils at the Project's discharge points, there is no potential for the Project's storm water runoff to result in erosion as it leaves the Project site. Accordingly, the Project would not result in substantial erosion or siltation on- site or off-site, and a less-than-significant impact would occur.

IX-d) **Less-than-Significant Impact.** As described above under Threshold IX-c, proposed grading and earthwork activities on the Project site would alter the site's existing drainage patterns but would not substantially alter the drainage pattern of the local area. Under long-term development conditions, the peak storm water runoff flows discharged from the Project site would be reduced relative to existing conditions, from 67.6 cubic feet per second (cfs) under existing conditions to 58.3 cfs under Project buildout. Stormwater flows leaving the Project

site would be conveyed to an existing storm drain line beneath Cajon Boulevard. The storm drain line beneath Cajon Boulevard is designed pursuant to the City of San Bernardino Vulcan Materials Master Plan (SBVMMP). The SBVMMP identifies master-planned drainage and flood control facilities that are needed to safely convey storm water runoff generated within the SBVMMP area during a 100-year storm event and preclude flooding. The storm drain line beneath Cajon Boulevard that would accept peak storm water runoff flows from the Project is designed pursuant to the SBVMMP and has adequate capacity to accept and convey Project storm water flows downstream and the peak, post-development flows from the Project site are consistent with the projections of the SBVMMP. (Thienes, 2017a, n.p.) Because the proposed Project is consistent with the applicable master drainage plan, Project implementation would not result in flooding on- or off-site due to the introduction of substantial, unanticipated storm water flows. Impacts associated with flooding would be less than significant.

IX-e) **Less-than-Significant Impact.** As discussed above under the analysis for Threshold IX-d, the proposed Project would be consistent with the SBVMMP and existing storm drain improvements have sufficient capacity to convey storm water runoff generated by the Project. Accordingly, the Project would not create or contribute runoff which would exceed the capacity of any planned storm water drainage system, and impacts would be less than significant.

As discussed under the analysis of Threshold IX-a, the proposed Project would be required to comply with a future SWPPP and the Project's Preliminary WQMP (*Technical Appendix J*), which identify required BMPs to be incorporated into the Project to ensure that near-term construction activities and long-term post-development activities of the proposed Project would not result in substantial amounts of polluted runoff. Therefore, with mandatory compliance with the Project's SWPPP and Preliminary WQMP, the proposed Project would not create or contribute substantial additional sources of polluted runoff, and impacts would be less than significant.

IX-f) **No Impact.** Refer to Thresholds IX-a, IX-c, and IX-d above. The Project does not contain any other features that would have the potential to substantially degrade water quality. Thus, no impact would occur.

IX-g) **No Impact.** The proposed Project does not include housing. Therefore, there is no potential for the Project to place housing within a 100-year flood hazard area. No impact would occur.

IX-h) **No Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06071C7910H, the Project site is located within "Flood Zone X (unshaded)" which corresponds with areas of minimal flood hazard (i.e., less than 0.2-percent annual chance of flood, also referred to as a 500-year flood zone). (FEMA, n.d.) Therefore, implementation of the proposed Project would not place structures within a 100-year flood hazard area that would impede or redirect flood flows. No impact would occur.

IX-i) **No Impact.** The nearest dam to the Project site is the Devil's Canyon Percolation Basin, located approximately 1.7 miles northeast of the Project site. According to County of San Bernardino Hazards Maps, the Project site is not located in an identified dam inundation area (SB County, 2010c). There are no levees in the vicinity of the Project site. Accordingly, and

also based on the information provided under Thresholds IX-d, IX-g, and IX-h, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. No impacts would occur.

IX-j) **No Impact.** The Pacific Ocean is located more than 50 miles southwest of the Project site; consequently, there is no potential for tsunamis to impact the Project site. In addition, the Project site and immediate surrounding area do not contain steep hillsides that may be susceptible to mudflow. The nearest large body of surface water to the site is the Devil's Canyon Percolation Basin, located approximately 1.8 miles northeast of the Project site. (Google Earth, 2018) Due to the distance of the Devil's Canyon Percolation Basin from the Project site, a seiche in the Devil's Canyon Percolation Basin would have no impact on the Project site. Therefore, the Project site would not be subject to seiches, mudflows, and/or tsunamis. Thus, no impact would occur and no further analysis of this subject is required.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING				
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐
SUBSTANTIATION:				

X-a) **No Impact.** The Project site is located in a developing area of the County of San Bernardino that is designated for industrial development. Development of the Project site with a warehouse building and associated improvements would not physically disrupt or divide the arrangement of an established community. The properties to the immediate northwest and southeast of the site are undeveloped, and the properties to the northwest and southwest of the site are physically separated by the Project site by railroad tracks/Keller Drive and Cajon Boulevard, respectively. Furthermore, the property is proposed to be developed in accordance with its assigned General Plan land use zoning district (Specific Plan) and GHSP land use zoning designation of "Heavy Industrial (HI)." The Project would serve, effectively, as an extension of existing industrial development patterns to the south and southwest. Thus, no impact would occur.

X-b) **No Impact.** Under existing conditions, the Project site is designated for "Heavy Industrial" land uses by the GHSP. The proposed Project would develop the subject property in accordance with the underlying GHSP land use and development standards and applicable zoning ordinance development standards. Accordingly, the Project would not conflict with the GHSP or Zoning Ordinance. The Project otherwise would not conflict with any applicable goals, objectives, and policies of the SCAQMD AQMP (refer to Threshold III-a) or the SCAG RTP/SCS, and SCAG Regional Comprehensive Plan which rely on General Plan consistency for general compliance with those regional plans. No impact would occur.

X-c) **Less-than-Significant Impact.** Please refer to the analysis provided for Threshold IV-f. The Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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?	☐	☐	☐	☒
SUBSTANTIATION:				

XI-a) **Less-than-Significant Impact.** The California Department of Conservation (DOC) designates the Project site as being located within Mineral Resource Zone (MRZ)-2, which is a zone known to contain significant mineral deposits or have a high likelihood of containing significant deposits (DOC, 2008). However, the mineral resource zone classifications assigned by the DOC focus solely on geologic factors and the potential value and marketability of a mineral resource, without regard to existing land use and ownership or the compatibility of surrounding land uses. The County of San Bernardino General Plan and the County's Glen Helen Specific Plan, which establish the County's plan for the highest and best use of the Project site in consideration of the local land use context, identify the Project site for industrial land uses. This means that the County has determined that industrial land uses on-site are more valuable to the region than potential mineral extraction uses. Additionally, due to constraints on and abutting the Project site (i.e., the powerlines that traverse the Project site, the railroad tracks that abut the site on the north/east, and the proximity to off-site residences) mineral resources extraction would not be feasible on-site. In addition, the County's General Plan and the Glen Helen Specific Plan do not identify any important mineral resource recovery sites on- or in the proximity of the Project site. Accordingly, the Project would result in a less-than-significant impact related to the loss of availability of a known mineral resource.

XI-b) **No Impact.** Please refer to the response to Threshold XI-a, above.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE				
Would the project:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantially temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
SUBSTANTIATION:				

A *Noise Impact Analysis* was prepared for the Project by Urban Crossroads to evaluate Project-related long-term operational and short-term construction noise impacts. This report is included as *Technical Appendix L* to this Initial Study and its findings are incorporated into the analysis presented herein.

XII-a) **Less-than-Significant Impact with Mitigation Incorporated.** Noise generated on or within the vicinity of the Project site under existing conditions is limited to the on-site sprayed concrete operation, vehicles travelling to and from the Project site along Cajon Boulevard, vehicles travelling along Kendall Drive, the railroad lines located west of the Project site, and the railroad lines abutting the northeastern boundary of the Project site, and routine maintenance activities on the Project site (i.e., discing). For more information about the existing noise environment surrounding the Project site, refer to *Technical Appendix L*.

Development of the Project site as a warehouse building has the potential to expose persons to or result in elevated noise levels during both near-term construction activities and under long-term operational conditions. Near-term (i.e., temporary) and long-term (i.e., permanent) noise level increases that would be associated with the Project are described below.

Impact Analysis for Near-Term Construction Noise

The County's Development Code (§ 83.01.080(g)) includes a provision that exempts construction activities that comply with specified performance standards from any maximum noise level limit (SB County, 2018, § 83.01.080). The Project would be conditioned to comply with the County's Development Code; therefore, implementation of the Project would not expose persons to or generate near-term construction noise levels in excess of standards adopted by the County.

Impact Analysis for Long-Term Stationary Operational Noise

According to County Development Code § 83.01.080, the maximum allowable exterior sound levels are as follows: 55 A-weighted decibels (dBA) during the day (7:00am to 10:00pm) and 45 dBA at night (10:00pm to 7:00am) for residential uses; 55 dBA any time of day for professional services; 60 dBA any time of day for commercial uses, and 70 dBA any time of day for industrial uses. These standards are not be exceeded for a cumulative period of 30 minutes (L_{50}), or the standard plus 5 dBA cannot be exceeded for a cumulative period of more than 15 minutes (L_{25}) in any hour; or the standard plus 10 dBA for a cumulative period of more than 5 minutes (L_8) in any hour; or the standard plus 15 dBA for a cumulative period of more than 1 minute (L_2) in any hour: or the standard plus 20 dBA at any time (L_{max}). (SB County, 2018, § 83.01.080) In the City of San Bernardino (which borders the Project site to the southwest, across from Cajon Boulevard), there are no standards restricting exterior noise levels at commercial or industrial uses (City of San Bernardino, 2018, § 19.20.030.15).

Using the reference noise levels collected from other warehouse facilities in the Inland Empire area – which include noise associated with idling trucks, delivery truck activities, parking, backup alarms, and HVAC equipment (to represent the proposed warehouse operations on the Project site) Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site. Refer to *Technical Appendix L* for a detailed description of the methodology used to calculate the Project's operational noise levels. As shown in Table 6, *Project Operational Noise Levels (Without Mitigation)*, the operational noise levels expected to be generated by the Project exceed the County's applicable nighttime exterior noise level threshold at three receiver locations (R2 through R4, which represents residential homes across Kendall Drive). (See Figure 19, *Noise Receiver Locations*, for locations of the modeled receptors and refer to *Technical Appendix L* for a detailed description of the receptors.) The Project's daytime and nighttime noise levels would be acceptable at all other receptor locations. Accordingly, without mitigation the Project would expose receptors in the Project site vicinity to noise levels in excess of standards established in the local noise ordinance and a significant impact would occur.

Figure 19 Noise Receiver Locations

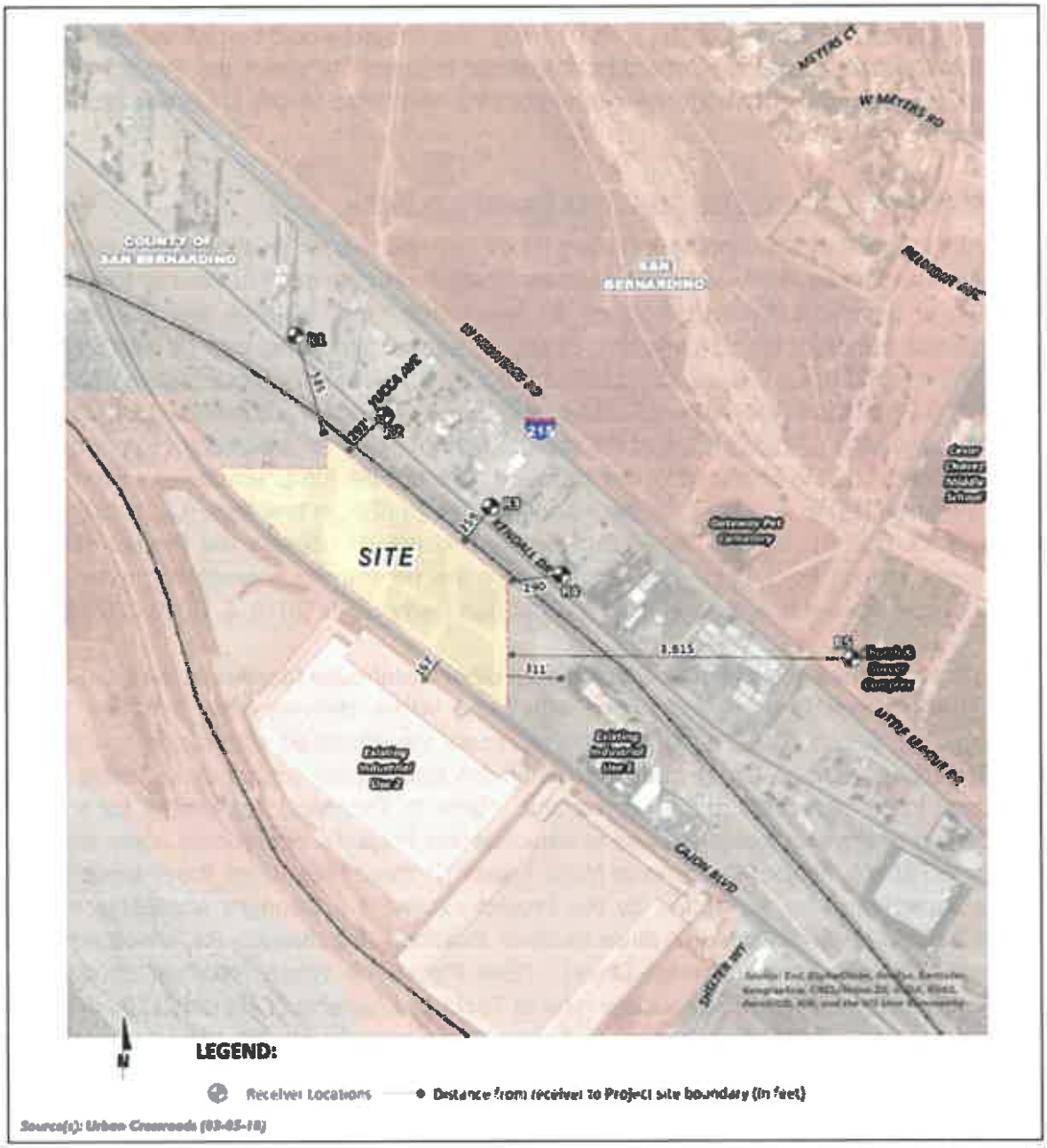


Figure 19

Noise Receiver Locations

Table 6 Project Operational Noise Levels (Without Mitigation)

Receiver Location[1]	Jurisdiction	Noise Level at Receiver Locations (dBA)[2]						Threshold Exceeded?
		L_{eq} (E. Avg.)	L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (Anytime)	
Daytime	**Lowest Residential Noise Level Limits**	**55**	**55**	**60**	**65**	**70**	**75**	-
Nighttime		**45**	**45**	**50**	**55**	**60**	**65**	-
Anytime	**Industrial Limits**	**70**	**70**	**75**	**80**	**85**	**90**	-
R1	County of San Bernardino	39.4	36.4	39.3	43.8	47.6	52.3	No
R2		46.1	43.1	46.1	50.6	54.4	59.0	Yes
R3		48.0	45.0	48.0	52.6	56.3	60.8	Yes
R4		47.0	44.0	46.9	51.5	55.3	59.8	Yes
R5	San Bernardino	32.1	-	-	-	-	-	No
Industrial 1	County of San Bernardino	43.2	40.2	43.0	47.3	51.1	56.1	No
Industrial 2		44.6	41.6	44.0	47.7	51.1	56.4	No

[1]Noise receiver locations are shown on Figure 19.
[2]Estimated Project operational noise levels as shown on Table 9-2 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 9-3)

In order for the Project to reduce operational noise to levels compliant with the County's Development Code, implementation of MM N-1 would require the installation of a minimum 8-foot-tall noise barrier wall along the majority of the northeastern boundary of the Project site and a portion of the eastern boundary of the Project site). As shown in Table 7, *Project Operational Noise Levels (With Mitigation)*, implementation of MM N-1 would reduce the Project's operational noise to levels compliant with the standards established in the County's noise ordinance, and a less-than-significant impact would occur.

Table 7 Project Operational Noise Levels (With Mitigation)

Receiver Location[1]	Jurisdiction	Noise Level at Receiver Locations (dBA)[2]						Threshold Exceeded?[3]
		L_{eq} (E. Avg.)	L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (Anytime)	
Daytime	**Lowest Residential Noise Level Limits**	**55**	**55**	**60**	**65**	**70**	**75**	-
Nighttime		**45**	**45**	**50**	**55**	**60**	**65**	-
R2	County of San Bernardino	41.7	38.7	41.5	45.9	49.7	54.7	No
R3		43.4	40.4	43.3	47.8	51.5	56.2	No
R4		42.5	39.5	42.3	46.8	50.5	55.4	No

[1] Noise receiver locations are shown on Figure 19.
[2] Unmitigated Project operational noise levels as shown on Table 6.
[3] Reference noise level measurement locations as shown on Exhibit 5-A of *Technical Appendix L*.
[4] Observed daytime ambient noise levels as shown on Table 5-1 of *Technical Appendix L*.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance Criteria as defined in Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 9-5)

XII-b) Less-than-Significant Impact.

Impact Analysis for Near-Term Construction Vibration

Construction activities on the Project site would utilize heavy equipment that has the potential to generate low levels of intermittent, localized ground-borne vibration. Refer to *Technical Appendix L* for a detailed description of the methodology used to calculate construction vibration levels.

The County's vibration level standard is a peak particle velocity (PPV) of 0.2 inches per second (0.2 in/sec PPV) at any sensitive receiver locations (SB County, 2018, § 83.01.090). Vibration levels from Project-related construction activities were calculated at five receiver locations near the Project site (see Figure 19 for locations of the modeled receptors). The results of the vibration analysis for Project-related construction activities are summarized in Table 8, *Project Construction Vibration Levels*. As shown in Table 8, Project-related construction activities would not exceed the County's significance threshold of 0.2 in/sec PPV at any off-site receptor location (Urban Crossroads, 2018e, p. 67). Accordingly, the Project's near-term construction activities would not expose persons to or generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

Table 8 Project Construction Vibration Levels

Receiver Location	Distance to Construction Activity (Ft)	Receiver PPV Levels (in/sec)					Threshold Exceeded?[3]
		Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Peak Vibration	
R1	640'	0.000	0.000	0.001	0.001	0.001	No
R2	304'	0.000	0.001	0.002	0.002	0.002	No
R3	274'	0.000	0.001	0.002	0.002	0.002	No
R4	321'	0.000	0.001	0.002	0.002	0.002	No
R5	1,829'	0.000	0.000	0.000	0.000	0.000	No

[1] Receiver locations are shown on Exhibit 10-A of *Technical Appendix L*.
[2] Based on the Vibration Source Levels of Construction Equipment included on Table 6-8 of *Technical Appendix L*.
[3] Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.
Source: (Urban Crossroads, 2018e, Table 10-10)

Impact Analysis for Long-Term Operational Vibration

Under long-term conditions, the proposed Project would not include nor require equipment, facilities, or activities that would result in substantial or perceptible groundborne vibration. Trucks would travel to-and-from the Project site during long-term operation; however, vibration levels for heavy trucks operating at low-to-normal speeds on smooth, paved surfaces – as is expected on the Project site and along surrounding roadways – typically do not exceed 0.004 in/sec PPV, which is lower than the County of San Bernardino vibration threshold of 0.2 in/sec PPV (Urban Crossroads, 2018e, p. 55). Accordingly, long-term operation of the Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels, and a less-than-significant impact would occur.

XII-c) Less-than-Significant Impact.

The Federal Interagency Committee on Noise (FICON) developed guidance to be used for the assessment of project-generated increases in noise levels that take into account the ambient noise environment. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative exposure metrics, such as the average-daily noise level (i.e., CNEL). The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. For example, if the ambient noise environment is very quiet and a new noise source substantially increases localized noise levels, a perceived impact may occur even though the numerical noise threshold might not be exceeded. Therefore, for the purpose of this analysis, when the ambient noise environment is less than 60 dBA CNEL, a 5 dBA or more increase (i.e., "readily perceptible") resulting from Project-related noise is considered cumulatively considerable when noise sensitive receptors are affected. Where the ambient noise levels range from 60 to 65 dBA CNEL, a 3 dBA or more increase (i.e., "barely perceptible") resulting from Project-related noise is considered cumulatively considerable when noise sensitive receptors are affected. In areas where the ambient noise levels exceed 65 dBA CNEL, a 1.5 dBA or more increase resulting from Project-related noise is considered cumulatively considerable when noise sensitive receptors are affected. (Urban Crossroads, 2018e, p. 24)

Stationary Source Impacts

As summarized in Table 9, *Project Operational Noise Levels at Sensitive Receiver Locations*, the Project would not contribute substantial noise at nearby sensitive receptors during daytime (7:00 a.m. - 10:00 p.m.) or nighttime (10:01 p.m. - 6:59 a.m.) hours. Accordingly, the Project would not contribute to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project. Impacts would be less than significant.

Table 9 Project Operational Noise Levels at Sensitive Receiver Locations (In CNEL)

Daytime Noise Levels (7:00 a.m. – 10:00 p.m.)

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Contribution[6]	Threshold Exceeded?[7]
R1	40.0	L1	69.2	69.2	0.0	No
R2	46.1	L2	74.7	74.7	0.0	No
R3	48.0	L2	74.7	74.7	0.0	No
R4	47.0	L2	74.7	74.7	0.0	No
R5	32.1	L3	69.6	69.6	0.0	No

Table 9 Project Operational Noise Levels at Sensitive Receiver Locations (In CNEL) (cont.)

Nighttime Noise Levels (10:01 p.m. – 6:59 a.m.)

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Contribution[6]	Threshold Exceeded?[7]
R1	40.0	L1	65.6	65.6	0.0	No
R2	46.1	L2	73.8	73.8	0.0	No
R3	48.0	L2	73.8	73.8	0.0	No
R4	47.0	L2	73.8	73.8	0.0	No
R5	32.1	L3	67.9	67.9	0.0	No

[1]Noise receiver locations are shown on Figure 19.
[2]Estimated Project stationary source noise levels based on data presented in Table 6.
[3]Reference noise level measurements as shown on Exhibit 5-A of *Technical Appendix L*.
[4]Observed daytime ambient noise levels as shown on Table 5-1 of *Technical Appendix L*.
[5]Represents the combined reference ambient noise levels plus Project operational noise level.
[6]The noise level increase expected with the addition of the Project.
[7]Significance Criteria as defined in Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 9-6 and 9-7)

Traffic-Related Noise Impacts

To evaluate permanent, off-site noise level increases that could result from Project-related traffic, noise levels were modeled for the following traffic scenarios:

- Existing Conditions Without / With Project: This scenario refers to the existing present-day noise conditions without and with the proposed Project.
- Opening Year 2019 Without / With the Project: This scenario refers to Opening Year noise conditions without and with the proposed Project, including reasonably foreseeable cumulative projects identified in the Project's Traffic Impact Analysis (*Technical Appendix L*).
- Horizon Year 2040 Without / With the Project: This scenario refers to Horizon Year noise conditions without and with the proposed Project, including reasonably foreseeable cumulative projects identified in the Project's Traffic Impact Analysis (*Technical Appendix L*).

Traffic noise contours and noise levels were established based on existing and projected future traffic conditions on off-site roadway segments within the Project's study area, and do not take into account the effect of any existing noise barriers or topography that may affect ambient noise levels. Refer to *Technical Appendix L* for a detailed description of the methodology used to evaluate the Project's traffic-related noise effects.

Table 10, *Existing plus Project Traffic Noise Impacts*, presents a comparison of the existing noise conditions along Project study area roadway segments and the noise levels that would result with addition of Project-related traffic. Noise levels along roadway segments within the Project study area would increase between 0.0 to 1.9 dBA CNEL with development of the Project. However, as shown in Table 10, the Project's noise contributions would not exceed the applicable significance thresholds (i.e., ≥1.5 dBA CNEL from Project-related noise to

Table 10 Existing plus Project Traffic Noise Impacts (In CNEL)

ID	Road	Segment	Adjacent Land Use[1]	CNEL at Adjacent Land Use (dBA)[2]			Noise - Sensitive Land Use?	Threshold Exceeded?[3]
				No Project	With Project	Project Addition		
1	Palm Av.	n/o I-215 Fwy.	Commercial (Resid.)	78.4	78.4	0.0	Yes	No
2	Palm Av.	s/o Kendall Dr.	Commercial	73.4	74.0	0.6	No	No
3	Palm Av.	s/o Industrial Pkwy.	Commercial (Vacant)	71.1	72.0	0.9	No	No
4	Palm Av.	s/o Cajon Bl.	Commercial (Vacant)	68.2	69.9	1.7	No	No
5	Cajon Bl.	e/o Dwy. 2	Industrial	66.6	68.5	1.9	No	No
6	Cajon Bl.	w/o Palm Av.	Industrial	67.3	68.9	1.6	No	No

[1]Source: City of San Bernardino General Plan Land Use Element, *Figure LU-1*.
[2]The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.
[3]Significance Criteria as defined in Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 7-7)

nearby noise sensitive land uses). Accordingly, the Project would not result in a substantial permanent increase in noise levels above ambient conditions. Therefore, the Project's off-site, traffic-related noise impacts would be less than significant under Existing plus Project conditions.

Table 11, *Opening Year 2019 Traffic Noise Impacts*, presents a comparison of the calculated 2019 noise conditions along Project study area roadway segments and the noise levels that would result with addition of Project-related traffic. Noise levels along roadway segments within the Project study area would increase between 0.0 to 1.5 dBA CNEL with development of the Project. As shown in Table 11, the Project's noise contributions would not exceed the applicable significance thresholds (i.e., ≥1.5 dBA CNEL from Project-related noise to nearby noise sensitive land uses). Accordingly, the Project would not result in a substantial permanent increase in noise levels above ambient conditions. Therefore, the Project's off-site traffic-related noise impacts would be less than significant under Opening Year 2019 development conditions.

Table 12, *Horizon Year 2040 Traffic Noise Impacts*, presents a comparison of the calculated 2040 noise conditions along Project study area roadway segments and the noise levels that would result with addition of Project-related traffic. Noise levels along roadway segments within the Project study area would increase between 0.0 to 1.0 dBA CNEL with development of the Project. As shown in Table 12, the Project's noise contributions would not exceed the applicable significance thresholds (i.e., ≥1.5 dBA CNEL from Project-related noise to nearby noise sensitive land uses). Accordingly, the Project would not result in a substantial permanent increase in noise levels above ambient conditions. Therefore, the Project's off-site traffic-related noise impacts would be less than significant under Horizon Year 2040 development conditions.

Table 11 Opening Year 2019 Traffic Noise Impacts (In CNEL)

ID	Road	Segment	Adjacent Land Use[1]	CNEL at Adjacent Land Use (dBA)[2]			Noise - Sensitive Land Use?	Threshold Exceeded?[3]
				No Project	With Project	Project Addition		
1	Palm Av.	n/o I-215 Fwy.	Commercial (Resid.)	78.7	78.7	0.0	Yes	No
2	Palm Av.	s/o Kendall Dr.	Commercial	75.2	75.6	0.4	No	No
3	Palm Av.	s/o Industrial Pkwy.	Commercial (Vacant)	72.5	73.2	0.7	No	No
4	Palm Av.	s/o Cajon Bl.	Commercial (Vacant)	69.8	71.0	1.2	No	No
5	Cajon Bl.	e/o Dwy. 2	Industrial	67.8	69.3	1.5	No	No
6	Cajon Bl.	w/o Palm Av.	Industrial	68.3	69.7	1.3	No	No

[1]Source: City of San Bernardino General Plan Land Use Element, *Figure LU-1*.
[2]The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.
[3]Significance Criteria as defined in Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 7-8)

Table 12 Horizon Year 2040 Traffic Noise Impacts (In CNEL)

ID	Road	Segment	Adjacent Land Use[1]	CNEL at Adjacent Land Use (dBA)[2]			Noise-Sensitive Land Use?	Threshold Exceeded?[3]
				No Project	With Project	Project Addition		
1	Palm Av.	n/o I-215 Fwy.	Commercial (Resid.)	79.4	79.4	0.0	Yes	No
2	Palm Av.	s/o Kendall Dr.	Commercial	75.8	76.1	0.3	No	No
3	Palm Av.	s/o Industrial Pkwy.	Commercial (Vacant)	73.1	73.7	0.6	No	No
4	Palm Av.	s/o Cajon Bl.	Commercial (Vacant)	71.0	71.9	1.0	No	No
5	Cajon Bl.	e/o Dwy. 2	Industrial	71.4	72.1	0.7	No	No
6	Cajon Bl.	w/o Palm Av.	Industrial	71.4	72.1	0.7	No	No

[1]Source: City of San Bernardino General Plan Land Use Element, *Figure LU-1*.
[2]The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.
[3]Significance Criteria as defined in Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2018e, Table 7-9)

In summary, long-term operation of the proposed Project would not generate a substantial permanent increase in off-site, traffic-related noise levels. The Project's traffic-related noise impacts would be less than significant.

XII-d) **Less-than-Significant Impact.** The Project's only potential to cause a substantial temporary or periodic increase in ambient noise levels would occur during the construction phase. Construction activities on the Project site, especially those activities involving the use of heavy equipment, would create intermittent, temporary increases in ambient noise levels in the vicinity of the Project site. Noise generated by heavy construction equipment, including trucks, graders, bulldozers, concrete mixers, and portable generators, can reach high levels. However, construction-related noise increases: 1) would be transitory (i.e., varying from day-to-day and throughout the day), 2) would completely cease upon completion of Project construction, and 3) would not represent a recurring, periodic source of noise, although periodic and temporary construction noise has the potential to be substantial compared to existing ambient noise levels.

As discussed above under Threshold XIII-a, the Project's construction-related activity is required to comply with the County's Noise Ordinance (Development Code § 83.01.080). Regardless of the Project's consistency with the County's Noise Ordinance, construction activities on the Project site, especially those activities involving heavy equipment, would create intermittent, temporary increases in ambient noise levels that have the potential to adversely affect sensitive receptors in the vicinity of the Project site. The Project's construction-related noise levels are presented in Table 13, *Project Construction Noise Level Summary (Without Mitigation)*, as measured at the sensitive receptor locations previously depicted on Figure 19 and based on reference noise levels collected from construction sites throughout Southern California (refer to *Technical Appendix L* for a detailed description of reference construction noise levels).

As shown on Table 13, Project-related construction activities are estimated to reach maximum noise levels between 48.3 and 64.8 equivalent-level decibels (dBA Leq) when measured at nearby sensitive receptors. Noise levels less than 65 dBA Leq are not considered to be excessive for sensitive receptors; therefore; therefore, the Project's temporary or periodic noise impacts would be less-than-significant and mitigation would not be required. (Urban Crossroads, 2018e, p. 65)

Table 13 Project Construction Noise Level Summary (Without Mitigation)

Receiver Location	Construction Noise Levels (dBA Leq)					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Peak
R1	57.4	57.4	46.0	49.5	45.3	57.4
R2	63.9	63.9	52.5	55.9	51.8	63.9
R3	64.8	64.8	53.4	56.8	52.7	64.8
R4	63.4	63.4	52.0	55.4	51.3	63.4
R5	48.3	48.3	36.9	40.3	36.2	48.3

Source: (Urban Crossroads, 2018e, Table 10-7)

XII-e) **No Impact.** The Project site is not located within an airport land use plan or within two miles of a public airport. Accordingly, the proposed Project would not expose people residing or working in the Project area to excessive noise levels. No impact would occur.

XII-f) **No Impact.** There are no private airfields or airstrips in the vicinity of the Project site. Therefore, the Project would not expose people to excessive noise levels associated with operations at a private airstrip. No impact would occur.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measure is required a condition of Project approval to reduce these impacts to a level considered less than significant:

MM N-1: Prior to issuance of a certificate of occupancy, the County of San Bernardino Building Division shall verify that a minimum 8-foot high noise barrier is constructed along the perimeter of the truck loading/loading dock area, as shown on Exhibit 9-A of the Project's Noise Study (*Technical Appendix L*). The noise barrier shall provide a weight of at least four (4) pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways. The barrier shall provide a minimum transmission loss of 20 dBA and must present a solid face from top to bottom. All gaps (except weep holes) shall be filled with grout or caulking. The noise barrier shall be constructed using the following materials: masonry block; earthen berm; or any combination of construction materials capable of the minimum weight of 4 pounds per square foot and a minimum transmission loss of 20 dBA.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING				
Would the project:				
a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
SUBSTANTIATION:				

XIII-a) **No Impact.** The Project would develop the subject property in accordance with the land use designation applied to the site by the County of San Bernardino General Plan and the GHSP (i.e., Heavy Industrial). Accordingly, the proposed Project would not result in growth that was not already anticipated by the County of San Bernardino General Plan and evaluated in the County of San Bernardino General Plan FEIR. Furthermore, the Project site is served by existing public roadways, and utility infrastructure is already installed beneath public rights of way that abut the property. The Project would improve Cajon Boulevard along its frontage and would connect to existing utility infrastructure. In doing so, the Project would be in conformance with the General Plan, the GHSP, and applicable infrastructure master plans. Accordingly, the Project and its required improvements would not induce direct or indirect substantial growth in the area and impacts would be less than significant.

XIII-b) **No Impact.** The Project site does not contain permanent housing under existing conditions. Accordingly, implementation of the Project would not displace substantial numbers of existing housing and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

XIII-c) **No Impact.** The Project site does not contain permanent residential structures and no people live on the subject property under existing conditions. Accordingly, implementation of the proposed Project would not displace substantial numbers of people and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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?				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒
SUBSTANTIATION:				

XIV-a) **Less-than-Significant Impact.** Fire protection services to the Project site are provided by the San Bernardino County Fire Department (SBCFD). The Project site is served by San Bernardino County Fire Station No. 232, located at 6065 Palm Avenue (approximately 1.8 roadway miles to the southeast of the Project site) and Devore Fire Station No. 2, located at 1511 Devore Road (approximately 2.8 roadway miles to the northwest of the Project site). Based on the Project site's proximity to two existing fire stations the Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. The Project is required to comply with the provisions of the County of San Bernardino Fire Protection District Fee Ordinance (Ordinance No. FPD-01), which requires a fee payment that the County applies to the funding of fire protection facilities. Mandatory compliance with Ordinance No. FPD-01 would be required prior to the issuance of a building permit. In addition, property tax revenues generated from development of the site would also provide funding to offset potential increases in the demand for fire protection at Project build-out.

The Project would feature a minimum of fire safety and fire suppression activities, including type of building construction, fire sprinklers, a fire hydrant system, and paved access. The proposed building would be of concrete tilt-up construction that contains a low fire hazard risk rating. In addition, a fire alarm system is proposed to be installed, as well as ESFR (Early Suppression, Fast Response) ceiling mounted fire sprinklers. ESFR provides protection that exceeds that of in-rack systems. ESFR high output, high volume systems are located in ceiling spaces as with conventional fire sprinkler systems, but they incorporate large, high-volume, high-pressure heads to provide the necessary fire protection for warehouse buildings that may contain high-piled storage. While most other sprinklers are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean it will extinguish the fire but rather it is meant to "knock" the fire back down to its source.

Based on the foregoing, the proposed Project would receive adequate fire protection service and would not result in the need for new or physically altered fire protection facilities. Impacts to fire protection facilities would be less than significant.

XIV-b) **Less-than-Significant Impact.** The Project would introduce a new warehouse building and employees and visitors to the Project site, which would result in an incremental increase in demand for police protection services, but is not anticipated to require or result in the construction of new or physically altered police facilities. Furthermore, property tax revenues generated from development of the site would provide funding to offset potential increases in the demand for police services at Project build-out. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities. Impacts to police protection facilities would therefore be less than significant.

XIV-c) **Less-than-Significant Impact.** The Project would not create a direct demand for public school services, as the subject property would contain non-residential uses that would not generate any school-aged children requiring public education. The proposed Project is not expected to draw a substantial number of new residents to the region and would, therefore, not indirectly generate school-aged students requiring public education. Because the proposed Project would not directly generate students and is not expected to indirectly draw students to the area, the proposed Project would not cause or contribute to a need to construct new or physically altered public school facilities. Although the Project would not create a direct demand for additional public-school services, the Project Applicant would be required to contribute development impact fees to the San Bernardino City Unified School District in compliance with California Senate Bill 50 (Greene), which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs. Mandatory payment of school fees would be required prior to the issuance of building permits. Impacts to public schools would be less than significant.

XIV-d) **No Impact.** As discussed under Thresholds XVI-a and XVI-b below, the Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the Project would not adversely affect any park facility. Thus, no impact would occur.

XIV-e) **No Impact.** The Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, public health facilities, and/or animal shelters. As such, implementation of the Project would not adversely affect other public facilities or require the construction of new or modified public facilities and no impact would occur.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
Would the project:				
a) Would the project increase the use of existing neighborhood or 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?	☐	☐	☐	☒
SUBSTANTIATION:				

XV-a) **No Impact.** The Project would develop the subject property with industrial land uses. The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, thus, no impact would occur and no further analysis of this subject is required.

XV-b) **No Impact.** The Project does not propose to construct any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Therefore, environmental effects related to the construction or expansion of recreational facilities would not occur.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION / TRAFFIC				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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?				
a) 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) 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?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
SUBSTANTIATION:				

A *Traffic Impact Analysis* was prepared for the Project by Urban Crossroads to evaluate the potential circulation system deficiencies that may result from the development of the proposed Project and to recommend improvements to achieve acceptable circulation system operational conditions. This report is included as *Technical Appendix M* to this Initial Study and its findings are incorporated into the analysis presented herein.

XVI-a) Less-than-Significant Impact with Mitigation Incorporated.

Project Study Area

The Project's traffic impact study area (hereafter "Project study area" or "study area") represents the transportation facilities that would receive the greatest volumes of project-related traffic and have the potential to be significantly impacted. The study area was based on the County of San Bernardino Traffic Study Guidelines and consultation with County of San Bernardino staff. The study area includes the intersections listed in Table 14, *Intersections Analysis Locations* (Urban Crossroads, 2018f, p. 4).

Table 14 Intersections Analysis Locations

ID	Intersection Location	Jurisdiction	CMP?
1	Driveway 1 & Cajon Boulevard – Future Int.	County and City of San Bernardino	No
2	Driveway 2 & Cajon Boulevard – Future Int.*	County and City of San Bernardino	No
3	Institution Road & Cajon Boulevard	City of San Bernardino	No
4	Palm Avenue & Institution Road	City of San Bernardino	No
5	Palm Avenue & Industrial Parkway	City of San Bernardino	No
6	Palm Avenue & I-215 Southbound Ramps*	Caltrans, City of San Bernardino	No
7	Palm Avenue & I-215 Northbound Ramps*	Caltrans, City of San Bernardino	No

Source: (Urban Crossroads, 2018f)

Existing traffic counts were collected in the study area in January 2018 during typical weekday peak hour traffic conditions (Urban Crossroads, 2018f, p. 35). Based on the collected traffic counts, all intersections in the Project study area operate at a level of service (LOS) of "D" or better during the AM and PM peak hours (7:00am-9:00am and 4:00pm-6:00pm, respectively) (Urban Crossroads, 2018f, Table 3-1). Refer to *Technical Appendix M* for more information about LOS definitions and existing traffic conditions in the Project's study area.

Thresholds of Significance

For purpose of evaluation herein, the Project would result in a significant direct impact to the County of San Bernardino, Caltrans, and/or City of San Bernardino circulation system if any of the following situations occur (Urban Crossroads, 2018f, pp. 22-23):

County of San Bernardino Circulation Facilities:

- ❑ A direct impact would occur if the Project would cause any study area intersection to degrade from an acceptable level of service (LOS D or better) to an unacceptable level of service (LOS E or LOS F).
- ❑ A cumulatively considerable impact would occur if the Project would contribute substantial traffic (i.e., 50 or more trips at a signalized intersection or 10 or more trips at an unsignalized intersection) to an intersection that already operates at an unacceptable level of service (LOS E or F) without the Project.

City of San Bernardino Circulation Facilities:

- ❑ A direct impact would occur if: 1) an intersection operates at level of service (LOS) C without the Project and the addition of Project traffic would change the volume-to-capacity (v/c) ratio at the intersection by more than 0.04; or 2) an intersection operates at LOS D without the Project and the addition of Project traffic would change the v/c ratio

at the intersection by more than 0.02; or 3) an intersection operates at LOS E or F without the Project and the addition of Project traffic would change the v/c ratio at the intersection by more than 0.01.

- ☐ A cumulatively considerable impact would occur if: 1) an intersection operates at level of service (LOS) C with cumulative traffic, but without the Project, and the addition of Project traffic would change the volume-to-capacity (v/c) ratio at the intersection by more than 0.04; or 2) an intersection operates at LOS D with cumulative traffic, but without the Project, and the addition of Project traffic would change the v/c ratio at the intersection by more than 0.02; or 3) an intersection operates at LOS E or F with cumulative traffic, but without the Project, and the addition of Project traffic would change the v/c ratio at the intersection by more than 0.01.

Caltrans Circulation Facilities:

- ☐ A direct impact would occur if the Project would cause any Caltrans facility in the study area intersection to degrade from an acceptable level of service (LOS D or better) to an unacceptable level of service (LOS E or LOS F).
- ☐ A cumulatively considerable impact would occur if the Project would contribute substantial traffic (i.e., 50 or more trips) to a Caltrans facility that already operates at an unacceptable level of service (LOS E or F) without the Project.

Project Trip Generation and Distribution

Trip generation represents the amount of traffic that is attracted to and produced by a development project. Based on land use-specific vehicle trip generation rates published by the Institute of Transportation Engineers (ITE), the Project is calculated to generate approximately 560 daily vehicle trips, including 55 trips during the AM peak hour and 61 trips during the PM peak hour (Urban Crossroads, 2018f, Table 4-2).

Of the Project's estimated 560 daily vehicle trips, 112 trips would be from trucks with two or more axles, which take up more space on the roadway and take longer to speed up and slow down than passenger cars. In conformance with standard traffic engineering practices in Southern California, the Project's daily vehicle trips were converted to a passenger car equivalent (PCE). PCE factors allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit (i.e., the passenger car), for purposes of capacity and LOS analyses and more accurately assess the effects of trucks on the circulation network. A PCE factor of 1.5 was applied to two-axle truck trips, a factor of 2.0 was applied to three-axle truck trips, and a factor of 3.0 was applied to four plus-axle truck trips. After converting Project trips to PCE, the Project is calculated to produce an estimated 732 daily PCE trips, including 70 PCE trips during the AM peak hour and 79 PCE trips during the PM peak hour (112 PCE trips from trucks). (Urban Crossroads, 2018f, Table 4-2) For more information about the Project's trip generation, refer to *Technical Appendix M*.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the routes where Project traffic would distribute. The trip distribution for the proposed Project was developed based on anticipated passenger car and truck travel patterns to-and-from the Project site. The

total volume on each roadway was divided by the Project's total traffic generation to indicate the percentage of Project traffic that would use each component of the roadway system in each relevant direction. The Project's trip distribution patterns are graphically depicted on Figure 20, *Project Truck Trip Distribution*, and Figure 21, *Project Car Trip Distribution*.

The assignment of traffic from the Project site to the adjoining roadway system is based on the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, PCE factored Project average daily traffic (ADT) volumes for the weekday are shown on Figure 22, *Project Average Daily Traffic*.

Analysis Scenarios

The Project's potential impacts to traffic and circulation have been assessed for each of the following conditions:

- Near-term construction;
- Existing (2018) plus Project;
- Opening Year (2019) and cumulative development projects with and without Project
- Horizon Year (2040) and cumulative development projects with and without Project

The Near-term Construction conditions analysis determines the potential for the Project's construction-related traffic to result in an adverse effect to the local roadway system. Types of traffic anticipated during construction include construction workers traveling to/from the Project site as well as deliveries of construction materials to the Project site.

The Existing (2018) plus Project (E+P) analysis determines direct Project-related traffic impacts that would occur on the roadway system under the theoretical scenario where the Project is added to existing conditions. The E+P scenario is presented to disclose direct impacts as required by CEQA. In the case of the proposed Project, the estimated time period between the commencement of the Project's environmental review (2018) and estimated Project buildout (2019) is one year. During this time period, traffic conditions are not static – other projects are being constructed, the transportation network is evolving, and traffic patterns are changing. Therefore, the E+P scenario is very unlikely to materialize in real world conditions and thus does not accurately describe the environment that will exist when the proposed Project is constructed and becomes operational. Regardless, the Existing plus

Figure 20 Project Truck Trip Distribution

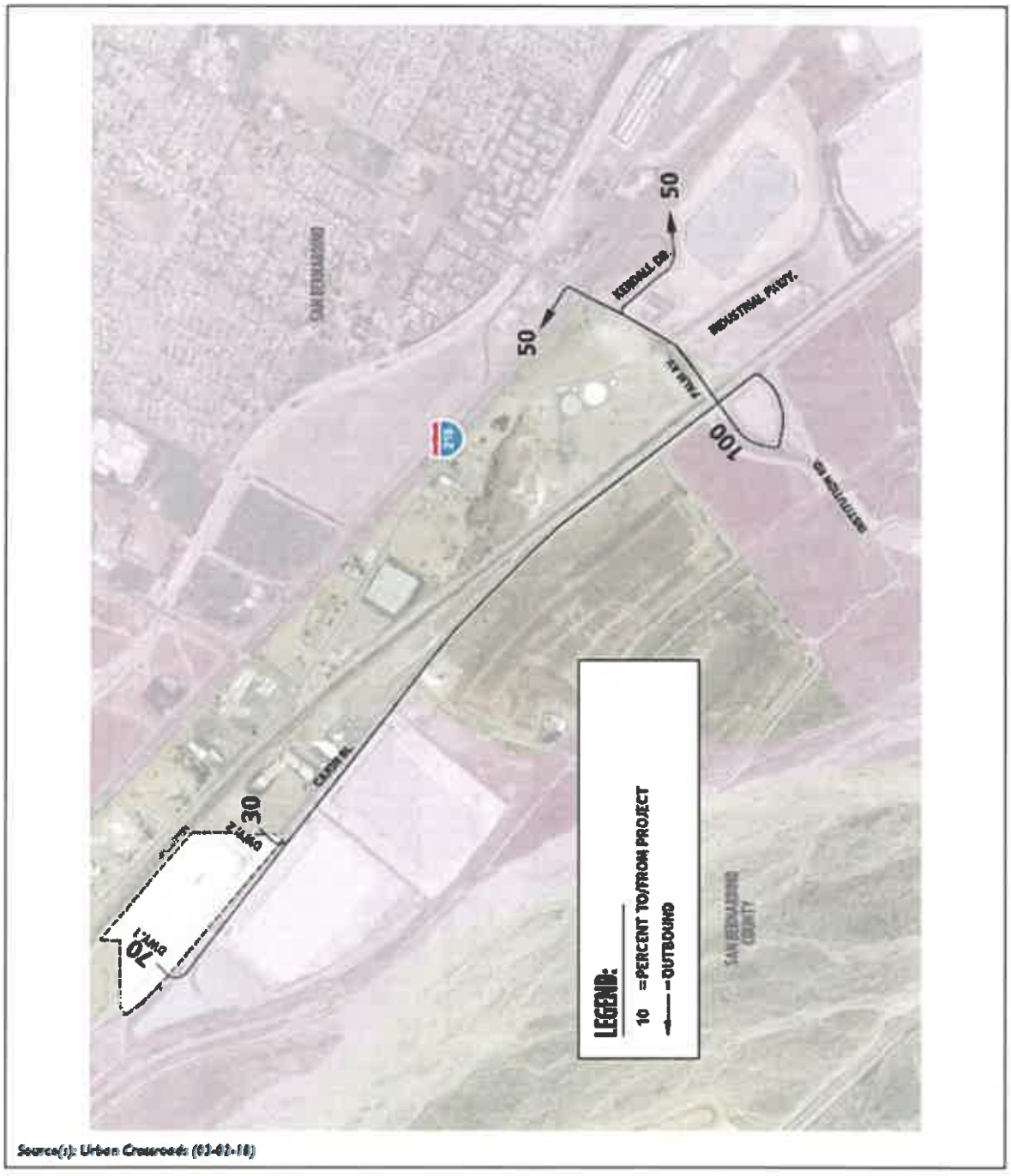
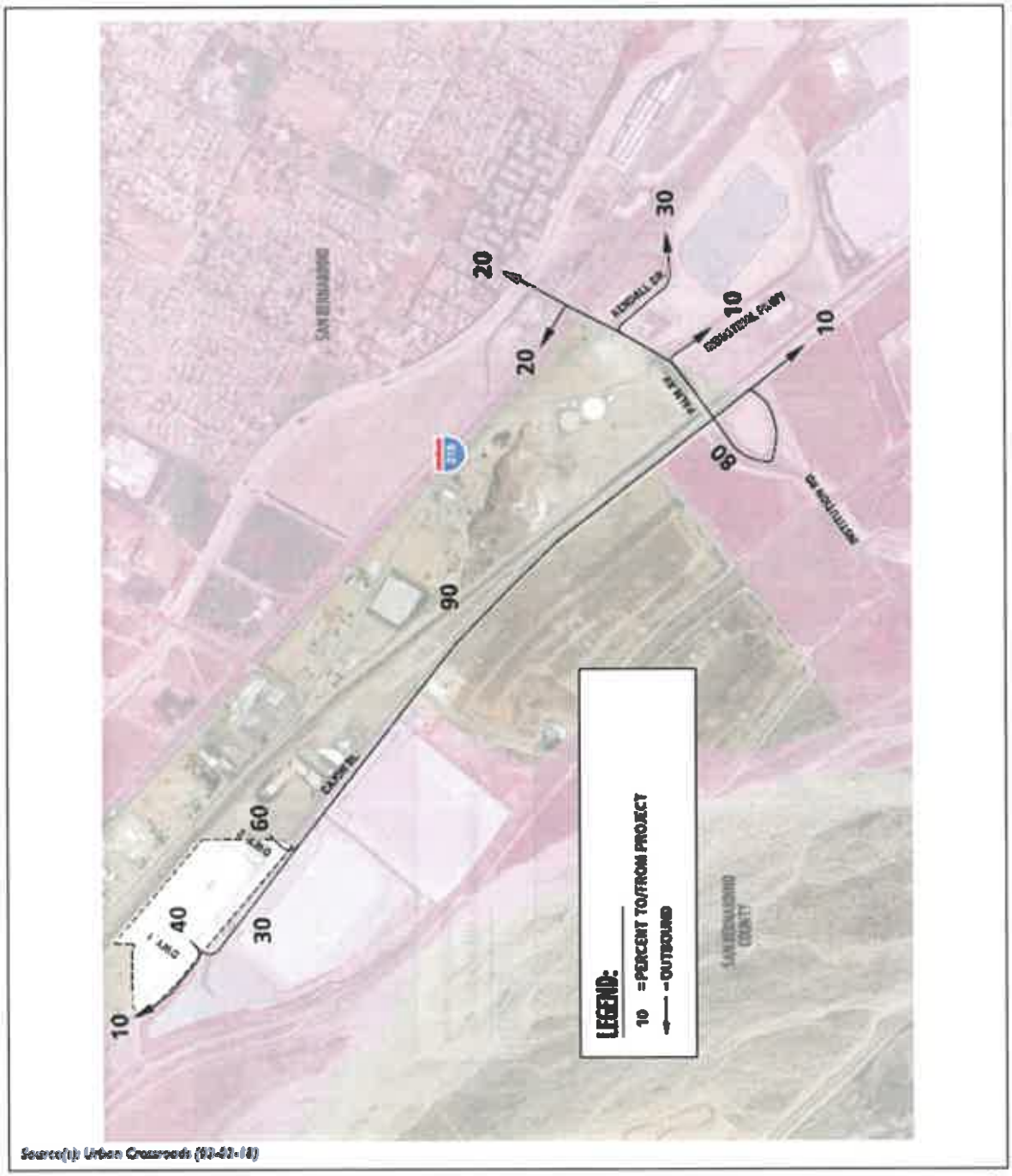


Figure 20

NOT TO SCALE

Project Truck Trip Distribution

Figure 21 Project Car Trip Distribution



Source(s): Urban Crossroads (03-02-18)

Figure 21

NOT TO SCALE

Project Car Trip Distribution

Figure 22 Project Average Daily Traffic

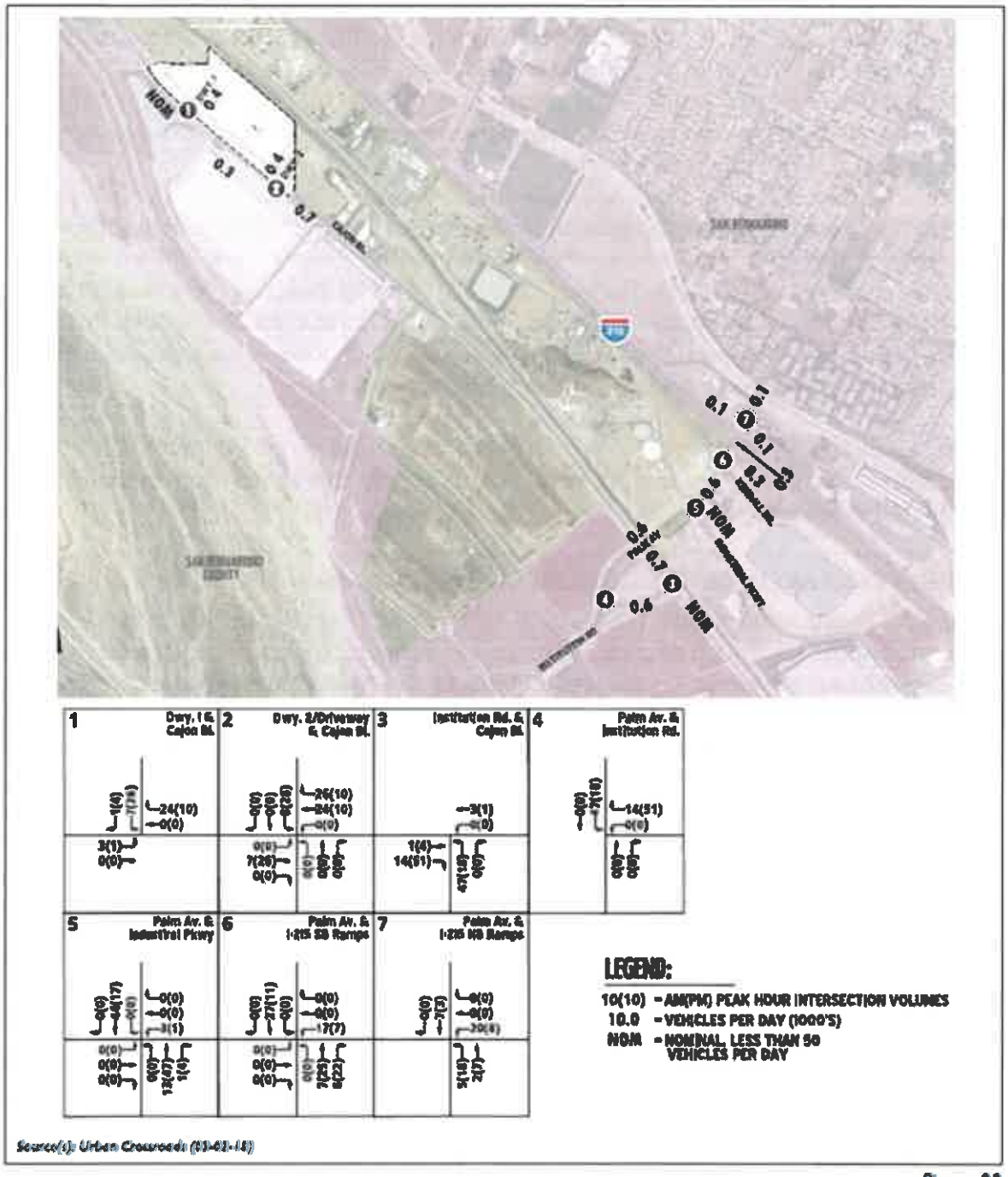


Figure 22

NOT TO SCALE

Project Average Daily Traffic

Project scenario is evaluated to satisfy CEQA requirements to identify the Project's impacts to the existing environment.

The Opening Year (2019) analysis includes an evaluation of traffic conditions at the Project's "opening year." In the case of the Project, 2018 represents the existing condition and the Opening Year is defined as 2019. The Opening Year (2019) analysis is utilized to determine the Project's contribution to potential cumulative traffic impacts within the study area with consideration of existing traffic + ambient growth + Project-related traffic + traffic from reasonably foreseeable cumulative development projects (refer to the list of projects provided in Table 4-3 in *Technical Appendix M*).

The Horizon Year (2040) conditions analysis determines the potential for long-term cumulative circulation system deficiencies when the San Bernardino County General Plan reaches full buildout in the year 2040. The Horizon Year (2040) traffic forecasts were derived from the Southern California Association of Governments (SCAG) transportation model. In addition, traffic associated with reasonably foreseeable cumulative projects in the area was also added in addition to Project traffic for Horizon Year (2040) conditions.

Refer to *Technical Appendix M* for a detailed discussion of the methodologies and assumptions for each analysis scenario, and a list of cumulative development projects considered in the analysis.

Impact Analysis for Near-term Construction Traffic Conditions

During the construction phase of the Project, traffic to-and-from the subject property would be generated by activities such as construction employee trips, delivery of construction materials, and use of heavy equipment. Vehicular traffic associated with construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities, especially because construction activities typically begin/end outside of the peak hour; therefore, a majority of the construction employees would not be driving to/from the Project site during hours of peak congestion. Traffic from construction workers is not expected to result in a substantial adverse effect to the local roadway system because most trips would occur during non-peak hours. Deliveries of construction materials to the Project site would also have a nominal effect to the local roadway network because most trips would occur during non-peak hours. Construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. As most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase based on need. Accordingly, traffic generated by the Project's construction phase would not result in a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Impacts during the Project's construction phase would be less than significant.

Impact Analysis for Existing plus Project (E+P) Traffic Conditions

Study area intersection levels of service for E+P conditions are summarized in Table 15, *Existing plus Project Intersections Analysis*, Intersections Analysis. As shown in Table 15, one intersection (Intersection #6) would operate at an unacceptable LOS under E+P traffic conditions, while all other intersections would operate at acceptable LOS. The Project's impact to Intersection #6 is determined to be significant and mitigation is required. The Project's impacts to all other study area intersections would be less than significant.

Table 15 Existing plus Project Intersections Analysis

#	Intersection	Traffic Control[2]	Existing (2018)						E+P						Δ v/c Difference		Significant Impact?
			Delay[1] (secs.)		Level of Service		Average v/c[3]		Delay[1] (secs.)		Level of Service		Average v/c[3]				
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1	Dwy. 1 & Cajon Bl.	--/CSS	Does Not Exist				--	--	9.4	9.6	A	A	--	--	--	--	No
2	Dwy. 2 & Cajon Bl.	CSS	0.0	0.0	A	A	--	--	9.9	10.1	A	B	--	--	--	--	No
3	Institution Rd. & Cajon Bl.	AWS	8.3	8.3	A	A	--	--	8.6	8.4	A	A	--	--	--	--	No
4	Palm Av. & Institution Rd.	AWS	8.8	10.1	A	B	--	--	9.3	10.9	A	B	--	--	--	--	No
5	Palm Av. & Industrial Pkwy.	AWS	10.1	14.0	B	B	--	--	10.8	17.1	B	C	--	--	--	--	No
6	Palm Av. & I-215 SB Ramps	TS	51.6	40.6	D	D	0.87	0.58	**61.3**	41.3	E	D	0.93	0.59	**0.06**	0.01	**Yes**
7	Palm Av. & I-215 NB Ramps	TS	19.8	21.7	B	C	--	0.67	19.9	21.8	B	C	--	0.70	--	0.03	No

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the HCM (6th Edition), overall average intersection delay and LOS are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; AWS = All Way Stop; TS = Traffic Signal; CSS = Improvement
[3] Volume to capacity ratio has been reported using the HCM 2000 methodology (as HCM 6th Edition does not report the overall v/c) for intersections operating at LOS C or worse, consistent with the City of San Bernardino Traffic Impact Study Guidelines.
Source: (Urban Crossroads, 2018f , Table 5-1)

To mitigate the Project's significant impact to Intersection #6, Mitigation Measure MM T-1 would require the Project Applicant to facilitate improvements to the southbound leg of Intersection #6 to improve LOS during peak hours. As shown in Table 16, Existing plus Project Intersections Analysis (With Improvements), implementation of MM T-1 would improve the LOS at Intersection #6 to an acceptable level (LOS D) and reduce the Project's impact to less than significant.

Table 16 Existing plus Project Intersections Analysis (With Improvements)

Intersection #6	Traffic Control[3]	Intersection Approach Lanes[1]												Delay[2] (secs.)		Level of Service	
		Northbound			Southbound			Eastbound			Westbound						
		L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
Palm Av. & I-215 SB Ramps																	
• Existing																	
o Without Improvements	TS	1	2	0	1	2	0	0	1	d	0	1	0	51.6	40.6	D	D
• Existing plus Project																	
o Without Improvements	TS	1	2	0	1	2	0	0	1	d	0	1	0	**61.3**	41.3	**E**	D
o With Improvements	TS	1	2	0	2	2	0	0	1	d	0	1	0	47.9	38.1	D	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.
L = Left; T = Through; R = Right; d = Defacto Right Turn Lane;1 = Improvement
[2] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[3] TS = Traffic Signal; AWS = All Way Stop
Source: (Urban Crossroads, 2018f, Table 5-3)

Impact Analysis for Opening Year (2019) Traffic Conditions

As shown in Table 17, *Opening Year Intersections Analysis*, all intersections in the Project study area would operate at acceptable LOS under Opening Year (2019) traffic conditions, with the exception of Intersections #5 and #6. The Project would contribute more than 50 peak hour trips at Intersections #5 and #6; therefore, the Project's contribution to the LOS deficiencies at these intersection under Opening Year (2019) traffic conditions would be cumulatively considerable and mitigation is required. The Project's impacts to all other study area intersections would be less than significant.

Table 17 Opening Year Intersections Analysis

#	Intersection	Traffic Control[2]	2019 Without Project						2019 With Project						Δ v/c Difference		Significant Impact?
			Delay[1] (secs.)		Level of Service		Average v/c[3]		Delay[1] (secs.)		Level of Service		Average v/c[3]				
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1	Dwy. 1 & Cajon Bl.	–/CSS	Does Not Exist				–	–	9.7	9.9	A	A	–	–	–	–	No
2	Dwy. 2 & Cajon Bl.	CSS	0.0	0.0	A	A	–	–	10.4	10.5	B	B	–	–	–	–	No
3	Institution Rd. & Cajon Bl.	AWS	8.9	9.3	A	A	–	–	9.3	9.7	A	A	–	–	–	–	No
4	Palm Av. & Institution Rd.	AWS	10.4	15.0	B	B	–	–	11.3	18.2	B	C	–	–	–	–	No
5	Palm Av. & Industrial Pkwy.	AWS	14.9	**55.5**	B	**F**	–	–	16.7	**76.8**	C	**F**	–	–	–	–	**Yes**
6	Palm Av. & I-215 SB Ramps	TS	**126.7**	**81.6**	**F**	**F**	1.25	0.87	**133.5**	**85.4**	**F**	**F**	1.28	0.90	0.03	0.03	**Yes**
7	Palm Av. & I-215 NB Ramps	TS	23.6	43.7	C	D	0.50	0.98	23.8	47.8	C	D	0.52	1.00	0.02	0.02	No

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; AWS = All Way Stop; TS = Traffic Signal; CSS = Improvement
[3] Volume to capacity ratio has been reported using the HCM 2000 methodology (as HCM 6th Edition does not report the overall v/c) for intersections operating at LOS C or worse, consistent with the City of San Bernardino Traffic Impact Study Guidelines.
Source: (Urban Crossroads, 2018f , Table 6-1)

To mitigate the Project's cumulatively considerable impacts to Intersection #5, Mitigation Measure MM T-2 would require the Project Applicant to make a fair share fee payment to the

intersection improvements specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis" (*Technical Appendix M*). As shown in Table 18, *Opening Year (2019) Intersection Analysis (With Improvements)*, implementation of MM T-2 would provide the proper funds to install a traffic signal at Intersection #5, thereby improving the LOS at Intersection #5 to an acceptable level (LOS C) and reducing the Project's significant cumulative traffic impact to less-than-significant. MM T-1, as previously described under the E+P analysis, would improve the LOS at Intersection #6 to an acceptable level (LOS D) and reduce the Project's impact to less than significant, as shown in Table 18.

Table 18 Opening Year (2019) Intersection Analysis (With Improvements)

Intersection	Traffic Control[3]	Intersection Approach Lanes[1]												Delay[2] (secs.)		Level of Service	
		Northbound			Southbound			Eastbound			Westbound						
		L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
Int. #5: Palm Av. & Industrial Pkwy.																	
• 2019 Without Project																	
o Without Improvements	AWS	1	1	1	1	1	1	0	1	0	1	1	1	**14.9**	**55.5**	B	**F**
o With Improvements	**TS**	1	1	1	1	1	1	0	1	0	1	1	1	15.4	22.9	B	C
• 2019 With Project																	
o Without Improvements	AWS	1	1	1	1	1	1	0	1	0	1	1	1	**16.7**	**76.8**	C	**F**
o With Improvements	**TS**	1	1	1	1	1	1	0	1	0	1	1	1	15.4	26.1	B	C
Int #6: Palm Av. & I-215 SB Ramps																	
• 2019 Without Project																	
o Without Improvements	TS	1	2	1	1	2	0	0	1	d	0	1	0	**126.7**	**81.6**	F	**F**
o With Improvements	TS	1	2	1	**2**	2	0	0	1	d	0	1	0	**47.7**	40.1	D	D
• 2019 With Project																	
o Without Improvements	TS	1	2	1	1	2	0	0	1	d	0	1	0	**133.5**	**85.4**	**F**	**F**
o With Improvements	TS	1	2	1	**2**	2	0	0	1	d	0	1	0	**49.0**	42.0	D	D

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; d = Defacto Right Turn Lane;1 = Improvement

[2] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

[3] TS = Traffic Signal; AWS = All Way Stop

Source: (Urban Crossroads, 2018f, Table 6-3)

Impact Analysis for Horizon Year (2040) Traffic Conditions

As shown in Table 19, *Horizon Year Intersections Analysis*, all intersections in the Project study area would operate at acceptable LOS under Horizon Year (2040) traffic conditions, with the exception of Intersections #4 through #7. The Project would contribute more than 50 peak hour trips at Intersections #4 through #7; therefore, the Project's contribution to the LOS deficiency at these intersection under Horizon Year (2040) traffic conditions would be cumulatively considerable and mitigation is required.

Table 19 Horizon Year Intersections Analysis

#	Intersection	Traffic Control[2]	2040 Without Project						2040 With Project						Δ v/c Difference		Significant Impact?
			Delay[1] (secs.)		Level of Service		Average v/c[3]		Delay[1] (secs)		Level of Service		Average v/c[3]				
			AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	
1	Dwy. 1 & Cajon Bl.	–/CSS	Does Not Exist				–	–	9.8	10.1	A	B	–	–	–	–	No
2	Dwy. 2 & Cajon Bl.	CSS	0.0	0.0	A	A	–	–	10.6	10.8	B	B	–	–	–	–	No
3	Institution Rd. & Cajon Bl.	AWS	9.8	12.1	A	B	–	–	10.3	13.2	B	B	–	–	–	–	No
4	Palm Av. & Institution Rd.	AWS	13.1	67.1	B	F	–	–	15.2	98.5	C	F	–	–	–	–	Yes
5	Palm Av. & Industrial Pkwy.	AWS	25.2	125.5	D	F	–	–	33.4	157.2	D	F	–	–	–	–	Yes
6	Palm Av. & I-215 SB Ramps	TS	>200	114.9	F	F	1.51	1.05	>200	117.7	F	F	1.54	1.09	0.03	0.04	Yes
7	Palm Av. & I-215 NB Ramps	TS	39.0	103.2	D	F	0.81	1.17	40.6	110.5	D	F	0.82	1.19	0.01	0.02	Yes

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] Per the HCM (6th Edition), overall average intersection delay and LOS are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.
[2] CSS = Cross-street Stop; AWS = All Way Stop; TS = Traffic Signal; CSS = Improvement
[3] Volume to capacity ratio has been reported using the HCM 2000 methodology (as HCM 6th Edition does not report the overall v/c) for intersections operating at LOS C or worse, consistent with the City of San Bernardino Traffic Impact Study Guidelines.
Source: (Urban Crossroads, 2018f , Table 7-1)

To mitigate the Project's impacts to Intersections #4, #5 and #7, Mitigation Measure MM T-2 would require the Project Applicant to make a fair share fee payment to the intersection improvements specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis" (*Technical Appendix M*). As shown in Table 20, *Horizon Year (2040) Intersection Analysis (With Improvements)*, implementation of MM T-2 would provide the proper funds to install traffic signals at Intersections #4 and #5, thereby improving the LOS at Intersections #4, #5, and #7 to acceptable levels (LOS C and LOS D) and reducing the Project's significant cumulative traffic impact to less-than-significant. MM T-1, as previously described under the E+P analysis, would improve the LOS at Intersection #6 to an acceptable level (LOS D) and reduce the Project's impact to less than significant, as shown in Table 20.

Table 20 Horizon Year (2040) Intersection Analysis (With Improvements)

Intersection	Traffic Control[2]	Intersection Approach Lanes[1]												Delay[2] (secs.)		LOS	
		Northbound			Southbound			Eastbound			Westbound						
		L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
Int. #4 - Palm Av. & Institution Rd.																	
• 2040 Without Project																	
o W/out Improvements	AWS	0	1	1	1	1	0	0	0	0	1	0	1	13.1	**67.1**	B	F
o With Improvements	TS	0	1	1	1	1	0	0	0	0	1	0	1>	12.5	27.6	B	C
• 2040 With Project																	
o W/out Improvements	AWS	0	1	1	1	1	0	0	0	0	1	0	1	15.2	**98.5**	C	F
o With Improvements	TS	0	1	1	1	1	0	0	0	0	1	0	1>	12.9	31.3	B	C
Int. #5 - Palm Av. & Industrial Pkwy.																	
• 2040 Without Project																	
o W/out Improvements	AWS	1	1	1	1	1	1	0	1	0	1	1	1	25.2	**125.5**	D	F
o With Improvements	TS	1	1	1	1	1	1	0	1	0	1	1	1	17.5	34.5	B	C
• 2040 With Project																	
o W/out Improvements	AWS	1	1	1	1	1	1	0	1	0	1	1	1	33.4	**157.2**	D	F
o With Improvements	TS	1	1	1	1	1	1	0	1	0	1	1	1	17.6	39.6	B	D
Int #6: Palm Av. & I-215 SB Ramps																	
• 2040 Without Project																	

Table 20 Horizon Year (2040) Intersection Analysis (With Improvements)

Intersection	Traffic Control[2]	Intersection Approach Lanes[1]												Delay[2] (secs.)		LOS	
		Northbound			Southbound			Eastbound			Westbound						
		L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
○ Without Improvements	TS	1	2	1	1	2	0	0	1	d	0	1	0	**>200.0**	**114.9**	F	F
○ With Improvements	TS	1	2	1	**2**	2	0	0	1	d	0	1	0	51.6	52.7	D	D
• 2040 With Project																	
○ Without Improvements	TS	1	2	1	1	2	0	0	1	d	0	1	0	**>200.0**	**117.7**	F	F
○ With Improvements	TS	1	2	1	**2**	2	0	0	1	d	0	1	0	55.0	54.9	D	D
Int #7: Palm Av. & I-215 NB Ramps																	
• 2040 Without Project																	
○ Without Improvements	TS	0	2	0	0	2	0	0	0	0	0	1	1	39.0	**103.2**	D	F
○ With Improvements	TS	**1**	2	0	0	2	0	0	0	0	**1**	1	1	26.4	26.3	C	C
• 2040 With Project																	
○ Without Improvements	TS	0	2	0	0	2	0	0	0	0	0	1	1	40.6	**110.5**	D	F
○ With Improvements	TS	**1**	2	0	0	2	0	0	0	0	**1**	1	1	29.8	28.7	C	C

BOLD = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).
[1] When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes. L = Left; T = Through; R = Right; d = Defacto Right Turn Lane;1 = Improvement
[2] Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all-way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown. TS = Traffic Signal; AWS = All Way Stop
Source: (Urban Crossroads, 2018f, Table 7-3)

Conclusion

Based on the foregoing analysis, the Project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system during projected near- or long-term development conditions. With implementation of MMs T-1 and T-2, the Project would result in a less-than-significant impact to the local circulation system.

XVI-b) **Less-than-Significant Impact.** No San Bernardino County Congestion Management Program (CMP) arterial roadways are located within the Project study area; therefore, there is no potential for the Project to cause or contribute to adverse effects to CMP arterial roadways (Urban Crossroads, 2018f, p. 21).

The Project would contribute fewer than 50 two-way peak hour trips to I-215, which is part of the CMP roadway network and is the nearest freeway facility to the Project site (Urban Crossroads, 2018f, p. 4). Projects that contribute fewer than 50 two-way peak hour trips to a freeway do not exceed Caltrans' typical screening threshold for requiring an analysis of potential impacts to freeway mainline segments because when a project's peak hour trips are less than 50 they become unrecognizable from other traffic on the State highway system. Accordingly, the Project would not contribute substantial traffic to I-215 mainline segments. In addition, the Project would not cause or contribute to unacceptable queuing conditions at any I-215 ramp within the Project study area (Urban Crossroads, 2018f, pp. 60, 70, 81). Based on the foregoing information, the Project's impacts to freeway facilities located within the Project study area would be less than significant.

Beyond I-215, Project-related traffic would continue to travel throughout the Southern California region along the State highway system, dissipating as distance from the Project site increases. As such, Project-related traffic has the potential to travel along freeway mainline segments that experience unacceptable levels of service. All State highway system facilities

that operate at an unacceptable LOS are considered to be cumulatively impacted; however, because the Project would contribute fewer than 50 peak hour trips to these congested freeway segments, the Project's effect on San Bernardino County CMP freeway mainline facilities and other freeway mainline facilities located outside of San Bernardino County would be less than cumulatively considerable under all traffic scenarios.

Based on the foregoing analysis, the Project would not conflict with the applicable CMP and impacts would be less-than-significant.

XVI-c) **Less-than-Significant Impact.** The Project site is not located within an airport land use plan or within the vicinity of a public airport. In addition, the proposed Project would not include an air travel component (e.g., runways, helipads) and products transported to and from the Project site would not be transported via direct air travel. Accordingly, the Project would not substantially affect air traffic patterns, including an increase in traffic levels or a change in flight path location that results in substantial safety risks. A less-than-significant impact would occur.

XVI-d) **Less-than-Significant Impact.** County staff reviewed the Project's application materials and determined that no unsafe design features are proposed as part of the Project. All improvements planned as part of the Project would be in conformance with applicable County of San Bernardino standards and would not result in any hazards due to a design feature. Additionally, the proposed Project would be compatible with existing and planned land uses in the surrounding area and would not substantially increase safety hazards due to incompatible uses. Thus, impacts would be less than significant.

XVI-e) **Less-than-Significant Impact.** The Project would construct one warehouse building on the Project site, which would require the need for emergency access to-and-from the site. During the course of the County of San Bernardino's review of the proposed Project, the County confirmed that the Project would provide adequate access to-and-from the Project site for emergency vehicles. The County also confirmed the layout of the Project's proposed warehouse building, drive aisles, parking lots, and truck courts was sufficient to provide adequate on-site circulation for emergency vehicles. The Project's proposed driveways would connect directly to Cajon Boulevard, and the Project does not propose any changes to public roads other than frontage improvements along Cajon Boulevard that are designed to improve local traffic circulation. Furthermore, the County of San Bernardino will review all future Project construction drawings to ensure that adequate emergency access is maintained along abutting public streets during temporary construction activities. Impacts would be less than significant.

XVI-f) **Less-than-Significant Impact.** The proposed Project would contain a warehouse building, which is a land use that is not likely to attract large volumes of pedestrian, bicycle, or transit traffic. Regardless, the Project is designed to comply with all applicable County of San Bernardino transportation policies.

Neither the County of San Bernardino General Plan nor the Glen Helen Specific Plan identify bicycle routes or pedestrian trails within the vicinity of the Project site (SB County, 2007a; SB County, 2015). Accordingly, the Project has no potential to conflict with any County-

designated bikeways. According to the City of San Bernardino General Plan, within the vicinity of the Project, a bicycle route is planned along Cajon Boulevard, extending from Institution Road. There are no pedestrian trails within the vicinity of the Project site that have the potential to be affected. (City of San Bernardino, 2005, Figure PRT-2) The Project's driveways would be stop-sign controlled and sight distance at each Project driveway would be reviewed by the County of San Bernardino at the time future improvement plans are considered to ensure that sight distance meets applicable County standards and provides for safe bicycle and pedestrian circulation.

There are no bus transit facilities within the vicinity of the Project site. The nearest bus facility is located approximately 1.1 miles southeast of the Project site along Kendall Drive (Urban Crossroads, 2018f, Exhibit 3-6). Accordingly, the Project could not conflict with local public transit service.

As demonstrated by the foregoing analysis, the Project would not conflict with adopted policies, plans or programs related to alternative transportation, or otherwise substantially decrease the performance or safety of such facilities, and a less-than-significant impact would occur.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level considered less than significant:

MM T-1: Prior to the issuance of an occupancy permit for the Project, the Project Applicant/Developer shall make a fair share fee payment for the intersection improvements listed below. The fair share fees attributable to the Project shall be calculated according to the percentages specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis," prepared by Urban Crossroads (dated September 6, 2018). Specifically, the fair share fee payment required by this Mitigation Measure shall be used to make the following improvements:

a) Intersection #6 – Palm Avenue & I-215 SB Ramp: Re-stripe to provide a second southbound left turn lane.

MM T-2: Prior to the issuance of an occupancy permit for the Project, the Project Applicant/Developer shall make a fair share fee payment for the intersection improvements listed below. The fair share fees attributable to the Project shall be calculated according to the percentages specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis," prepared by Urban Crossroads (dated September 6, 2018). Specifically, the fair share fee payment required by this Mitigation Measure shall be used to make the following improvements:

a) Intersection #4 – Palm Avenue & Institution Road: Implement overlap phasing on the westbound right turn lane.

b) Intersection #5 – Palm Avenue & Industrial Parkway: Install a traffic signal.

c) Intersection #7 – Palm Avenue & I-215 NB Ramp: Install a second northbound left turn lane, install a westbound left turn lane, and re-stripe the existing shared left-through lane as a shared through-right turn lane.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. 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)?	☐	☐	☒	☐
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 Resource Code Section 5024.1, the lead agency will consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
SUBSTANTIATION:				

XVII-a) Less-than-Significant Impact.
XVII-b) Less-than-Significant Impact with Mitigation Incorporated.

L&L Environmental conducted a pedestrian field survey, an archival records search, a Sacred Lands File records search, and sent information requests to the Native American tribes with potential knowledge of the Project area (refer to *Technical Appendix D1* for additional details). Based on information provided to L&L Environmental, the Project site is located in relative proximity to two tribal villages and an area that may have been used as a travel/trade corridor. However, no prehistoric archaeological resources were observed on the surface of the Project site or have been previously recorded within the Project site's immediate vicinity (L&L Environmental, 2018b, pp. 23, 27).

The Project is subject to compliance with Assembly Bill 52 (AB 52). The primary purpose of AB 52 is to establish a consultation process between potentially affected Native American tribes and CEQA lead agencies that aims to identify tribal cultural resources that would potentially be impacted by a proposed project. During the AB 52 consultation process, the County of San Bernardino was notified by Native American tribes with traditional use areas that encompasses the Project site that buried tribal cultural resources had the potential to be uncovered on the Project site during construction. Accordingly, although not anticipated, implementation of the Project could cause a substantial adverse change in the significance of a tribal cultural resource. Mitigation would be required.

Implementation of MM TCR-1 through MM TCR-3 would ensure the proper identification and subsequent treatment of any tribal cultural resources that may be encountered during ground-disturbing construction activities associated with the proposed Project. With implementation of the required mitigation, the Project's potential impact to tribal cultural resources would be reduced to less-than-significant.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level considered less than significant:

MM TCR-1: Due to the heightened cultural sensitivity of the proposed Project area, a Tribal monitor representing the Gabrieleño Band of Mission Indians – Kizh Nation, Morongo Band of Mission Indians, and San Manuel Band of Mission Indians (Consulting Tribes) shall be present for all ground-disturbing activities that occurs within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. The Project developer/applicant shall provide compensation (hourly wages, per diem, mileage, lodging, etc.) for all Tribal monitors and the services these individuals provide as part of the monitoring effort for the Project.

MM TCR-2: Prior to the issuance of any ground disturbance-related permits (such as grading permits), the Lead Agency shall contact the Consulting Tribes to coordinate the development of a mutually-acceptable Monitoring, Discovery, Treatment, and Disposition Plan (MDTDP). The MDTDP will provide details regarding the process for monitoring and in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendent (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin. The MDTDP shall be approved and adopted by the Lead Agency prior to the issuance of any ground disturbance-related permits.

MM TCR-3: A pre-construction meeting shall be held with the contractors, archaeologists, and American tribal monitors/representatives(s) prior to the start of construction. This meeting shall outline all processes for monitoring on the project and information regarding how the Project Archaeologist and the Tribes will provide a weekly construction schedule identifying all ground disturbing activities within the monitoring area, and the specific cultural concerns associated with the Project area.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS				
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statues and regulations related to solid waste?	☐	☐	☒	☐
SUBSTANTIATION:				

XVIII-a) Less-than-Significant Impact. Wastewater treatment services would be provided to the Project site by the City of San Bernardino Municipal Water Department (SBMWD). The Project's effluent would be typical of a modern warehouse operation (bathroom, sinks, toilets, etc.). No industrial waste requiring special treatment or handling would occur. The SBMWD is required to operate their wastewater treatment facilities in compliance with the waste treatment and discharge standards/requirements established by the Santa Ana RWQCB. Therefore, the Project's contribution of wastewater to the SBMWD wastewater treatment facilities would not have any potential to exceed wastewater treatment requirements of the Santa Ana RWQCB. Additionally, the Project would not install or utilize septic systems or alternate wastewater treatment systems; therefore, the Project would have no potential to exceed the applicable wastewater treatment requirements established by the Santa Ana RWQCB. Accordingly, a less-than-significant impact would occur.

XVIII-b) Less-than-Significant Impact. Refer to the response to Threshold XVIII-e, below, for an analysis of the Project's potential effects to wastewater treatment facilities.

The Project would construct an on-site network of water and sewer pipes that would connect to existing water and sewer lines beneath Cajon Boulevard. The installation of water and sewer line connections as proposed by the Project would result in on-site physical impacts; however, these impacts are considered to be part of the Project's construction phase and are evaluated throughout this Initial Study accordingly. In instances where significant impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this Initial Study to reduce impacts to less-than-significant levels. The construction of water and sewer lines necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this Initial Study. Accordingly, additional mitigation measures beyond those identified throughout this Initial Study would not be required.

XVIII-c) **Less-than-Significant Impact.** The Project would involve the construction of storm water drainage facilities, including an underground infiltration basin, storm drain pipes, and catch basins. The construction of storm water drainage facilities proposed by the Project would result in physical impacts to the surface and subsurface of the Project site, as well as physical impacts within Cajon Boulevard. These impacts are considered to be part of the Project's construction phase and are evaluated throughout the Initial Study accordingly. In instances where potentially significant impacts may occur during the Project's construction phase, such potential impacts have been identified under the appropriate issue area in this Initial Study. The construction of storm drain infrastructure as necessary to serve the proposed Project would not result in any potentially-significant physical effects on the environment that are not already identified and disclosed as part of this Initial Study. The Project's impact would be less than significant.

XVIII-d) **Less-than-Significant Impact.** SBMWD is responsible for supplying potable water to the Project site and its region. As discussed in the 2015 San Bernardino Valley Regional Urban Water Management Plan, herein incorporated by reference as the "UWMP," which applies to and was adopted by the SBMWD, adequate water supplies are projected to be available to meet the SBMWD's estimated water demand through 2040 under normal, historic single-dry and historic multiple-dry year conditions (WSC, 2016, 10-18 - 10-19). SBMWD forecasts for projected water demand are based on the population projections of the Southern California Association of Governments (SCAG), which rely on the adopted land use designations contained within the general plans that cover the geographic area within SBMWD's service. Because the Project would be consistent with the County of San Bernardino General Plan land use designations for the site, the water demand associated with the Project was considered in the demand anticipated by the 2015 UWMP and analyzed therein. As stated above, the SBMWD expects to have adequate water supplies to meet all its demands until at least 2040; therefore, the SBMWD has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. The Project's impact would be less than significant.

XVIII-e) **Less-than-Significant Impact.** Wastewater generated by the Project would be treated by the SBMWD, which conveys wastewater to the San Bernardino Regional Wastewater Reclamation Plant (WRP) then to the Regional Tertiary Treatment Rapid Infiltration and Extraction (RIX) Facility for tertiary treatment. Based upon the City of San Bernardino Public

Works Department *Sewer System Management Plan (2014)*, the average wastewater generation flow for property designated for "heavy industrial" land use is 0.005 cubic feet per second (CFS) per acre (SBPWD, 2014, Table A). Accordingly, the proposed Project could generate approximately 37,000 gallons (0.037 million gallons) of wastewater per day (0.005 CFS per acre x 7.38 acres of building area = 0.05 CFS or 36,902 gpd). According to the City of San Bernardino Public Works Department and SARWQCB, the San Bernardino Regional WRP has an excess treatment capacity of approximately 5 million gallons per day (mgpd) and the RIX Facility has an excess treatment capacity of approximately 7 mgpd (SBPWD, n.d.; SARWQCB, 2016). Implementation of the Project would utilize approximately 0.7% of the San Bernardino Regional WRP daily excess treatment capacity and approximately 0.5% of the RIX Facility's daily excess treatment capacity. Accordingly, the SBMWD has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations). Because there is adequate capacity at existing treatment facilities to serve the Project's projected sewer demand, impacts would be less than significant.

XVIII-f) **Less-than-Significant Impact.** Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. The Project would be required to comply with mandatory waste reduction requirements as described below in Threshold XVIII-g. Solid waste generated by the Project would be disposed at the Mid-Valley Landfill and/or the San Timoteo Landfill. Existing capacities at each of these landfills is discussed below.

The Mid-Valley Landfill is permitted to accept a maximum of 7,500 tons of solid waste per day. In November 2017, the most recent time period for which disposal data was publicly available, the Mid-Valley Landfill was receiving an average of 3,500 tons of waste per day, which is approximately 46.7% of the facility's maximum permitted daily intake. The Mid-Valley Landfill has available capacity until at least the year 2033; however, future landfill expansion opportunities exist at this site. (CalRecycle, 2017a)

The San Timoteo Landfill is permitted to accept a maximum of 2,000 tons of solid waste per day. In January 2018, the most recent time period for which disposal data was publicly available, the San Timoteo Landfill was receiving an average of 977 tons of waste per day, which is approximately 48.9% of the facility's maximum permitted daily intake. The San Timoteo Landfill has available capacity until at least the year 2043; however, future landfill expansion opportunities may exist at this site. (CalRecycle, 2017b)

Construction Impact Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project (i.e., 321,496 s,f, building) and the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds per s.f. for non-residential uses, approximately 698 tons of waste is expected to be generated during the Project's construction phase ([321,496 s.f. x 4.34 pounds per s.f.] / 2,000 pounds per ton = ~698 tons) (EPA, 2009, p. 10). California Assembly Bill 939 (AB939) requires that a minimum of 50% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies);

therefore, the Project is estimated to generate approximately 349 tons during its construction phase. The Project's construction phase is estimated to last for approximately 265 days; therefore, the Project is estimated to generate approximately 1.32 tons of solid waste per day requiring landfill during construction.

Non-recyclable construction waste generated by the Project would be disposed at the Mid-Valley Landfill and/or the San Timoteo Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, Mid-Valley Landfill and the San Timoteo Landfill are not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The Mid-Valley Landfill and the San Timoteo Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.

Operational Impact Analysis

Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of industrial building area obtained from CalRecycle, long-term, on-going operation of the Project would generate approximately 2.28 tons of solid waste per day ([[1.42 pounds / 100 s.f.] x 321,496 s.f.]/ 2,000 pounds = 2.28 tons per day). Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate a maximum of 1.14 tons of solid waste per day requiring landfilling (2.28 tons per day x 50% = 1.14 tons per day). (CA Legislative Information, 2015)

Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the Mid-Valley Landfill and/or the San Timoteo Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

XVIII-g) Less-than-Significant Impact. The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the San Bernardino County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost effective waste management system that complies with the provisions of AB 939 and its diversion mandates. (CA Legislative Information, 2015)

In order to assist the County of San Bernardino in achieving the mandated goals of the Integrated Waste Management Act, the Project's building tenant(s) would be required to work with future refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. (CA Legislative Information, 2005) Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant(s) of the proposed Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (CA Legislative Information, 2011). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.

No significant adverse impacts are identified and no mitigation measures are required.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
Would the Project:				
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, 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?	☐	☒	☐	☐
SUBSTANTIATION:				

XIX-a) **Less-than-Significant with Mitigation Incorporated.** All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study. Throughout this Initial Study, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. Accordingly, with incorporation of the mitigation measures imposed throughout this Initial Study, the Project would not substantially degrade the quality of the environment and impacts would be less than significant.

XIX-b) **Less-than-Significant with Mitigation Incorporated.** As discussed throughout this Initial Study, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, but cumulatively considerable. In all instances where the Project has the potential to contribute to a cumulatively considerable impact to the environment, mitigation measures have been imposed to reduce potential effects to less-than-significant levels.

Aesthetics

New development on the Project site and in the surrounding area would change the existing character of the Project's viewshed; however, all development in the immediate vicinity of the

Project would be required to comply with the development regulations and design standards contained in the Glen Helen Specific Plan and the County's Development Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively considerable.

Agriculture and Forestry Resources

The Project would have no impact on agricultural and forestry resources. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Air Quality

Based on SCAQMD guidance, any direct exceedance of a regional or localized threshold also is considered to be a cumulatively considerable effect, while air pollutant emissions below applicable regional and/or localized thresholds are not considered cumulatively considerable. As discussed in the analysis in Threshold III-a through III-e, all Project-related construction and operation emissions would not exceed the applicable SCAQMD thresholds and, therefore, are not considered cumulatively considerable.

Biological Resources

The Project site does not support any riparian, or sensitive natural habitat, federally-protected wetlands, or serve as a wildlife corridor; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under these resources. There is, however, the potential that the burrowing owl and/or nesting birds could be present on the Project site prior to construction and there also is the potential that other development projects in the San Bernardino area could support the burrowing owl and/or bird nests. The Project's potential impact to the burrowing owl and nesting birds would be cumulatively considerable. MM BR-1 and MM BR-2 would reduce the Project's cumulative effects to less-than-significant levels by ensuring that no direct take of burrowing owls or nesting birds occurs during construction.

Cultural Resources

The Project site does contains one historic resource that has been adversely impacted by development throughout the San Bernardino County region and abuts another similarly affected historical resource: Historic Route 66 and an electrical transmission line corridor associated with the development of the Boulder Dam (later re-named Hoover Dam). In the absence of mitigation, the Project's direct and indirect effects to these resources would further exacerbate the deleterious effects to these resources that have occurred in the region. Implementation of MM CR-1 through MM CR-11 would ensure the Project's cumulative effects to important historical resources are less than significant. The Project does not contain known prehistoric archaeological resources or paleontological and mandatory compliance with State law would preclude impacts to human remains; therefore, there is no potential for the Project to contribute to a cumulatively considerably impact to these resources. Although development activities on the Project site would not impact any known paleontological, there is the remote potential that such resources are buried beneath the surface of the Project site and could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities. Therefore, the potential for development on the Project site to impact subsurface

paleontological is a cumulatively considerable impact. Application of MMs CR-12 and MM CR-13 would reduce the Project's cumulative impacts to less-than-significant levels.

Energy

The Project's construction and operation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and would not obstruct a state or local plan for renewable energy or energy efficiency. In addition all cumulative projects would also be required to comply with the California Building Standards Code (CALGreen), Therefore, there is no potential for the Project to contribute to a cumulatively considerably impact to these resources.

Geology and Soils

Potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides).

Greenhouse Gas Emissions

As described in the preceding analysis, global climate change (GCC) occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines § 15130[f]). Accordingly, the preceding analysis reflects a cumulative impact analysis of the GHG emissions related to the Project. As concluded under Thresholds VII-a and VII-b, the Project would not result in a cumulatively considerable impact related to GHG emissions.

Hazards and Hazardous Materials

Potential effects related to hazards and hazardous materials are inherently site-specific and the Project would not result in any substantial adverse impacts related to hazards or hazardous materials; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Hydrology and Water Quality

Construction and operation of the Project and other projects in the Santa Ana River watershed would have the potential to result in a cumulative water quality impact, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and WQMP) to minimize adverse effects to water quality, which would avoid a cumulatively considerable impact.

The Project and other projects in the Santa Ana River Basin would be required to comply with federal, State, and local regulations in order to preclude flood hazards both on- and off-site. Compliance with federal, State, and local regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and that proposed development would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively considerable effect related to flooding would not occur.

Land Use and Planning

The Project would not physically divide an established community, or conflict with applicable land use/planning documents; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact related to land use and planning.

Mineral Resources

Although the site is designated to contain mineral resources, due to the existing marketability constraints, land use compatibility, and physical constraints of the Project site, the Project would not result in a loss to known resource. In addition, no component of the Project would result in the loss of mineral resources elsewhere in the region. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Noise

Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no construction projects in the immediate vicinity of the Project site that would overlap with Project-related construction activities. Accordingly, cumulatively considerable impacts related to periodic noise and construction-related vibration would not occur. Under long-term operating conditions, and with implementation of MM N-1, the Project would comply with the County of San Bernardino noise ordinance and would not produce noticeable levels of vibration; therefore, cumulatively considerable impacts related to these issue areas would not occur. The analysis provided under Threshold XII-a demonstrates that the Project would not result in a cumulatively considerable impact related to transportation noise under long-term conditions.

Population and Housing

The Project would implement the land uses planned for the Project site by the Glen Helen Specific Plan, San Bernardino County General Plan, and zoning ordinance and would not require the construction of replacement housing. Accordingly, the County has anticipated – and planned for – the growth that would occur on the Project site and there is no potential for the Project to result in an adverse, cumulatively considerable environmental effect related to population and housing.

Public Services

All development projects in the County of San Bernardino, including the Project, would be required to pay development impact fees, a portion of which would be used by the County for the provision of public services, to offset the incremental increase in demand for fire protection

and police protection services. Furthermore, future development would generate an on-going stream of property tax revenue and sales tax revenue, which would provide funds that could be used by the County of San Bernardino for the provision of fire and police protection services. The Project would not directly result in the introduction of new residents to the County and, therefore, would have no potential to result in cumulatively considerable impacts to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services.

Recreation

The Project would have no impact to recreation facilities. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Transportation/Traffic

The Project's potential to result in cumulatively considerable effects to the circulation network were evaluated in the preceding analysis under Thresholds XVII-a and XVII-b – see the analysis under the Opening Year (2019) and Horizon Year (2040) traffic conditions. The Project would contribute cumulatively considerable traffic to projected LOS deficiencies at Intersections #5 and #6 under Opening Year (2019) traffic conditions and Intersections #4, #5, #6, and #7 under Horizon Year (2040) traffic conditions. As demonstrated in the analysis, the Project implementation of MMs T-1 and T-2 would reduce the Project's cumulatively considerable adverse effects to the circulation network to less-than-significant levels.

Tribal Cultural Resources

Development activities on the Project site would not impact any known tribal cultural resources. However, there is the remote potential that such resources are buried beneath the surface of the Project site and could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface tribal cultural resources during ground-disturbing activities. Therefore, the potential for development on the Project site to impact subsurface tribal cultural resource deposits is a cumulatively considerable impact. Application of MMs TCR-1 though TCR-3 would reduce the Project's cumulative impacts to less-than-significant levels.

Utilities and Service Systems

The Project would require water and wastewater infrastructure, as well as solid waste disposal for building operation. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively considerable impacts to utilities and service systems would not occur.

XIX-c) Less-than-Significant with Mitigation Incorporated. The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. In instances where the Project has potential to result in direct or indirect adverse effects to human beings (air quality and associated effects on human health from air pollutants, and construction-related noise and potential effects on hearing impairment), project design feature best practices and mitigation measures have been applied to ensure impacts to not rise above a level of significance. With required implementation of project design features and the mitigation measures identified in this Initial Study, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

SIGNIFICANCE: Possible significant adverse impacts have been identified or are anticipated and the mitigation measures have been identified throughout this Initial Study that shall be required as conditions of project approval to reduce these impacts to a level considered less than significant:

MITIGATION MEASURES:

Any mitigation measures, which are not self-monitoring shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval.

MM BR-1: Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the County of San Bernardino prior to the issuance of a grading permit and subject to the following provisions:

a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction.

b) In the event that the pre-construction survey identifies the presence of the burrowing owl on the Project site, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

MM BR-2: Vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (January 1 through September 1), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a) A migratory bird nesting survey of the Project site, including suitable habitat within a 500-foot radius, shall be conducted by a qualified biologist within three (3) days prior to initiating vegetation clearing or ground disturbance.

b) A copy of the migratory nesting bird survey results report shall be provided to the County of San Bernardino. If the survey identifies the presence of active nests, then the qualified biologist shall provide the County with a copy of maps showing the location of all nests and a species-appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the County and shall be no less than a 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist with County concurrence verify that the nests are no longer occupied and juvenile birds can survive independently from the nests.

MM BR-3: Prior to the initiation of construction activities, the perimeter of the Project's work area shall be fenced with highly visible fencing (e.g., orange construction fencing) to ensure impacts do not occur outside of the Project footprint.

MM BR-4: All off-road equipment shall be washed, particularly the wheels and under carriage, prior to transport to the Project site to prevent the spread of weedy plant species.

MM BR-5: Staging areas shall be placed in areas that have been previously disturbed and do not show an infestation of non-native plant species. Staging areas shall be maintained in a weed/noxious weed-free condition.

MM BR-6: All refuse created or brought on-site must be placed in covered containers, removed from the site at regular intervals, and properly disposed.

MM CR-1: The Project Applicant/Developer shall coordinate with the County of San Bernardino to prepare signage that will educate visitors to the Project site about the importance of Historic Route 66. The sign shall be installed within the front yard landscape setback, fronting Cajon Boulevard, accessible for public viewing. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for the sign installation prior to the Certificate of Occupancy issuance.

MM CR-2: The Project Applicant/Developer shall install Historic Route 66 pavers on the sidewalk on Cajon Boulevard along the Project site frontage. The paver intervals shall not exceed 100 feet in length to commemorate the roadway. The location of the pavers shall be shown on the Project's roadway improvement plans for Cajon Boulevard that are submitted to the County of San Bernardino for approval. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for paver installation prior to the Certificate of Occupancy issuance.

MM CR-3: The Project shall include landscaping along the Project site's frontage with Cajon Boulevard that complies with the applicable design standards/guidelines from the Glen Helen Specific Plan. The landscaping shall beautify the segment of Cajon Boulevard that abuts the Project site and create an enjoyable viewing experience for motorists. The County of San Bernardino shall verify the landscaping has been installed prior to the issuance of a Certificate of Occupancy.

MM CR-4: For the duration of construction activities, protective fencing and/or appropriate cautionary markers shall be placed around the base of the transmission line towers to protect the towers from inadvertent impacts. During construction, cranes or other construction equipment with the potential to reach the height of the transmission lines shall maintain the minimum separation from the transmission line towers required by Southern California Edison.

MM CR-5: The Project Applicant/Developer shall coordinate with the County of San Bernardino to prepare signage that will educate visitors to the Project site about the importance of the historic transmission line that traverses the Project site. The sign shall be installed within the front yard landscape setback, fronting Cajon Boulevard, accessible for public viewing. The Project Applicant/Developer shall obtain sign off from County of San Bernardino Planning for the sign installation prior to the Certificate of Occupancy issuance.

MM CR-6: Vehicle parking shall be prohibited within the transmission line easement that traverses the Project site until and unless the Project has completed Southern California Edison's consent review process and written approval is provided by Southern California Edison. If Southern California permits within the on-site transmission line easement, such parking shall be restricted to passenger vehicles. No truck or trailer parking, long-term parking of any vehicle, or vehicle storage shall be permitted within the easement and signage that describes the parking restrictions within the easement shall be placed in a conspicuous location.

MM CR-7: No trees shall be installed along Cajon Boulevard where the transmission line easement intersects with Cajon Boulevard to maintain visibility of the transmission line towers. Additionally, no aboveground improvements with the potential to detract from the visual character of the overhead transmission lines, including but not limited to light poles and trees, shall be placed in the easement without written approval from Southern California Edison.

MM CR-8: Prior to the issuance of a grading permit, the Project Applicant/Developer shall provide evidence to the County of San Bernardino that a qualified archaeologist (herein, "Project Archaeologist") with at least 3 years of regional experience in archaeology has been retained to conduct prehistoric and historic archaeological monitoring during earthmoving activities on-site and excavation activities within Cajon Boulevard. The Project Archaeologist shall be present on-site to monitor all ground-disturbing activities until the Project Archaeologist determines that the archaeological sensitivity of the Project's disturbance area has been reduced to low (i.e. older soil deposition, high alluvial activity and therefore highly disturbed deposit). Should the Project Archaeologist determine that there are no archaeological resources within the Project's disturbance area or should the archaeological sensitivity be reduced to low during construction activities, archaeological monitoring activities shall cease.

MM CR-9: Prior to the issuance of a grading permit, the Project Applicant/Developer or Project Archaeologist shall provide evidence to the County of San Bernardino that a Cultural Resources Monitoring Plan (CRMP) has been developed to guide the procedures and protocols of an archaeological monitoring program to be implemented during Project construction.

MM CR-10: Prior to the issuance of a Certificate of Occupancy, the Project Archaeologist shall submit a report to the County of San Bernardino and the South Central Coast Information Center that summarizes the results of the prehistoric and historic archaeological monitoring conducted during Project construction. The final report shall itemize any archaeological resources recovered, with maps to accurately record the original location of recovered resources, and provide evidence that the resources were donated to and accepted for curation by the San Bernardino County Museum or other accredited repository.

MM CR-11: If a significant archaeological resource is discovered on the Project site as defined by CEQA §21083.2, the Project Archaeologist shall temporarily halt all grading within a 100-foot radius of the discovered resource and make recommendations to the County of San Bernardino on the measures from the CRMP and measures from the Monitoring, Discovery, Treatment, and Disposition Plan (MDTDP) that shall be implemented to protect/recover the discovered resource(s). No further grading shall occur within a 100-foot radius of the discovery until the County of San Bernardino approves the protection/recovery measures and the measures have been implemented by the Project Archaeologist. Any archaeological artifacts recovered as a result of mitigation, excluding items covered by the provisions of applicable CRMP and MDTDP, shall be donated to the San Bernardino County Museum as directed by the County's General Plan policies.

MM CR-12: Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to the County of San Bernardino that the construction site supervisors and crew members involved with grading and trenching operations are trained to recognize paleontological resources (fossils) should such resources be unearthed during ground-disturbing construction activities. If a suspected paleontological resource is identified, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations in a 100-foot radius around the find and seek

identification and evaluation of the suspected resource by a qualified paleontologist meeting the definition of a qualified vertebrate paleontologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The significance of the discovered resources shall be determined by the qualified paleontologist. If the resource is determined to be significant, Mitigation Measure CR-4 shall apply.

MM CR-13: If a significant paleontological resource is discovered on the property, discovered fossils or samples of such fossils shall be collected and identified by a qualified vertebrate paleontologist. Significant specimens recovered shall be properly recorded, treated, and donated to the San Bernardino County Museum, Division of Geological Sciences, or other repository with permanent retrievable paleontologic storage. A final report shall be prepared and submitted to the County of San Bernardino that itemizes any fossils recovered, with maps to accurately record the original location of recovered resources, and contains evidence that the resources were donated to and accepted for curation by the San Bernardino County Museum or other repository.

MM GHG-1: Prior to issuance of building permits, the Project Applicant shall provide documentation to the County of San Bernardino Building Department demonstrating that the improvements and/or buildings subject to the building permit application include features identified in the County of San Bernardino Development Review Processes (March 2015) Greenhouse Gas Emissions Screening Tables, as needed to achieve the required 100 points.

MM N-1: Prior to issuance of a certificate of occupancy, the County of San Bernardino Building Division shall verify that a minimum 8-foot high noise barrier is constructed along the perimeter of the truck loading/loading dock area, as shown on Exhibit 9-A of the Project's Noise Study (*Technical Appendix L*). The noise barrier shall provide a weight of at least four (4) pounds per square foot of face area with no decorative cutouts or line-of-sight openings between shielded areas and the roadways. The barrier shall provide a minimum transmission loss of 20 dBA and must present a solid face from top to bottom. All gaps (except weep holes) shall be filled with grout or caulking. The noise barrier shall be constructed using the following materials: masonry block; earthen berm; or any combination of construction materials capable of the minimum weight of 4 pounds per square foot and a minimum transmission loss of 20 dBA.

MM T-1: Prior to the issuance of an occupancy permit for the Project, the Project Applicant/Developer shall make a fair share fee payment for the intersection improvements listed below. The fair share fees attributable to the Project shall be calculated according to the percentages specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis," prepared by Urban Crossroads (dated September 6, 2018). Specifically, the fair share fee payment required by this Mitigation Measure shall be used to make the following improvements:

a) Intersection #6 – Palm Avenue & I-215 SB Ramp: Re-stripe to provide a second southbound left turn lane.

MM T-2: Prior to the issuance of an occupancy permit for the Project, the Project Applicant/Developer shall make a fair share fee payment for the intersection improvements listed below. The fair share fees attributable to the Project shall be calculated according to the percentages specified in Table 1-3 of the "Cajon Boulevard Warehouse Traffic Impact Analysis," prepared by Urban Crossroads (dated September 6, 2018). Specifically, the fair share fee payment required by this Mitigation Measure shall be used to make the following improvements:

a) Intersection #4 – Palm Avenue & Institution Road: Implement overlap phasing on the westbound right turn lane.

b) Intersection #5 – Palm Avenue & Industrial Parkway: Install a traffic signal.

c) Intersection #7 – Palm Avenue & I-215 NB Ramp: Install a second northbound left turn lane, install a westbound left turn lane, and re-stripe the existing shared left-through lane as a shared through-right turn lane.

MM TCR-1: Due to the heightened cultural sensitivity of the proposed Project area, a Tribal monitor representing the Gabrieleño Band of Mission Indians – Kizh Nation, Morongo Band of Mission Indians, and San Manuel Band of Mission Indians (Consulting Tribes) shall be present for all ground-disturbing activities that occurs within the proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of Tribal monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage. The Project developer/applicant shall provide compensation (hourly wages, per diem, mileage, lodging, etc.) for all Tribal monitors and the services these individuals provide as part of the monitoring effort for the Project.

MM TCR-2: Prior to the issuance of any ground disturbance-related permits (such as grading permits), the Lead Agency shall contact the Consulting Tribes to coordinate the development of a mutually-acceptable Monitoring, Discovery, Treatment, and Disposition Plan (MDTDP). The MDTDP will provide details regarding the process for monitoring and in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. Inadvertent discoveries of human remains and/or funerary object(s) are subject to California State Health and Safety Code Section 7050.5, and the subsequent disposition of those discoveries shall be decided by the Most Likely Descendent (MLD), as determined by the Native American Heritage Commission (NAHC), should those findings be determined as Native American in origin. The MDTDP shall be approved and adopted by the Lead Agency prior to the issuance of any ground disturbance-related permits.

MM TCR-3: A pre-construction meeting shall be held with the contractors, archaeologists, and American tribal monitors/representatives(s) prior to the start of construction. This meeting shall outline all processes for monitoring on the project and information regarding how the Project Archaeologist and the Tribes will provide a weekly construction schedule identifying all ground disturbing activities within the monitoring area, and the specific cultural concerns associated with the Project area.

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