SAN BERNARDINO COUNTY
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
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(s):	0238-031-32, -33, -34, -35, -36	***USGS QUAD:***	Guasti
APPLICANT:	Prologis	***T, R, SECTION:***	T: 1S, R: 6W, S:21
LOCATION:	South of San Bernardino Ave., east of Commerce Dr., west of Calabash Ave.	***Community:***	Fontana
PROJECT NO.	PROJ-2019-00005	***Community Plan:***	N/A
REP('s):	T&B Planning, Inc.	***LUZD:***	Regional Industrial
PROPOSAL:	CUP to construct an approximately 165,324 square-foot warehouse building on approximately 10-acre site.	***OVERLAYS:***	Floodplain Safety, Biotic Overlay: Burrowing Owl

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: Anthony DeLuca, Senior Planner
Phone No.: (909) 387-3067
Email: Anthony.DeLuca@lus.sbcounty.gov

Project Sponsor: Prologis, LP
3546 Concours, Suite 100
Ontario, CA 91764

Consultant: T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

PROJECT DESCRIPTION:

The Kaiser Distribution Center #10 project (hereafter referred to as the "Project" and as described in further detail on following pages) consists of an application for a Conditional Use Permit (PROJ-2019-00005) to re-develop an approximately 10-acre site with a single-story 165,324 square-foot (s.f.) building located south of San Bernardino Avenue and approximately 1,000 feet east of Commerce Drive within the Sphere of Influence for City of Fontana, San Bernardino County. 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 Section 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.

CONDITIONAL USE PERMIT (PROJ-2019-00005)

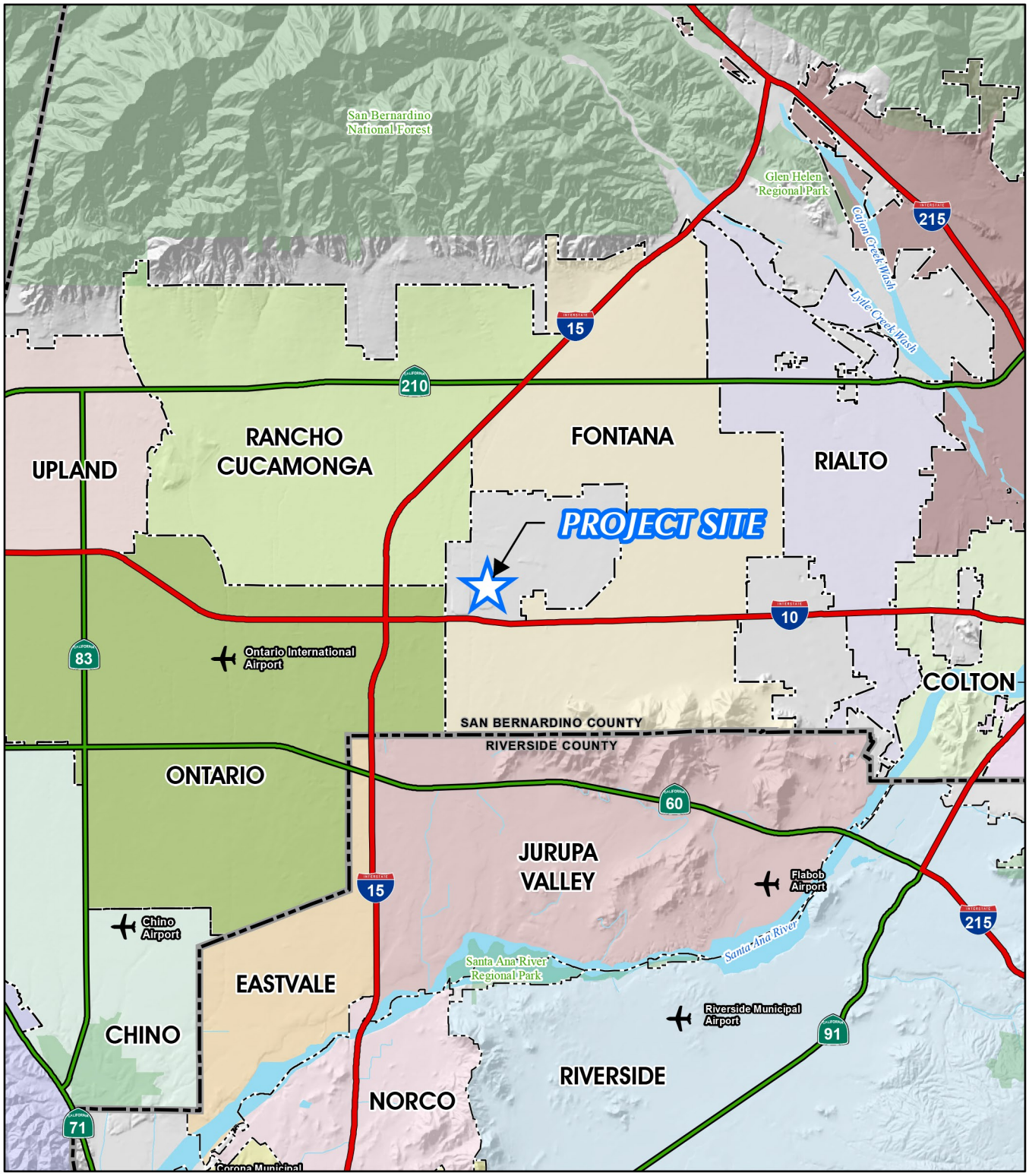
As shown on Figure 3, *Conceptual Site Plan*, the Project Applicant proposes to construct a 165,324 s.f. warehouse building on the approximate 10-acre Project site. The building would contain 156,324 s.f. warehouse floor area and 9,000 s.f. of supporting office/mezzanine floor area. Vehicular access to the Project site would be provided by two driveways; both driveways would accommodate passenger vehicles and trucks. The western driveway (at Prologis Drive) provides full access and would be shared with an existing warehouse distribution center that abuts the Project site on the west. Signage and striping are proposed where truck aisles from the existing off-site and proposed on-site warehouses merge to ensure adequate and safe truck movements and stacking. The eastern driveway would be restricted to right-in/right-out movements.

Parking and Loading

The Project would provide approximately (±) 116 passenger vehicle parking spaces distributed on the west and east sides of the building. An enclosed truck court – used for the loading and unloading of goods and short-term truck parking – with 36 loading docks (also called "bays") and ±59 truck trailer parking stalls would be located on the south and east sides of the building. Two bicycle rack installments, one in front of each potential office location, also would be provided. Because the Project Applicant is pursuing the Project on a speculative basis, meaning the future occupant(s) of the building is not known at the time of writing this Initial Study/MND, the number of automobile and trailer parking spaces are identified as approximate (±) to acknowledge the possibility of parking lot striping revisions in the future to accommodate the needs of future building occupants. The Project complies with the minimum automobile and bicycle parking requirements of the County of San Bernardino Development Code.

Architecture, Walls, and Fences

Figure 4, *Conceptual Architectural Elevations*, depicts the conceptual architectural design for the proposed warehouse building. The proposed warehouse building would be constructed to a maximum height of approximately 50 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 green-glazed glass. Articulated building elements include a varied roofline, vertical wall reveals, horizontal wall recesses, and parapets. The exterior



Source(s): ESRI, RCTLMA (2019), SBCTA (2019)

Figure 1

0 0.75 1.5 3 Miles

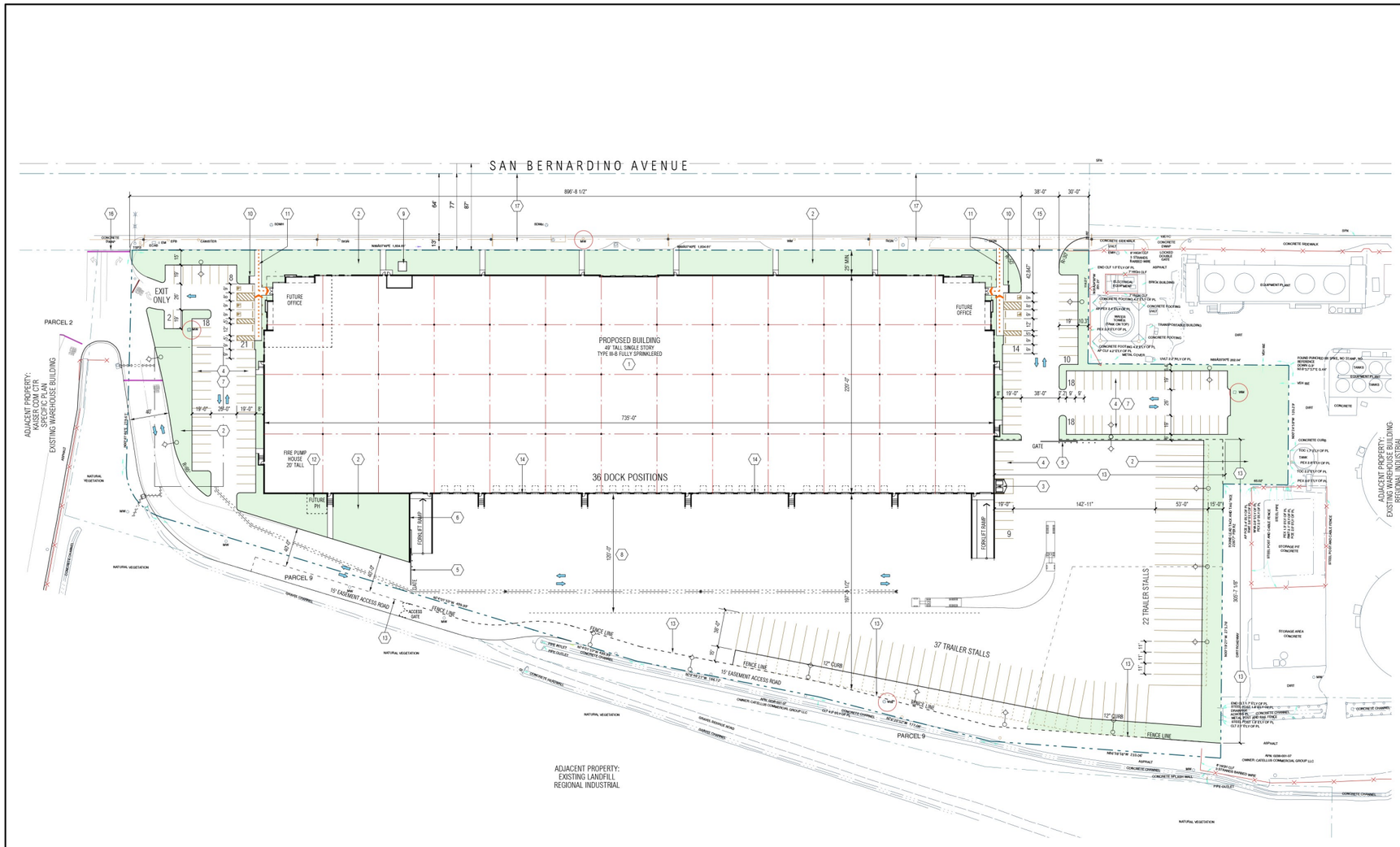
Regional Map

Source(s): ESRI, RCTLMA (2019), SB County (2019), SBCTA (2019)

Figure 2

0 425 850 1,700 Feet

Vicinity Map



KEYNOTES

1. PROPOSED PAINTED CONCRETE TILT-UP WAREHOUSE / OFFICE / MANUFACTURING FACILITY. TENANT IS NOT CURRENTLY IDENTIFIED.
2. SHADED AREA: PROPOSED IRRIGATED LANDSCAPING PER SPECIFIC PLAN GUIDELINES WITH MIN 6" CONCRETE CURBS AT ALL PERIMETERS ABUTTING PAVED AREAS.
3. CONCRETE TRASH ENCLOSURE MIN. 6'-0" HIGH SOLID ENCLOSURE PAINTED TO MATCH THE BUILDING. TRASH ENCLOSURE DIMENSIONS ARE 9.5' WIDE X 15'-0" LONG STORING (2) 4 CU. YD. BINS
4. TYPICAL STANDARD PARKING STALL MIN. 9' X 19' (OR 17' + 2' OVERHANG) - STRIPE PER COUNTY STANDARDS.
5. ROLLING OR SWINGING 8'-0" HIGH PAINTED STEEL PICKET GATE. PROVIDE KNOX BOCK AT ALL GATES FOR FIRE DEPARTMENT ACCESS. PROVIDE KNOX BOCK AT ALL GATES FOR FIRE DEPARTMENT ACCESS.
6. 10' HIGH PAINTED CONCRETE TILT-UP SCREEN WALL.
7. CONCRETE PAVED DRIVE AISLE. 26'-0" MINIMUM WIDTH.
8. CONCRETE TRUCK COURT AND LOADING ZONE.
9. TRANSFORMER. SCREEN WITH LANDSCAPING.
10. BIKE RACKS AT EACH OFFICE ENTRY SHALL BE PROVIDED.
11. ACCESSIBLE PATH OF TRAVEL FROM STALLS & PUBLIC WAY TO PRIMARY ENTRANCE. SLOPE NOT TO EXCEED 1:20 EXCEPT AT CURB RAMPS AND OTHER DEFINED RAMPS. CROSS SLOPE NOT TO EXCEED 1/4" PER FOOT.
12. FUTURE PAINTED CONCRETE TILT-UP FIRE PUMP HOUSE LOCATION IF REQUIRED.
13. 8'-0" HIGH CHAIN LINK FENCE ALONG INTERIOR PROPERTY LINES BEHIND SCREEN WALLS.
14. LOADING DOCK DOOR AT BUILDING.
15. NEW CURB CUT PER COUNTY STANDARDS.
16. EXISTING CURB CUT TO REMAIN PER COUNTY STANDARDS.
17. EXISTING STREET CURB AND SIDEWALK.

GENERAL NOTES

1. THE PROPOSED PROJECT SHALL COMPLY WITH THE PROVISIONS OF THE COUNTY OF SAN BERNARDINO PLANNING.
2. A. LANDSCAPING PLAN SHALL BE SUBMITTED TO THE PLANNING DEPARTMENT FOR APPROVAL PRIOR TO ISSUANCE OF BUILDING PERMITS AND SHALL BE IMPLEMENTED PRIOR TO OCCUPANCY.
3. THE PROJECT DOES NOT PROPOSE ANY TENANT SIGNAGE AT THIS TIME. SIGNAGE MAY BE SUBMITTED AT A LATER DATE.
4. THERE ARE NO PROTECTED OR ENDANGERED PLANTS ON SITE.
5. NO HILLY TERRAIN OR DRAINAGE PROBLEMS EXIST.
6. ALL SITE GATES WILL BE PROVIDED WITH A KNOX BOX PER COUNTY FIRE DEPARTMENT STANDARDS.

UTILITIES & SERVICES

WATER:
FONTANA WATER COMPANY
C/O SAN GABRIEL WATER COMPANY
1142 GARVEY AVENUE
EL MONTE, CA 91734-2010
(818)-448-5930

SEWAGE:
IEUA - INLAND EMPIRE UTILITIES AGENCY
6075 KIMBALL AVENUE
CHINO, CA 91708
(909)-993-1600

SOLID WASTE:
COUNTY OF SAN BERNARDINO
SOILD WASTE MANAGEMENT DIVISION
222 W. HOSPITALITY LANE 2ND FLOOR
SAN BERNARDINO, CA. 92415-0017
(909) 386-870

ELECTRICITY:
SOUTHERN CALIFORNIA EDISON
7951 REDWOOD AVENUE
FONTANA, CA 92335
(909) 357-5581

GAS:
THE GAS COMPANY
1981 WEST LUGONIA
REDLANDS, CA 92374
(909) 335-7744

TELEPHONE:
VERIZON
3939 EAST CORONADO
ANAHEIM, CA 92807
(714) 666-5534

CABLE TELEVISION:
COMCAST CABLEVISION
1205 DUPONT AVENUE
ONTARIO, CA 91761
(909)-988-2999

FIRE PROTECTION:
SAN BERNARDINO COUNTY
CENTRAL VALLEY FIRE PROTECTION DISTRICT
620 SOUTH E STREET
SAN BERNARDINO, CA 92415
(909) 386-8465

SCHOOL DISTRICT:
CHAFFEY JOINT UNION HIGH SCHOOL
211 WEST FIFTH STREET
ONTARIO, CA 91762
(909) 988-8511

ASSESSOR'S PARCEL NUMBERS

0238-031-32, 0238-031-33, 0238-031-34, 0238-031-35 AND 0238-031-36

LEGAL DESCRIPTION

PARCEL 4 TO 8, INCLUSIVE OF PARCEL MAP NO 15540, IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 207, PAGES 26 TO 30, INCLUSIVE, OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APPLICATION TYPE

LAND USE PLANNING AREA: WESTERN
PERMITTED LAND USE: TRANSPORTATION RELATED COMMERCIAL AND INDUSTRIAL BUSINESS.
PROPOSED LAND USE: WAREHOUSE, OFFICE (SUPPORT FOR INDUSTRIAL), AND MANUFACTURING AS PERMITTED

LAND OWNER

PAC OPERATING LIMITED PARTNERSHIP, A DELAWARE LIMITED PARTNERSHIP,
3546 CONCOURS STREET, SUITE 100
ONTARIO, CA 91764
(909) 673-8723

APPLICANT

PROLOGIS
3546 CONCOURS STREET, SUITE 100
ONTARIO, CA 91764
RACHEL HICKENBOTTOM (909) 673-8723

PLAN PREPARERS

RGA, OFFICE OF ARCHITECTURAL DESIGN
15231 ALTON PARKWAY, SUITE 100
IRVINE, CA 92618
CONTACT: MIKE GILL 949-341-0920

HUITT-ZOLLARS, INC.
2603 MAIN STREET, SUITE 400
IRVINE, CA 92614
CONTACT: DAVID WHITE 949-988-5818

PARKING SPACE ANALYSIS

LAND USE	PARKING RATIO	AREA	REQUIRED	PROVIDED
OFFICE	1/200 SF	9,000 SF	45 STALLS	46 STALLS
WAREHOUSE	1/1000 SF	40,000 SF	40 STALLS	40 STALLS
WAREHOUSE	1/4000 SF	116,324 SF	30 STALLS	30 STALLS
TOTALS		165,324 SF	115 STALLS	116 STALLS

ACCESSIBLE STALLS	3 STALLS
VAN ACCESSIBLE STALLS	2 STALLS
TRUCK DOCK POSITIONS	36 PROVIDED
TRAILER PARKING STALLS	59 PROVIDED

PROJECT DATA

SITE AREA	441,406 SF 10.13 AC
BUILDING AREA	
FOOTPRINT	160,824 SF
MEZZANINE	4,500 SF
TOTAL	165,324 SF
LOT COVERAGE	37.45 %
LANDSCAPE PROVIDED (15% REQUIRED)	66,235 SF (15%)
PAVED SURFACE AREA	214,347 SF (48.56)
PARKING REQUIRED:	
9,000 OFFICE (1/200 SF)	45 STALLS
WAREHOUSE: (1 - 40,000 SF 1/1000 SF)	40 STALLS
40,000 SF AND UP: 1/4000 SF)	30 STALLS
TOTAL REQUIRED	115 STALLS
PARKING PROVIDED:	
STANDARD STALLS	111 STALLS
ACCESSIBLE STALLS	5 STALLS
TOTAL	116 STALLS
TRUCK DOCK POSITIONS	36 PROVIDED
TRAILER PARKING STALLS	59 PROVIDED

PROJECT DESCRIPTION

THE PROJECT CONSISTS OF A 165,324 S.F. BUILDING ON 10.13 ACRES. TWO OFFICE AREAS TOTALING 9,000 S.F. ARE PROVIDED. THE BUILDING WILL HAVE 36 TRUCK DOCK DOORS ON THE SOUTH. ACCESS FOR THIS BUILDING WILL BE FROM TWO DRIVEWAYS FROM SAN BERNARDINO AVE. ALONG THE NORTH THUS PROVIDING CIRCULATION FOR EMERGENCY VEHICLES AROUND THE ENTIRE BUILDING. AUTO PARKING WILL BE PROVIDED ALONG THE EAST AND WEST, AS WELL AS IN THE TRUCK YARD ON THE SOUTH. THE PRIMARY OCCUPANCY CLASSIFICATION FOR THIS USE WILL BE "S" OCCUPANCY.

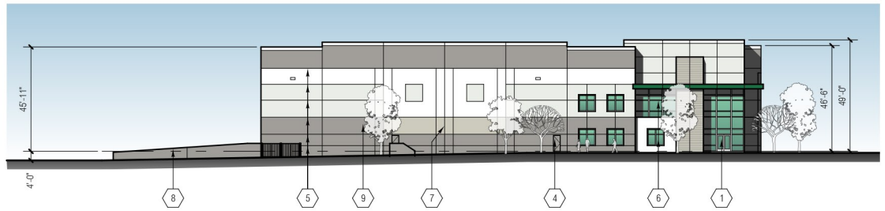
Source(s): RGA (02-14-2020)

Figure 3

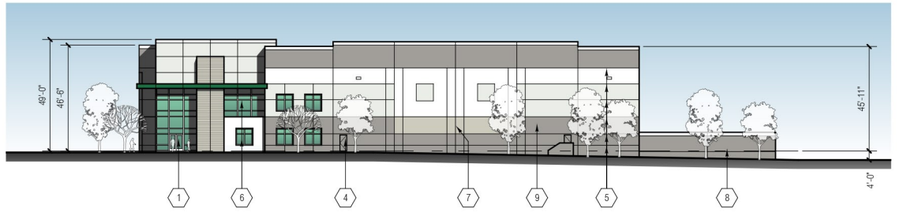
Not to Scale

Conceptual Site Plan

EAST ELEVATION



WEST ELEVATION

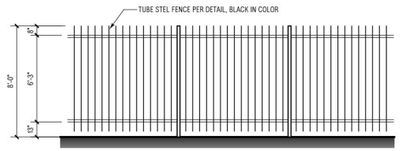


KEYNOTES (000)

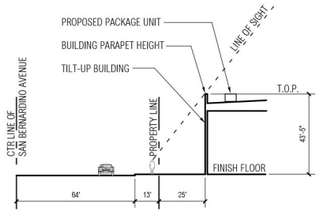
1. PRIMARY ENTRANCE.
2. PAINTED 12' WIDE X 15' HIGH LEVEL VERTICAL LIFT TRUCK DOOR.
3. PAINTED 9' WIDE X 10' HIGH VERTICAL LIFT TRUCK DOOR.
4. 3' X 7' PAINTED METAL MAN DOOR.
5. 2" WIDE X 3/4" DEEP HORIZONTAL / VERTICAL REVEAL.
6. REFLECTIVE GLASS IN STOREFRONT FRAME SYSTEM.
7. PANEL JOINT.
8. 6'-0" HIGH CONCRETE PAINTED TRASH ENCLOSURE WITH SOLID METAL PAINTED SWINGING DOORS.
9. PAINTED CONCRETE TILT-UP EXTERIOR WALL CONSTRUCTION.
10. PAINTED CONCRETE SCREENWALL WITH BLACK TUBE STEEL GATE AT TRUCK COURT ENTRY
11. PAINTED CONCRETE TILT-UP FIRE PUMP HOUSE.

FINISH SCHEDULE

1. FIELD COLOR - PLD-9 PURE WHITE
2. ACCENT COLOR - PLD-6 SABLE
3. ACCENT COLOR - PLD-10 FIRST STAR
4. BASE ACCENT COLOR - PLD-7 LIQUORICE TINT
5. ACCENT COLOR - PLD-5 NEW DARK GREEN
6. GREEN REFELECTIVE GLAZING



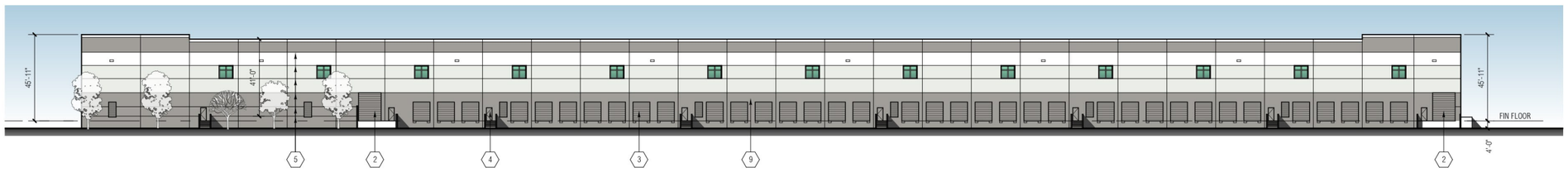
TYPICAL TUBE STEEL FENCE ELEVATION
SCALE: 1/4" = 1'-0"



TYPICAL EQUIPMENT SCREEN LINE OF SIGHT
SCALE: 1" = 50'-0"
NOTE: LINE OF SIGHT TAKEN FROM 6'-0" ABOVE FINISH GRADE

NORTH ELEVATION

SOUTH ELEVATION



SIMILAR SITE LIGHTING STYLE (1)
SCALE: N.T.S.

Source(s): RGA (07-08-2019)

Figure 4

Not to Scale

Conceptual Architectural Elevations

color palette for the proposed building is comprised of various neutral colors, including shades of white, gray, and beige; green accents would be used at office areas. Eight-foot-high tube steel fencing would be constructed between the passenger vehicle parking spaces and the truck court on the east side of the building. Additionally, eight-foot-high chain link fencing is proposed along the southern and eastern property lines behind screen walls (not visible from public view). Lastly, a 10-foot-tall concrete return wall is proposed at the western entrance to the truck court to screen views of the truck court from San Bernardino Avenue.

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 are expected to be concentrated along the Project site's frontage with San Bernardino Avenue, at building entries, and within the automobile parking areas. The Project's planting and irrigation plans are required to comply with Chapter 83.10 of the County of San Bernardino Municipal Code, which establishes requirements for landscape design, irrigation system design, and water-use efficiency.

LOT MERGER

The Project site is comprised of APNs 0238-031-32, -33, -34, -35, -36. Implementation of the Project would require a Lot Merger to combine these five (5) parcels to create one (1) parcel.

PROJECT TECHNICAL CHARACTERISTICS

PROJECT IMPROVEMENTS

Public Roadway Improvements

San Bernardino Avenue, located directly north of the Project site, provides access to/from the Project site. Under existing conditions, San Bernardino Avenue is developed to its full width along the Project site frontage with two vehicular travel lanes in each direction, painted/striped shoulders, a raised median, and sidewalks (on the south side of the street only). The Project would not alter the segment of San Bernardino Avenue that abuts the Project site with the exception of the construction of a new driveway and driveway approach at the northeast corner of the Project site and the replacement of curb and gutter that would be demolished to accommodate construction of the aforementioned driveway.

Water Infrastructure

Water service would be provided to the Project site by the Fontana Water Company (FWC). To service the proposed building, the Applicant would construct a new 12-inch diameter water main beneath San Bernardino Avenue – on the south side of the street – along the Project site frontage. The proposed water main would extend east beyond the Project site boundary and would connect to an existing water main at Calabash Avenue.

Wastewater Infrastructure

Wastewater conveyance services are provided to the Project area by an existing 8-inch sewer line located beneath San Bernardino Avenue and the northeast portion of the Project site. The Project Applicant would

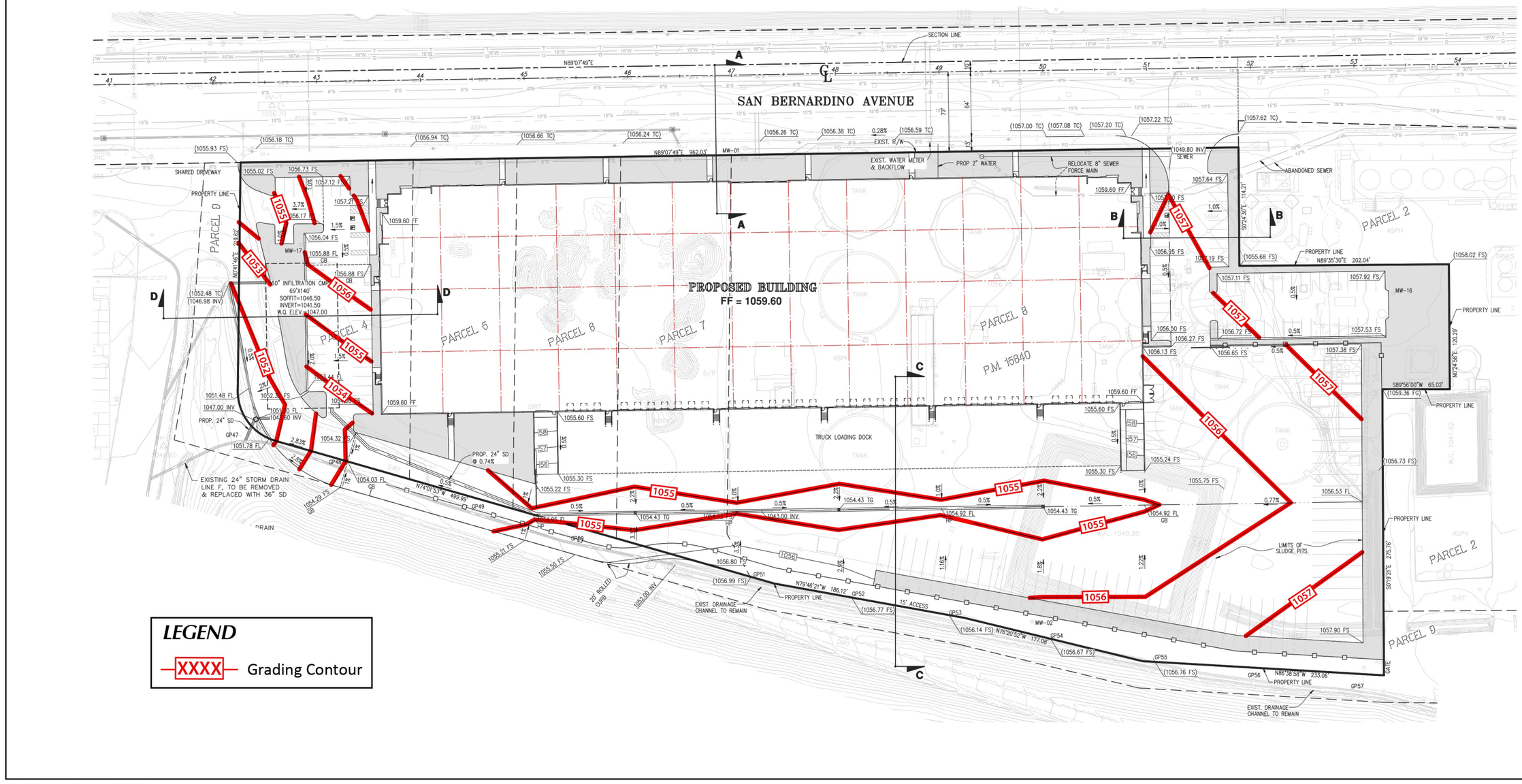
construct one connection to this existing sewer line to provide service to the proposed building and would relocate the portion of the line on the northeast portion of the site so that its alignment does not conflict with the proposed building footprint.

Drainage Plan

The proposed on-site storm drain system would consist of a network of catch basins (fitted with filters that separate and trap trash, debris, sediment, and hydrocarbons from stormwater runoff), underground storm drain pipes, and an underground infiltration chamber (to be located beneath the parking lot on the west side of the building). The on-site storm drain system is designed to collect, treat, and temporarily store stormwater runoff (as needed) before discharging treated flows from the property (or allowing treated flows to percolate into the ground). First flush stormwater runoff flows (i.e., typically the first ¾-inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be conveyed via the catch basins and underground storm drains to the proposed infiltration chambers. Stormwater runoff captured after the first flush would be discharged off-site via a proposed connection to an existing private storm drain pipe at the southwest corner of the Project site (and the Project would replace a segment of the private storm drain pipe, currently sized at a 24-inch-diameter, with a 36-inch-diameter segment of pipe). The off-site private storm drain pipe would convey stormwater runoff from the Project site to the San Sevaine Channel via an existing connection.

Earthwork and Grading

Proposed grading activities would occur over the entire Project site. To implement the Project's grading concept, approximately 37,661 cubic yards of cut and 62,738 cubic yards of fill would be required; resulting in the need to import approximately 25,077 cubic yards of soil to the Project site. When grading is complete, the finished floor elevation of the building would be approximately 1,060 feet above mean sea level (amsl) and the Project site would have a slight downward slope from north to southwest; the highest point of the site would be its northeast corner (at approximately 1,057 amsl) and the low point of the site would be its southwest corner (at approximately 1,052 amsl). The *Conceptual Grading Plan* is illustrated on Figure 5.



Source(s): Huitt-Zollars (12-18-2019)

Figure 5

Not to Scale

Conceptual Grading Plan

CONSTRUCTION CHARACTERISTICS

Based on information provided by the Project Applicant, the Project is expected to be constructed over a period of approximately seven months. Demolition and site preparation would occur first, followed by mass-grading and installation of underground infrastructure and retaining walls. Next, fine grading would occur, surface materials would be poured, and the proposed building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed. Construction activities would generally follow the schedule below.

Table I Estimated Construction Schedule

Phase Name	Start Date	End Date	Working Days
Demolition	05/04/2020	07/24/2020	60
Site Preparation	07/25/2020	08/07/2020	10
Grading	08/08/2020	09/18/2020	30
Building Construction	09/19/2020	12/25/2020	70
Paving	11/28/2020	12/25/2020	20
Architectural Coating	11/28/2020	12/25/2020	20

Source: (Urban Crossroads, 2020a, Table 3-2)

Construction workers would travel to the site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction equipment is expected to operate on the Project site up to eight hours per day, six days per week. Even though the County of San Bernardino Development Code permits construction to occur up to 12 hours per day (between the hours of 7:00am to 7:00pm), construction equipment is not in continuous use and some pieces of equipment are used only periodically throughout a typical day of construction. Thus, eight hours of daily use per piece of equipment is a reasonable assumption. Should construction activities need to occur at night (such as concrete pouring activities which benefit from air temperatures that are lower than what occurs during daytime), the Project Applicant would be required to obtain authorization for nighttime work from the County of San Bernardino.

The types and numbers of heavy equipment expected to be used during construction activities are listed in Table II, *Construction Equipment List*. For purposes of evaluation in this Initial Study, Project construction is assumed to be complete in the year 2020.

OPERATIONAL CHARACTERISTICS

The Project Applicant expects that the building would be used primarily for the storage and distribution of dry goods, with the potential for up to 20% of the building's floor area to be used for cold storage/refrigerated uses. At the time this Initial Study/MND was prepared, the future occupant(s) of the Project were unknown. The Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Exterior lighting would be subject to compliance with the County of San Bernardino Development Code, which requires exterior lighting to be energy-efficient, shielded, or recessed,

Table II Construction Equipment List

Activity	Equipment	Number	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Tractors/Loaders/Backhoes	2	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2020a, Table 3-3)

and directed downward and away from adjoining properties (Section 83.07.030). The Project's building design would be required to meet all applicable provisions of the California Green Building Standards Code (CalGreen) that are in effect at the time of the building's construction. Furthermore, the proposed warehouse building would be designed and constructed in accordance with the Project Applicant's Leadership in Energy and Environmental Design (LEED) Volume Program, which ensures the Project would incorporate contemporary energy-efficient/energy-conserving designs and operational programs.

The building is designed such that business operations would be conducted within the enclosed building, with the exception of vehicle movement, parking, and the loading and unloading of tractor trailers at designated loading bays. The Project's building is designed to have 36 loading bays on the south side of the building. As a practical matter, dock doors on warehouse buildings are not occupied by a truck at all times of the day. There are typically many more dock positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock positions are frequently inactive throughout the day. The outdoor cargo handling equipment used during loading, and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) could be diesel or non-diesel powered.

According to the Project's traffic impact analysis report, the Project is calculated to generate 230 passenger vehicle trips and 58 truck trips per day during Project operations. Pursuant to State law, on-road diesel-

fueled trucks that access the Project site are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

As previously mentioned, the future occupant(s) of the Project are not known at this time; therefore, the number of jobs that would be generated during Project operation cannot be precisely determined. Research conducted by CBRE on building and employment trends in the logistics industry found an average of approximately 1,000 s.f. of building area per employee (CBRE, 2018). Using the average of approximately 1,000 s.f. of building area per employee, the Project would create an estimated 166 jobs (165,324 s.f. × [1 employee ÷ 1,000 s.f.] = 165.3 employees).

Operation of the proposed Project is estimated to use approximately 22,000 gallons of water per day. (Fontana Water Company's standard planning demand rate for industrial warehouse/distribution land uses is 2,200 gallons of water per acre per day.) For purposes of analysis in this MND, the proposed warehouse facility is also estimated to generate 22,000 gallons of wastewater (sewer flow) per day. (The estimate for wastewater flows mirrors the Project water demand and is conservative because Project water use includes landscape irrigation, which does not flow into the sewer system or require wastewater treatment.)

According to the Project's energy analysis, the Project is calculated to use approximately 338,616 kilowatt hours (kWh) of electricity per year and approximately 236,413 kilo-British thermal units (kBTU/yr) of natural gas per year (Urban Crossroads, 2020c, Table 4-15). The Project would be required by law to comply with enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, the California Green Building Code).

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

Pursuant to CEQA Guidelines Section 15125(a)(1), the physical environmental conditions that existed at the time the Lead Agency commenced the environmental analysis for the Project should generally be used as the baseline conditions for the environmental analysis in an Initial Study/MND. The Project's application was filed with the County of San Bernardino in July 2019 and the environmental review commenced at that time. As such, the environmental baseline for the Project is established as July 2019 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

The County of San Bernardino General Plan Land Use Zoning District Map designates the Project site as "Regional Industrial" (IR) (San Bernardino County, 2009). Figure 6, *County of San Bernardino General Plan Land Use Zoning District Map*, is presented on the following page. The IR land use zoning district serves the following purposes:

- To identify and establish areas suitable for major industrial centers or a single large industrial plant having 200,000 or more square feet of floor area, or more than 500 employees on any shift.
- To provide sites for industrial uses which have severe potential for negative impacts on any uses that would be located relatively close to them.
- To identify areas intended eventually to be utilized for industrial purposes to support the public need for manufacturing uses and employment opportunities.

The IR zones are identified as areas located within urban areas where full urban services are available; areas of existing industrial uses; areas that are or can be buffered from adjacent uses in other land use categories; areas adjacent to major transportation terminals and energy facilities; areas where industrial traffic is not routed through residential or other areas not compatible with industrial traffic; areas that have direct access to a major arterial, major divided streets, or freeways, or are served by railroad access; areas appropriate for development of large acreages using the concepts of planned development to provide industrial parks with unified landscaping, signing, building design, services, infrastructure, and circulation; areas located peripheral to urban areas where residential or long-term agricultural uses are inappropriate; areas that have stable soil with average slope of 10 percent or less; and, rural areas where there is a demonstrated need for industrial land uses (San Bernardino County, 2007, pp. II-19 to II-20)

Land Use

The eastern portion of the Project site was developed in 1942 and operated as a wastewater treatment plant for the Kaiser Steel Mill (now operated by California Steel Industries), which abuts the Project site to the north. The wastewater treatment plant was shut down in 2016. Under existing conditions, 28 structures (e.g., buildings, storage tanks) associated with the former wastewater treatment plan are present on the Project site.

The western portion of the Project site was operated by Chemwest Industries as a ferrous chloride manufacturing facility from prior to 1971 to approximately 1985. The facility was closed and remediated and today stands as an empty lot covered in gravel. The Project site's existing uses are presented in Figure 7, *Aerial Photograph*.

Surrounding Land Uses and Development

Figure 8, *Surrounding Land Uses and Development,* depicts the existing land uses immediately surrounding the Project site. As shown on Figure 8, the Project site is located in a heavy industrial area. Land uses immediately north of the Project site are industrial, with the Kaiser Steel Mill (California Steel Mill) facility across San Bernardino Avenue. To the west and east of the Project site are industrial uses, with existing warehouses predominantly surrounding the Project site. To the south is a landfill for a former slag pit associated with the Kaiser Steel Mill.

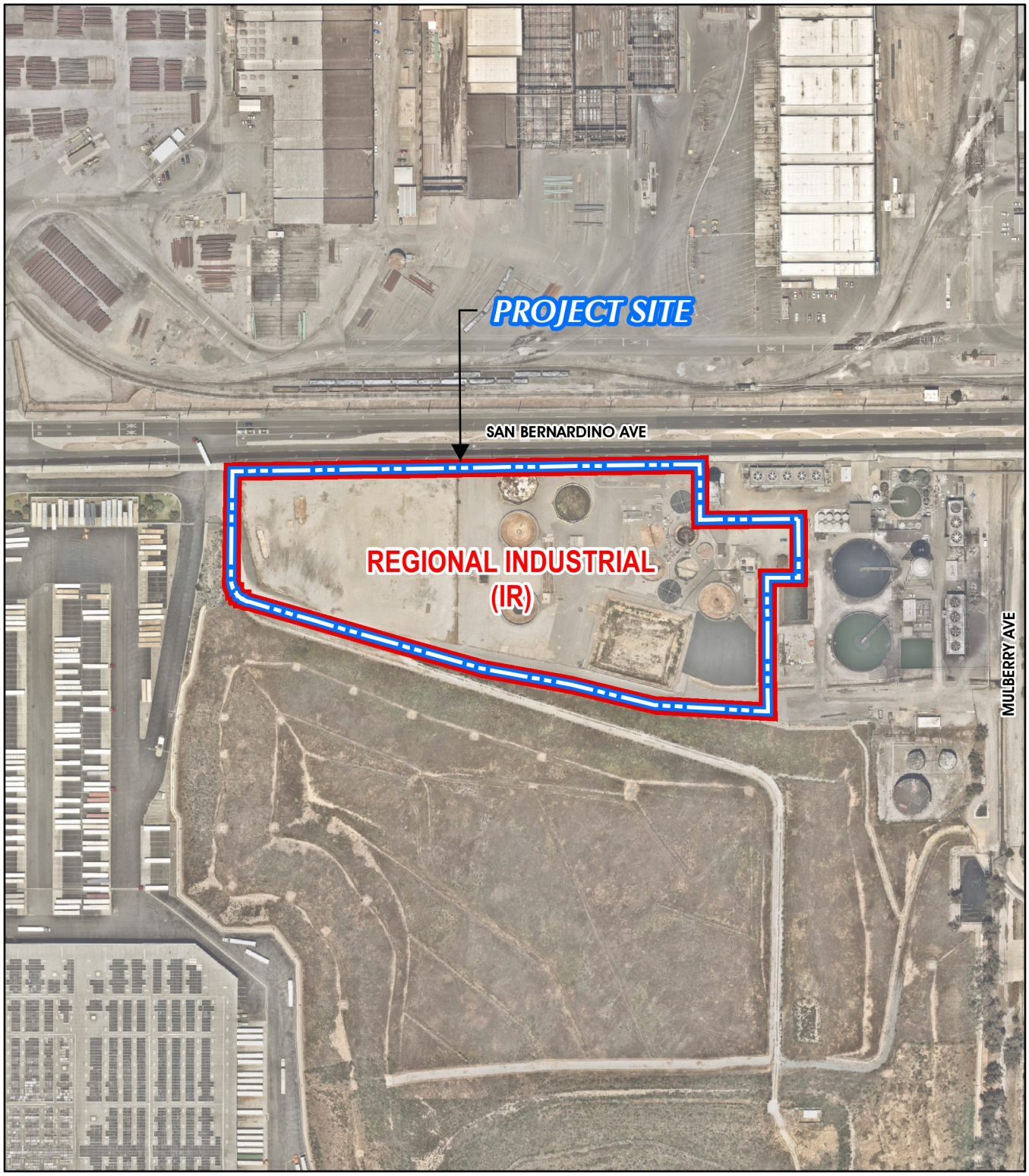
Aesthetics and Topographic Features

The Project site is perceived as flat, with a topographic high point of approximately 1,057 feet above mean sea level (amsl) in the northern portion of the Project sit and a topographic low point of approximately 1,054 feet amsl in the southern portion of the Project site. The overall topographic relief of the Project site is approximately five (5) feet. Figure 9, *USGS Topographic Map*, illustrates the topographic character of the Project site.

The Project site's aesthetic character is primarily defined by the dilapidated remains of an abandoned wastewater treatment facility. The eastern portion of the Project site contains twelve (12) partially below-grade concrete tanks. The tanks range in size from 30 to 80± feet in diameter and 3 to 15± feet in depth. A rectangular basin with dimensions of 150 by 180± feet is located in the southeastern portion of the Project site. Additionally, two former office/control buildings are located in the central areas of the Project site. These structures, ranging from 630 to 725± s.f. in size, are of brick and wood-frame construction. Ground surface cover in the eastern portion of the Project site consists of asphaltic concrete.

The western half of the project site supports disturbed areas that are subject to routine disturbances (e.g., including weed abatement activities, soil stockpiling), and is covered with a layer of loose gravel.

The existing aesthetic conditions of the Project site are presented on Figure 10, *Site Photograph Key Map*, and Figure 11, *Project Site Photos 1-3*.



Source(s): ESRI, Nearmap Imagery (2019), SB County (2019)

0 75 150 300 Feet

Figure 6

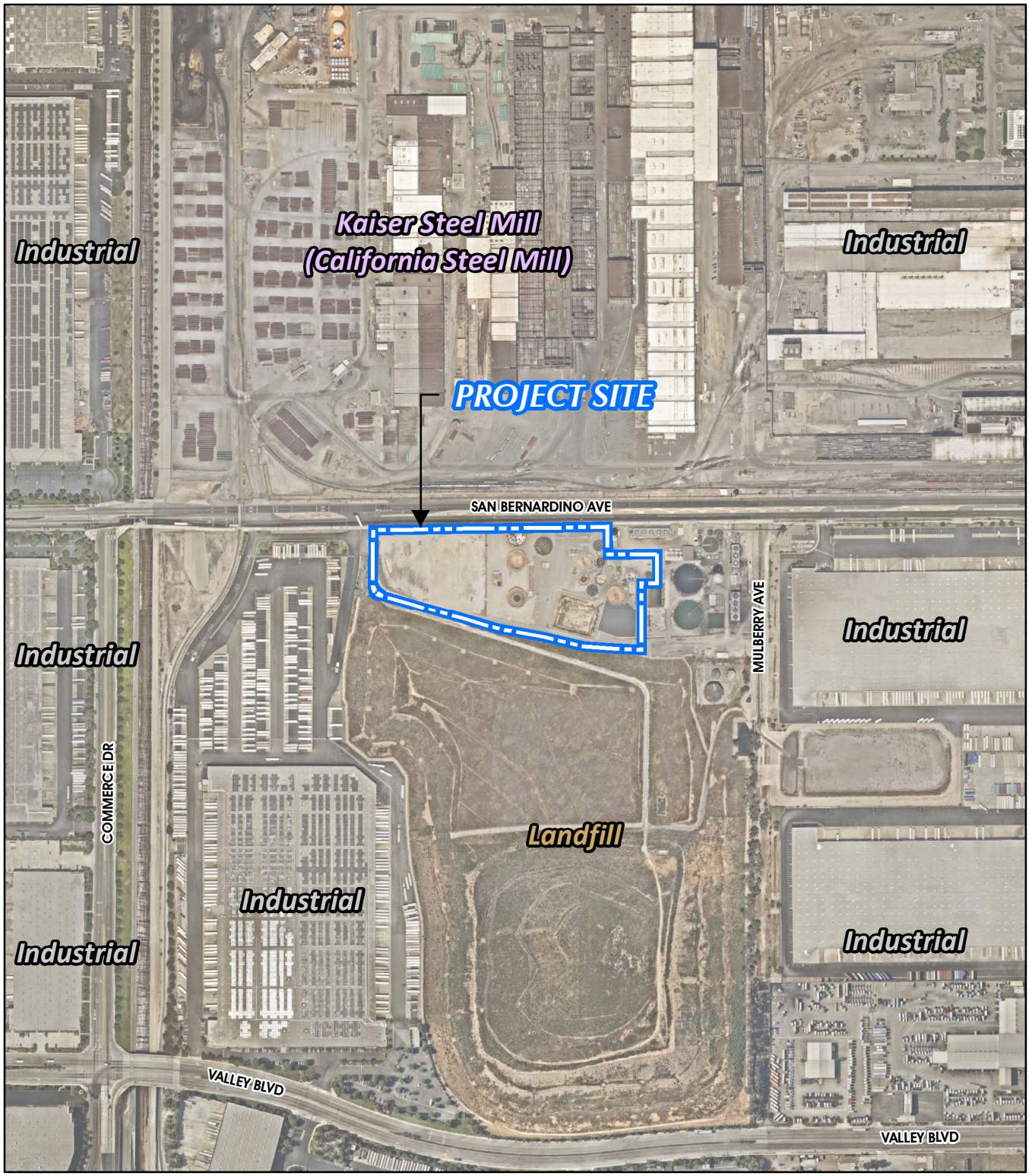
County of San Bernardino General Plan
Land Use Zoning District Map

Source(s): ESRI, Nearmap Imagery (2019), SB County (2019)

Figure 7

0 75 150 300 Feet

Aerial Photograph

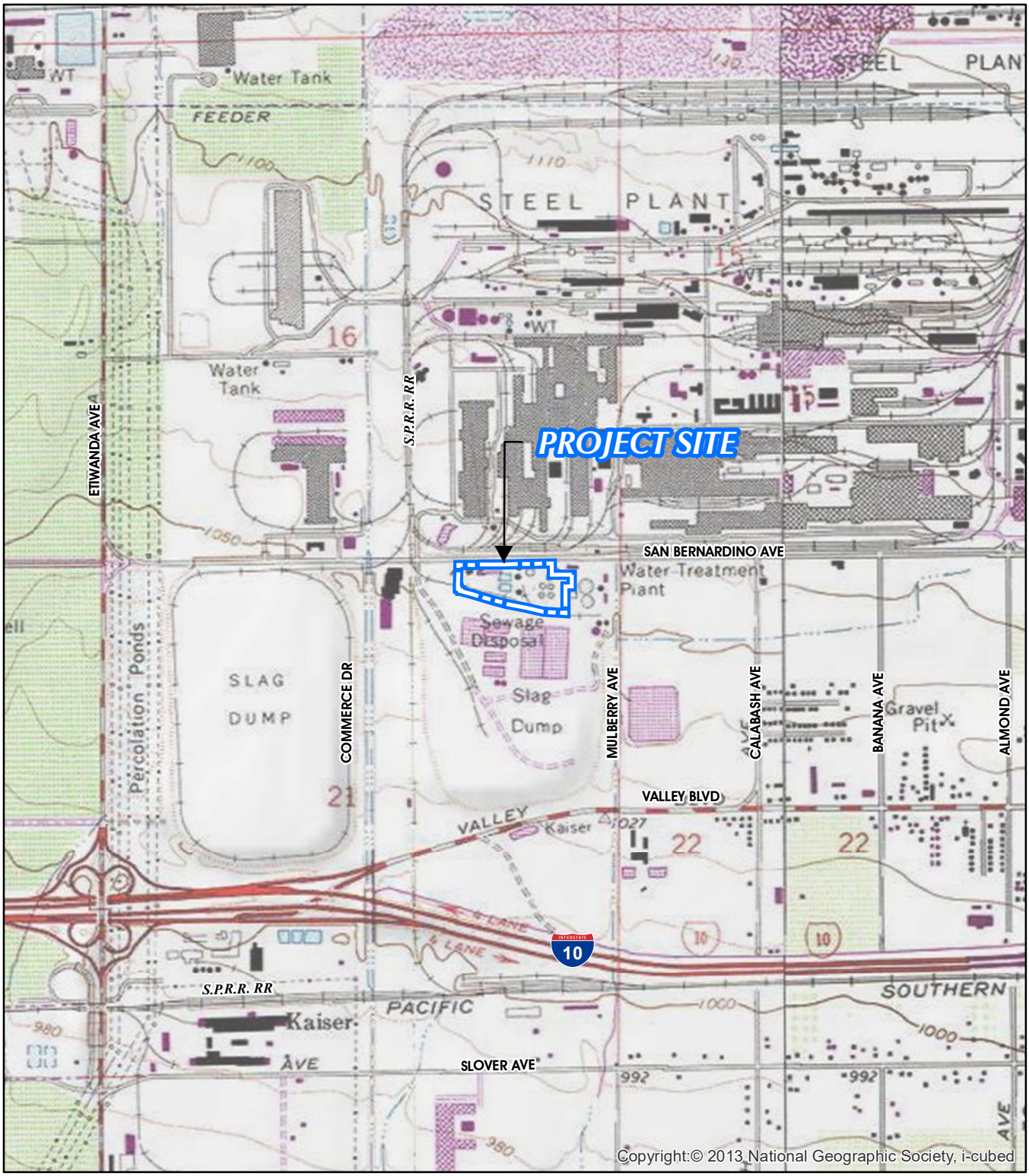


Source(s): ESRI, Nearmap Imagery (2019), SB County (2019)

Figure 8

0 150 300 600 Feet

Surrounding Land Uses and Development



Source(s): USGS (2013)

Figure 9

0 375 750 1,500 Feet

USGS Topographic Map

Source(s): ESRI, Nearmap Imagery (2019), SB County (2019)

Figure 10

0 75 150 300 Feet

Site Photograph Key Map

Site Photo 1: Northwest of the Project Site, along San Bernardino Avenue, looking East to Southeast.

Site Photo 2: North of the Project Site, along San Bernardino Avenue, looking East to West.

Site Photo 3: Northeast of the Project Site, along San Bernardino Avenue, looking East to West.

Figure 11

Not to Scale

Project Site Photos 1-3

Site Access and Circulation

The northern boundary of the Project site abuts San Bernardino Avenue, an east-west oriented roadway. The Project site receives access from and provides access to San Bernardino Avenue via two existing driveways located at the northeastern and northwestern portions of the Project site.

The Project site is located approximately 0.7-mile north of Interstate 10 (I-10), an east-west oriented freeway, and approximately 1.9 miles east of Interstate 15 (I-15), a north-south oriented freeway. Both I-10 and I-15 are part of the state highway system operated by the California Department of Transportation (CalTrans).

The Project area is currently served by Omnitrans, a public transit agency serving various jurisdictions within San Bernardino County, with bus service along San Bernardino Avenue via Route 61. The stops for Route 61 nearest to the Project site are located approximately 0.20-mile west of the site (San Bernardino Avenue at Commerce Drive) and approximately 0.3-mile east of the site (San Bernardino Avenue at Calabash Avenue).

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 (O3) concentrations, and particulate matter (PM_{10} and $PM_{2.5}$) 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, 2020a, p. 20). Refer to Table 2-4 of the Air Quality Impact Analysis prepared for the Project (*Technical Appendix A*) for a detailed summary of air quality conditions in the vicinity of the Project site over the last three years.

The SCAQMD conducted an in-depth analysis of toxic air contaminants and their associated health risks within the SCAB. This study, titled "Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES IV)," shows that the average excess cancer risk from exposure to air pollution fell within the SCAB by approximately 50% in the 10 years prior to the publishing of the MATES IV. Nonetheless, MATES IV calculated that the Project area has an ambient carcinogenic risk of 1,062.55 in one million persons (Urban Crossroads, 2020a, p. 34). 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 Initial Study/MND.

Geology

There are no known active or potentially active earthquake faults within the Project site, and the Project site is not located within an "Alquist-Priolo" Special Studies Zone (SoCalGeo, 2019, p. 10). 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 2019, no groundwater was encountered at any of the boring samples (up to 25 feet below existing ground surface). Accordingly, the static groundwater table at the Project site is considered to exist at depths in excess of 25 feet below existing ground surface (SoCalGeo, 2019, p. 18).

Soils

The Project site features undocumented fill soils extending to depths of 6½ to 17± feet below the ground surface. Native alluvial soils were encountered beneath the fill soils. The native alluvium generally possesses medium dense to very dense relative densities; however, some loose alluvium was encountered to depths of up to 8± feet below the ground surface. (SoCalGeo, 2019, p. 1)

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, 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 Federal Emergency Management Agency (FEMA) Flood Insurance Rate Panel 06071C8634J, the approximate western half of the Project site is located within "Flood Zone X (unshaded)" which corresponds with areas outside the 500-year floodplain (i.e., less than 0.2-percent annual chance of flood) and the approximate eastern half of the Project site is located in "Flood Zone X (shaded)" which corresponds to areas within the 500-year floodplain (i.e., 0.2-percent annual chance of flood).

Under existing conditions, runoff from the east portion of the Project site flows from north to south and drains into an existing channel along the east and south property lines; the channel flows east. Runoff from the middle and western portions of the Project site flows from the north to the south/southwest and drains into an existing channel along the southern property line; the channel continues flowing west to an existing private storm drain line and, then, the San Sevaine Channel. The San Sevaine Channel outlets to the Santa Ana River. (Huitt-Zollars, Inc., 2019, p. 1)

Noise

Noise generated on or within the vicinity of the Project site under existing conditions is dominated by transportation-related noise associated with surface streets as well as background industrial activity. Based on 24-hour noise measurements collected by the consulting firm Urban Crossroads September 26, 2019, hourly noise levels in the Project area range between 51.9 equivalent decibels (dBA Leq) and 73.1 dBA Leq (Urban Crossroads, 2019a, Table 5-1).

Utilities and Service Systems

Under existing conditions, the Project area receives domestic water service from the Fontana Water Company (FWC). Wastewater generated on the Project site is conveyed into the local sanitary sewer system for transmission to larger regional conveyance facilities and ultimately to wastewater treatment facilities (RP-1 or RP-4) operated by the Inland Empire Utilities Authority (IEUA). Existing sewer and water lines are located beneath San Bernardino Avenue along the Project site frontage.

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. Solid waste generated by the Project would be disposed of at the Mid-Valley Landfill.

Vegetation

On-site and surrounding land uses have eliminated naturally occurring habitats from the Project site and immediately surrounding area. The eastern half of the Project site is limited to areas that have been developed, with the exception of an earthen basin near the southeast corner of the Project site with maintained side slopes. The western half of the project site supports disturbed areas that have subject to routine disturbances (e.g., including weed abatement activities, soil stockpiling, and anthropogenic disturbances), and is covered with a layer of loose gravel. (ELMT, 2019)

ADDITIONAL APPROVALS REQUIRED BY OTHER PUBLIC AGENCIES

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

- Federal: N/A
- State of California: California Fish & Wildlife, South Coast Air Quality Management District (MDAQMD)
- County of San Bernardino: Land Use Services – Building and Safety, Traffic, Land Development Engineering – Roads/Drainage; Public Health – Environmental Health Services; Public Works, Surveyor; and County Fire
- Local: N/A

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Tribal consultation request letters were sent to the San Manuel Band of Mission Indians (SMBMI), Morongo Band of Mission Indians (Morongo), Colorado River Indian Tribes (CRIT), Fort Mohave Indian Tribe (FMIT), Soboba Band of Luiseno Indians, and Twenty-Nine Palms Band of Mission Indians. Response letters were received from FMIT, SMBMI, and Morongo. The FMIT indicated that the Project as described shows that there is no substantial evidence that there would be a significant effect on FMIT tribal cultural resources. Formal consultation was requested by the SMBMI which took place on November 17, 2019, and also by the Morongo which took place on January 16, 2020. The resulting recommended mitigation and monitoring measures have been added to *Section V, Cultural Resources,* and *Section XVIII, Tribal Cultural Resources,* of the Initial Study Checklist.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The Project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the Project on the factor and its elements. 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.

At the end of the analysis, the required mitigation measures are restated and categorized as being either self-monitoring or as requiring a Mitigation Monitoring and Reporting Program (MMRP).

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

DETERMINATION:

Based on this initial evaluation, the following finding is made:

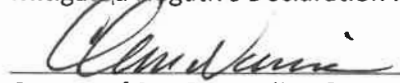
☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been 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.

ADeLucaJr — 9/22/2020

Mitigated Negative Declaration Preparer Signature — Date

Anthony DeLuca

Mitigated Negative Declaration Preparer Printed Name

 — 9-22-2020

County of San Bernardino Supervising Planner Signature — Date

Chris Warrick

County of San Bernardino Supervising Planner Printed Name

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

I-a) **Less-than-Significant Impact.** The San Bernardino County General Plan does not designate any specific scenic vistas throughout the County; however, General Plan Policy OS 5.1 states that a scenic resource "offers a distant vista that provides relief from less attractive views of nearby features (such as views of mountain backdrops from urban areas) (San Bernardino County, 2014)." According to the County's definition of a scenic resource, the nearby San Gabriel Mountains (located approximately 7.1 miles north of the Project site) and Jurupa Hills (located approximately 4.8 miles southeast of the Project site) are considered scenic resources because they offer a distant vista that provides a scenic relief from the Project area's urban character (Google Earth, 2019). However, views of the San Gabriel Mountains and Jurupa Hills are mostly obstructed from public viewing areas abutting the Project site (i.e., San Bernardino Avenue) by a combination of existing off-site development and atmospheric haze and smog that is common in the region throughout the year. Refer to Figure 11 for additional context regarding the view of the Project site area.

Because the Project site is located south of San Bernardino Avenue, development on the Project site would not affect views of the San Gabriel Mountains because views of the Mountains are only available by looking north from San Bernardino Avenue. Proposed development on the Project site likely would block views of the Jurupa Hills from the San Bernardino Avenue segment that abuts the Project site; however, this affect is not considered substantial because views of the Hills are almost

entirely blocked under existing conditions by the existing landfill to the south of the Project site and existing off-site industrial development (located east and southeast of the Project site). Because the Project site is not designated as a scenic vista and because the Project would not affect prominent, unobstructed views of scenic resources, implementation of the Project would result in a less-than-significant impact to scenic vistas.

I-b) **No Impact.** The nearest Caltrans-designated State scenic highway is a 4.2-mile portion of State Route 91 (SR-91) beginning from State Route 55 and terminating at the City of Anaheim's City Limit (Caltrans, 2017). Due to distance, topography, and intervening development, the Project site is not visible from this scenic segment of SR-91 and the Project would not have the potential damage any scenic resources within the SR-91 scenic corridor. Additionally, there are no roadways in proximity to the Project site that are eligible for the State scenic highway designation. Moreover, the nearest County designated scenic route is Beaumont Avenue within the Loma Linda sphere of influence (SOI), located approximately 16 miles southeast of the Project site (Google Earth, 2019; San Bernardino County, 2014, pp. VI-13 - VI-14). Due to distance, topography, and intervening development, the Project site is not visible from the County-designated scenic segment of Beaumont Avenue and would not have the potential to damage any scenic resources within the Beaumont Avenue scenic corridor. Based on the foregoing, redevelopment of the Project site would not have a substantial effect on scenic resources within a state scenic highway corridor. Implementation of the Project would result in no impact.

I-c) **Less-than-Significant Impact.** According to the United State Census Bureau (USCB), the Project site is in an urbanized area (USCB, 2012). The Project Applicant proposes to redevelop the Project site with a land use that is permitted within the site's existing IR land use designation and zoning classification. The County of San Bernardino reviewed the Project proposal in detail and determined that no component of the Project would conflict with applicable design regulations involving building architecture, landscaping, infrastructure, and road system design standards within the San Bernardino County Development Code and no impact would occur. Furthermore, the Project site is currently occupied by an abandoned wastewater treatment facility; implementation of the Project would result in the redevelopment of the site with a modern warehouse building and associated improvements such as landscaping, parking areas, exterior lighting, and signage. The proposed warehouse building would incorporate a neutral color palette that complements surrounding development and would feature accent elements, such as parapets, wall recesses, mullions, and aluminum canopies for visual interest. The Project's landscape plan incorporates plant species that maintain vibrancy during drought conditions. Additionally, the proposed facility includes loading docks and truck parking areas that face south and are positioned away from public views. The Project's visual features would complement the surrounding development and would improve the visual quality of the Project site relative to existing conditions. Based on the foregoing analysis, implementation of the Project would result in a less than significant impact on the visual/scenic quality of the Project site.

I-d) **Less-than-Significant Impact.** Under existing conditions, there is minimal light and glare in the Project area, consisting primarily of streetlights along San Bernardino Avenue (abutting the site's northern boundary).

The Project provides exterior lighting; however, the installation of exterior lighting would be ancillary to the proposed warehouse building. The Project would be required to adhere to the County's outdoor lighting requirements established in the County's Development Code. Section 83.07.030 (Glare and Outdoor Lighting – Valley Region) of the County's Development Code requires that "outdoor lighting of commercial or industrial land uses shall be fully shielded to preclude light pollution or light trespass on any of the following: an abutting residential land use zoning district; a residential parcel; or public right-of-way." 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 requirements prior to issuance of building permits (San Bernardino County, 2019). Project compliance with the County's Development 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 Project would involve the construction of one (1) warehouse building with exterior building surfaces that consist of painted concrete tilt-up panels and green-glazed glass. While window glazing has the 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. Painted concrete surfaces would have no potential for glare. Accordingly, a less-than-significant daytime glare impact would occur.

The Project does not propose to install rooftop solar panels; however, areas of the roof of the proposed warehouse building are designed to 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 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 environmental 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. AGRICULTURAL RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

II-a) **No Impact.** According to the Farmland Mapping and Monitoring Program from the Department of Conservation (DOC), the Project site is designated as "Urban and Built-Up land;" therefore, the Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance to non-agricultural use (DOC, 2016a). Implementation of the Project would result in no impact.

II-b) **No Impact.** The Project site is zoned IR land uses according to the San Bernardino County General Plan Land Use Map and there are no properties zoned for agricultural land uses in the Project vicinity (San Bernardino County, 2009). Therefore, implementation of the Project has no potential to conflict with existing zoning for an agricultural use. No impact would occur.

According to mapping and information from the DOC, neither the Project site nor any land in the site's vicinity are under a Williamson Act Contract (DOC, 2016b). Accordingly, implementation of the Project has no potential to conflict with a Williamson Act Contract. No impact would occur.

II-c) **No Impact.** The Project site is zoned for (IR) land uses and is not zoned for forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land (San Bernardino County, 2009). Therefore, implementation of the Project has no potential to conflict with or cause the rezoning of any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. Implementation of the Project would result in no impact.

II-d) **No Impact.** Neither the Project site nor the surrounding area contains forest land (Google Earth, 2019; ELMT, 2019). Accordingly, implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use.

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." As noted above in Response II(a), the Project site does not contain any soils mapped by the DOC as "Farmland." Additionally, as described above in Responses II(c) and II(d), the Project site and surrounding areas do not contain forest lands or areas designated for forest land uses. Thus, implementation of the Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

No significant adverse environmental 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 district or air pollution control district may be relied upon to make the following determinations Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Urban Crossroads, Inc. (Urban Crossroads) prepared an *Air Quality Impact Analysis* and a *Mobile Source Health Risk Assessment* for the Project 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 Appendix A* and *B*, respectively, to this Initial Study/MND 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). The SCAB. The SCAB encompasses approximately 6,745-square miles that includes non-desert 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, respectively; and the San Diego County line to the south. Within the SCAB, the South Coast Air Quality Management District (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.

Historically and presently, the State and federal air quality standards have been/are exceeded in most parts of the SCAB. 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 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. Criteria for determining consistency with the *AQMP* are defined in

Chapter 12 of the SCAQMD's *CEQA Air Quality Handbook (1993)*. The Project's consistency with these criteria is discussed below.

Consistency Criterion No. 1*: The proposed 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). CAAQS and NAAQS violations would directly occur if SCAQMD's localized significance thresholds (LST) were exceeded and would indirectly occur if SCAQMD's regional significance thresholds were exceeded (as excessive regional pollutant emissions would delay the attainment of air quality standards). As discussed in Response III-b, below, the regional and localized air pollutant emissions from Project construction and operation would not exceed applicable regional significance thresholds and LSTs. As such, the Project would not conflict with Consistency Criterion No. 1.

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 regional emissions levels are based on land use planning data provided by lead agencies via their general plans. Development projects that increase the intensity of a use on a specific property beyond the respective general plan's vision may 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 consistent with the growth assumptions in the *AQMP*. The prevailing planning document for the Project site is the San Bernardino County General Plan. According to the San Bernardino County General Plan Land Use Zoning Districts Map, the Project site is designated for IR land uses (San Bernardino County, 2009). The Project would be consistent with the General Plan land use designation for the subject property and, therefore, the Project would be consistent with the growth assumptions used in the *AQMP* and would not exceed the *AQMP*'s long-term emissions projections.

For the reasons stated above, implementation of 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*. Implementation of the Project would result in a less than significant impact.

III-b) Less-than-Significant Impact. The Project has the potential to generate substantial air pollution during both construction activities and long-term operation. The following analysis is based on the applicable significance thresholds established by the SCAQMD for regional criterial pollutant emissions (as summarized in Table 3-1 of *Technical Appendix A*). This analysis assumes that the 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, "PM_{10} 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."

In general, air pollutants have adverse effects to human health including, but not limited to, respiratory illness and carcinogenic effects; however, based on available modeling it is not feasible to correlate regional criteria pollutant emissions from development projects of the scale of the proposed Project to adverse health effects on a SCAB-wide level. The potential for the Project to result in substantial adverse health effects from localized toxic air contaminant emissions is addressed in Response III-c, below.

Construction Emissions Impact Analysis

For purposes of the construction emissions analysis, construction was conservatively expected to occur between May 2020 and December 2020. The California Emissions Estimator Model (CalEEMod) accounts for the implementation and enforcement of California's progressively more restrictive regulatory requirements for construction equipment and the ongoing replacement of older construction fleet equipment with newer, less-polluting equipment. Thus, according to the CalEEMod, construction activities that occur in the near future are expected to generate more air pollutant emissions than the same activities that may occur farther into the future. Additionally, CalEEMod calculates maximum daily emissions for summer and winter periods. Accordingly, under the assumed scenarios and because it is likely that the Project's construction period will occur later than the starting date expected by this analysis, Project-related construction emissions are not expected to exceed the quantified values herein. (Urban Crossroads, 2020a, pp. 39-41) The Project's construction characteristics and construction equipment fleet assumptions used in the analysis were previously described in the "Project Description" included herein (and Tables 3-2 and 3-3 of *Technical Appendix A*). The calculated maximum daily emissions associated with Project construction are presented in Table III, *Summary of Construction-Related Emissions*.

As shown in Table III, the Project's daily construction emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_X) carbon monoxide (CO), sulfur oxides (SO_X), 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, NOX, CO, SO_X, $PM_{10,}$ and $PM_{2.5}$ would be less than significant.

Table III Summary of Construction-Related Emissions

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2020	48.23	76.01	47.20	0.15	10.07	6.02
Winter						
2020	48.24	76.15	45.54	0.14	10.07	6.02
Maximum Daily Emissions	**48.24**	**76.15**	**47.20**	**0.15**	**10.07**	**6.02**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-4)

Operational Emissions Impact Analysis

Operation of the Project is 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 IV, *Summary of Peak Operational Emissions*.

Table IV Summary of Peak Operational Emissions

Operational Activities – Summer Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	3.82	5.20e-04	0.06	0.00	2.00e-04	2.00e-04
Energy Source	0.06	0.50	0.42	3.01e-03	0.04	0.04
Mobile Source (Passenger Car)	0.79	0.73	11.40	0.03	2.94	0.79
Mobile Source (Truck)	0.73	20.69	5.15	0.07	2.82	1.02
On-Site Equipment Source	0.15	1.79	0.78	3.17e-03	0.06	0.05
Total Maximum Daily Emissions	**5.54**	**23.72**	**17.80**	**0.11**	**5.85**	**1.90**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Operational Activities – Winter Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	3.82	5.20e-04	0.06	0.00	2.00e-04	2.00e-04
Energy Source	0.06	0.50	0.42	3.01e-03	0.04	0.04
Mobile Source (Passenger Car)	0.72	0.77	9.23	0.03	2.94	0.79
Mobile Source (Truck)	0.71	21.40	4.61	0.07	2.81	1.01
On-Site Equipment Source	0.15	1.79	0.78	3.17e-03	0.06	0.05
Total Maximum Daily Emissions	**5.45**	**24.46**	**15.19**	**0.10**	**5.85**	**1.90**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-7)

As shown in Table IV, Project-related operational emissions of VOCs, 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. The Project's long-term emissions of VOCs, NO_X, CO, SO_X, $PM_{10,}$ and $PM_{2.5}$ would be less than significant.

Based on the foregoing analysis, implementation of the Project would not result in a cumulatively considerable net increase of any criteria pollutant.

III-c) 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. The following analysis is based on the applicable significance thresholds established by the SCAQMD.

A recent Supreme Court of California decision, *Sierra Club v. County of Fresno (Friant Ranch)*, states that CEQA documents should relate a project's expected adverse air quality impacts to likely human health consequences or explain why it is not feasible at the time of preparing the CEQA document to provide such an analysis. Although Project-related activities would not produce substantial concentrations of air pollutants, as described in the analysis presented below, the potential health consequences associated with localized criteria pollutant emissions were considered. Although as explained below it may be misleading and unreliable to attempt to specifically quantify the health risks associated with Project-related criteria pollutant emissions, the Project's air quality impact analysis (*Technical Appendix A*) and mobile source health risk assessment (*Technical Appendix B*) provide extensive information concerning the quantifiable and non-quantifiable health risks related to Project construction and long-term operation. Refer to these technical appendices for additional information.

As noted in the Brief of Amicus Curiae by the SCAQMD in the *Friant Ranch* case (hereafter, "Brief"), the SCAQMD – which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State – indicated that quantifying specific health risks that may result from criteria air pollutants from development proposals at the scale of the Project would be unreliable and misleading due to the relatively small-scale of the Project (from a regional perspective), unknown variables related to pollutant generation/release and receptor exposure, and regional model limitations. (SCAQMD, 2015) Accordingly, current scientific, technological, and modeling limitations prevent accurate and quantifiable relation of the Project's localized criteria pollutant emissions to likely health consequences for local and regional receptors other than as disclosed in the analysis below.

<u>Localized Construction Emissions Impact Analysis</u>
As summarized in Table V, *Summary of Localized Construction Emissions*, localized emissions of NO_X, CO, and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed applicable SCAQMD thresholds during peak Project construction activities. Accordingly, Project construction would not expose any sensitive receptors to substantial NO_X, CO, and particulate matter concentrations. Implementation of the Project would result in less than significant impacts.

Table V Summary of Localized Construction Emissions

On-Site Demolition Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**33.20**	**21.75**	**2.94**	**1.74**
SCAQMD Localized Threshold	118	667	196	98
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
On-Site Site Preparation Emissions	**Emissions (lbs/day)**			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**42.42**	**21.51**	**9.86**	**5.96**
SCAQMD Localized Threshold	144	820	201	101
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
On-Site Grading Emissions	**Emissions (lbs/day)**			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**50.20**	**31.96**	**5.80**	**3.43**
SCAQMD Localized Threshold	203	1,230	213	109
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-10)

Localized Operational Emissions Impact Analysis

As summarized in Table VI, *Summary of Localized Operational Emissions*, localized emissions of NO_X, CO, and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed applicable SCAQMD thresholds during Project operation. Accordingly, implementation of the Project would not expose any sensitive receptors to substantial NO_X, CO, and particulate matter concentrations. Impacts would be less than significant.

Table VI Summary of Localized Operational Emissions

Operational Activity	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**3.40**	**2.09**	**0.38**	**0.18**
SCAQMD Localized Threshold	270	1,746	62	29
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-12)

Carbon Monoxide (CO) "Hot Spot" Impact Analysis

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 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, 2020a, pp. 54-56) 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. Implementation of the Project would result in a less than significant impact.

Diesel Particulate Matter Emissions Impact Analysis

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. To evaluate the Project's potential to expose sensitive receptors within 0.25-mile of the Project site and the Project's primary truck travel routes 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 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), a group of existing non-conforming homes located approximately 2,300 feet southeast of the Project site (abutting Calabash Avenue), the maximum incremental cancer risk attributable to Project DPM emissions is 0.12 in one million, which does not exceed SCAQMD's threshold of 10 in one million. At this same location, non-cancer risks are 0.00004, which would not exceed the applicable SCAQMD threshold of 1.0. (Urban Crossroads, 2020b, p. 20) 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, implementation of the Project would result in a less-than-significant impact.

At the maximally exposed individual worker (MEIW), located approximately 36 feet to the east of the Project site, the maximum incremental cancer risk attributable to Project DPM emissions is 0.34 in one million, which does not exceed SCAQMD's threshold of 10 in one million. At this same location, non-cancer risks are 0.001, which would not exceed the applicable SCAQMD threshold of 1.0. (Urban Crossroads, 2020b, p. 20) Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of nearby worker receptors to substantial DPM emissions. Therefore, implementation of the Project would result in a less-than-significant impact.

At the maximally exposed individual school child (MEISC), located at the Live Oak Elementary School (approximately one-mile northeast of the Project site), the maximum incremental cancer risk attributable to Project DPM emissions is 0.03 in one million, which does not exceed SCAQMD's threshold of 10 in one million. At this same location, non-cancer risks are 0.00005, which would not exceed the applicable SCAQMD threshold of 1.0. (Urban Crossroads, 2020b, p. 20) Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of school child receptors to substantial DPM emissions. Therefore, implementation of the Project would result in a less-than-significant impact.

Based on the foregoing analysis, sensitive receptors would not be exposed to substantial pollutant concentrations due to Project operation or construction. Implementation of the Project would result in a less-than-significant impact.

III-d) 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, 2020a, pp. 59-60) 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 Project would include warehouse and high-cube warehouse distribution land use, 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 City'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, 2020a, pp. 59-60) As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people.

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

ELMT Consulting (ELMT) prepared a *Burrowing Owl Suitability Assessment* to document the Project site's existing conditions with respect to biological resources and determine the site's potential to provide habitat

for the western burrowing owl (*Athene cunicularia*). This report is included as *Technical Appendix C* to this this Initial Study/MND and its findings are incorporated into the analysis presented herein.

IV-a) **Less-than-Significant Impact.** Under existing conditions, the Project site is fully disturbed and devoid of naturally occurring habitats. Specifically, the eastern portion of the Project site is covered with a former wastewater treatment facility and the western portion of the site is disturbed, graded, maintained, and covered with gravel. (ELMT, 2019, p. 2) According to the County of San Bernardino's Biotic Resources Map for the Valley/Mountain Region, the Project site does not have the potential to support special-status plant or animal species known to occur in the area, with the exception of the burrowing owl (San Bernardino County, 2012). According to the Project site's *Burrowing Owl Suitability Assessment* (*Technical Appendix C*), no burrowing owls were observed on the Project site and no recent signs of burrowing owls (e.g., pellets, feathers, castings, white wash) were found on the Project site or within a 500-foot radius of the Project site. The Project site lacks suitable burrows capable of providing roosting and nesting opportunities and on-site disturbances have likely discouraged the use of the Project site by burrowing owls. Additionally, surrounding power poles, buildings, and towers further decrease the likelihood that burrowing owls would occur on-site as these features provide perching opportunities for larger raptor species that prey on burrowing owls. Based on the results of the field investigation, ELMT determined that the Project site does not provide suitable habitat for the burrowing owl. (ELMT, 2019, p. 3) Due to the lack of suitable habitat for the burrowing owl and the absence of any evidence that the owl is using or has used the Project site, impacts to the burrowing owl are determined to be less than significant. Implementation of the Project would result in less than significant impacts species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

IV-b) **No Impact.** Under existing conditions, the Project site is fully disturbed and no riparian habitats or natural communities are found on or adjacent to the Project site (Google Earth, 2019; ELMT, 2019, p. 2). As such, the Project has no potential to result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local regional plans, policies, or regulations or by the CDFW or USFWS. Implementation of the Project would result in no impact.

IV-c) **No Impact.** Under existing conditions, the Project site is fully disturbed and does not contain any protected wetland or aquatic resources, including but not limited to, natural drainages or watercourses, wetland habitat, marsh, vernal pool, or coastal resources (Google Earth, 2019; ELMT, 2019, p. 2). As such, the Project would not result in a substantial adverse effect on federally protected wetlands through direct removal, filing, hydrological interruption, or other means. Implementation of the Project would result in no impact.

IV-d) **Less-than-Significant Impact.** Under existing conditions, the Project site is fully disturbed and does not contain any natural bodies of water (Google Earth, 2019). As such, there is no potential for the Project to interfere with the movement of fish. Additionally, there are no native wildlife nurseries

on-site nor does the site contain any trees or vegetation that could support nesting birds; therefore, the Project has no potential to hinder the use of a wildlife nursery site (San Bernardino County, 2012; ELMT, 2019, p. 2). The Project site is disturbed and surrounded by industrial development and neither abuts large, contiguous open space areas nor connects to an established wildlife corridor (Google Earth, 2019). Accordingly, the Project area does not support wildlife movement corridors and implementation of the Project would not substantially interfere with wildlife movement. Based on the foregoing analysis, implementation of the Project would result in a less-than-significant-impact.

IV-e) **No Impact.** The County of San Bernardino does not have any policies or ordinances in place to protect biological resources that are applicable to the Project or Project site. Implementation of the Project would result in no impact.

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 have the potential to conflict with any such plan. Implementation of the Project would result in no impact.

No significant adverse environmental impacts are identified; however, in an abundance of caution, the following condition of approval is recommended to ensure Project implementation does not adversely affect the burrowing owl:

COA BIO-1: Within 30 days prior to grading, a qualified biologist shall conduct a survey of the Project 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 the CDFW relocation protocol and shall only occur between September 15 and February 1. If a 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.

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 pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

A *Cultural Resources Study* was prepared for the Project site by Brian F. Smith and Associates, Inc. (BFSA) to identify potential archaeological and historical resources that may be affected by implementation of the Project. The *Study* includes 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. This report is included as *Technical Appendix D* to this Initial Study/MND and its findings are incorporated into the analysis presented herein.

V-a) **No Impact.** The Project site contains 28 structures that were associated with the former Kaiser Steel Mill, which is considered a Point of Historical Interest and was previously recorded as historic site SBR-4131H. The structures observed on the Project site include the following:

- Structures 1 to 3, 13 and 14: Subterranean concrete filtration tank
- Structures 4 and 18: Subterranean concrete tank with a metal basin
- Structures 5, 6, and 10 to 12: Aboveground concrete filtration tank
- Structures 7, 15 to 17, and 26: Concrete building
- Structure 8: Concrete cistern
- Structure 9: Rectangular runoff basin
- Structure 19, 20, and 25: Concrete foundation
- Structure 21: Subterranean concrete pump station on the south of Structure 15
- Structures 22 to 24: Metal water silos
- Structure 27: Concrete and metal channel
- Structure 28: Pump or power station

Structures 25 through 28 are considered modern structures as they were constructed after 1994 and, therefore, are not considered to be potential historic resources pursuant to CEQA Guidelines Section 15064 (BFSA, 2019a, pp. 3.0-41, 4.0-1). Of the older on-site structures (i.e., Structures 1 through 24),

none were determined to retain integrity of their original design, setting, workmanship, feeling, or association due to extensive modifications and the loss of the overall integrity for SBR-4131H (as a large portion of the original steel mill was demolished and replaced with the Auto Club Speedway). Further, none of the structures contain important architecture nor are they associated with any significant events or people. Lastly, because SBR-4131H has been extensively documented and researched – and a portion of the site has been impacted by development – the structures on the Project site are not likely to yield additional or new information concerning the Kaiser Steel Mill or the general area. In consideration of all of the foregoing information, Structures 1 through 24 were all determined to not be historic resources pursuant to CEQA Guidelines Section 15064.5. (BFSA, 2019a, pp. 3.0-1-3.0-41, 4.0-1) Implementation of the Project would result in no impact.

V-b) **Less than Significant Impact with Mitigation Incorporated**. BFSA conducted a cultural resources inventory of the Project site, which included a records search with the South Central Coastal Information Center (SCCIC) at California State University (CSU) Fullerton and an intensive pedestrian survey of the site. According to the archival records search, no prehistoric resources have been previously recorded on or within a one-mile radius of the Project site and, according to the pedestrian survey, no prehistoric resources were observed on the site (BFSA, 2019a, pp. 1.0-14-1.0-16, 3.0-41) Furthermore, due to the lack of known prehistoric archaeological resources in the vicinity of the Project site and the extensive nature of past ground disturbances, the likelihood of discovering buried prehistoric archaeological resources on the Project site is considered low (BFSA, 2019a, pp. 1.0-14, 3.0-41, 5.0-1). Notwithstanding, in the event that Project construction activities encroach undisturbed soils, there is the potential (albeit low) for subsurface (i.e., buried) prehistoric resources to be present on the Project site. Accordingly, the Project Applicant would be required to implement mitigation measures (MMs) CR-1 through CR-3, 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-1 through MM CR-3, the Project's potential impacts to prehistoric archaeological resources would be reduced to less-than-significant levels.

V-c) **Less than-Significant impact.** The Project site does not contain a cemetery and no formal cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site (BFSA, 2019a, pp. 1.0-14-1.0-16, 3.0-41). In the highly unlikely event that human remains are unearthed during Project construction, the construction contractor would be required 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.

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 less-than-significant level:

MM CR-1 **Retain a Native American Monitor/Consultant:** The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant whose ancestral area is disturbed will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities, as defined by the Gabrieleño Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians, may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

MM CR-2 **Human Remains Discovery:** Upon discovery of human remains, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the on-site lead/construction manager, who will then notify the consulting Tribes, the qualified lead archaeologist, and the County coroner, pursuant to the State Health and Safety Code §7050.5, and that code will be enforced for the duration of the project. Work will continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined

to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) as mandated by state law who will then appoint a Most Likely Descendent (MLD).

MM CR-3 **Burials and Funerary Remains**: The MLD shall work with the Coroner, NAHC, Landowner, and Lead Agency regarding culturally appropriate practices and recommended next steps in the event that human remains are discovered during ground disturbing activities. The term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

If the San Manuel Band of Mission Indians is designated MLD in accordance with the legal process noted in CR-2, the MLD will work with the Coroner, NAHC, Landowner, and Lead Agency regarding culturally appropriate practices and recommended next steps.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VI. ENERGY				
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Urban Crossroads prepared an *Energy Assessment* for the Project to quantify anticipated energy usage associated with the construction and operation of the proposed Project, determine if the usage amounts are efficient, typical, or wasteful for the land use type, and identify any potential methods of avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. This report is included as *Technical Appendix E* to this Initial Study/MND and its findings are incorporated into the analysis presented herein.

VI-a) Less-than-Significant Impact.

Energy Use During Construction

The Project's construction process would consume electricity and fuel. Project-related construction activities would represent a "single-event" demand and would not require on-going or permanent commitment of energy resources. Project-related construction is estimated to consume approximately 33,561-kilowatt-hours (kWh) of electricity, 34,601 gallons of diesel fuel for construction equipment, 7,579 gallons of fuel for construction worker related trips, and 17,011 gallons of fuel for construction vendor and hauling trips. The equipment used for Project construction would conform to California Air Resources Board (CARB) regulations and California emissions standards. For example, CCR Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable construction projects; or equipment that would not conform to current emissions standards (and related fuel efficiencies). As supported by the preceding discussion, the Project's construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2020c, pp. 21-26)

Energy Use During Operation

Energy that would be consumed by Project-related traffic is a function of total vehicle miles traveled and the estimated vehicle fuel economies of vehicles accessing the Project site. The Project's estimated annual fuel consumption (both passenger vehicles and trucks) is 153,024 gallons. The number of daily trips and miles traveled by Project traffic are consistent with other warehouse uses of similar scale and configuration in the Inland Empire. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and/or vehicle miles traveled, nor associated excess and wasteful vehicle energy consumption. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of passenger vehicles to alternative energy sources (e.g., electricity, natural gas, bio fuels, hydrogen cells) would likely decrease future gasoline fuel demands per mile traveled. The location of the Project site proximate to regional and local arterial roadways is expected to minimize the Project vehicle miles traveled within the region. Based on the foregoing, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2020c, pp. 26-32)

Building operations and site maintenance activities associated with the Project would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by Southern California Gas Company (SoCalGas); electricity would be supplied to the Project by Southern California Edison (SCE). Project facility operational energy demands are estimated at 1,868,500 kilo-British thermal units (kBTU) of natural gas; and 1,562,682 kilowatt-hour (kWh) per year of electricity. The Project would be required to comply with Title 24 standards, which would ensure that the Project's energy demand would not be considered inefficient, wasteful, or otherwise unnecessary. Additionally, the proposed warehouse building would be designed and constructed in accordance with the Project Applicant's Leadership in Energy and Environmental Design (LEED) Volume Program, which ensures the Project would incorporate contemporary energy-efficient/energy-conserving designs and operational programs. Lastly, the Project proposes conventional warehouse uses, which are not inherently energy-intensive. Taken as a whole, the Project's total energy demands would be comparable to, or less than, other industrial projects of similar scale and configuration. (Urban Crossroads, 2020c, pp. 30, 32)

VI-b) Less-than-Significant Impact. The following section analyzes the Project's consistency with applicable federal and State energy regulations.

Consistency with Federal Energy Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided primarily by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because the Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2020c, p. 16)

The Transportation Equity Act for the 21st Century (TEA-21)
The Project site is located along major transportation corridors with proximate access to the interstate freeway system (i.e., Interstate 10 and Interstate 15). The location of the Project site facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar industrial uses. Accordingly, the Project supports the strong planning processes emphasized under TEA-21 and is therefore consistent with, and would not otherwise interfere with or obstruct implementation of TEA-21. (Urban Crossroads, 2020c, p. 16)

Consistency with State Energy Regulations
Integrated Energy Policy Report (IEPR)
Electricity would be provided to the Project by SCE and natural gas is provided by SoCalGas. SCE's Clean Power and Electrification Pathway (CPEP) white paper and SoCalGas' 2018 Corporate Sustainability Report builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the 2018 IEPR. (Urban Crossroads, 2020c, p. 17)

State of California Energy Plan
The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The location of the Project site facilitates access, acts to reduce vehicle miles traveled, and takes advantage of existing infrastructure systems. Therefore, the Project supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2020c, p. 17)

California Code Title 24, Part 6, Energy Efficiency Standards
The Project would design building shells and building components, such as windows; roof systems: electrical and lighting systems: and heating, ventilating, and air conditioning systems to meet 2019 Title 24 Standards. The Project also is required by State law to be designed, constructed, and operated to meet or exceed Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards. (Urban Crossroads, 2020c, p. 18)

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

A *Geotechnical Investigation* was prepared for the Project by Southern California Geotechnical, Inc. (SoCalGeo) to evaluate the geotechnical conditions of the Project site, to identify any geologic hazards, and

provide recommendations for future development of the Project. This report is included as *Technical Appendix F* to this Initial Study/MND and its findings are incorporated into the analysis presented herein.

VII-a) **i. No Impact.** There are no known active or potentially active earthquake faults on the Project site or within the immediate area of the Project site and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone (SoCalGeo, 2019, p. 10). Therefore, the Project does not have the potential to directly or indirectly expose people or structures to adverse effects related to ground rupture. Implementation of the Project would result in no impact.

ii. Less-than-Significant Impact. The Project site is in a seismically active area of Southern California and is expected to experience moderate-to-severe ground shaking during the lifetime of the Project. The Project site's risk of exposing people and structures to strong seismic ground shaking is not substantially different than that of other similar properties in the Southern California area and is considered adequately mitigated to protect public health, safety, and welfare if buildings are designed and constructed in conformance with applicable building codes and sound engineering practices. As a condition of Project approval, the Project would be required to be constructed in accordance with the California Building Standards Code (CBSC, Title 24, Part 11 of the California Code of Regulations) and the County of San Bernardino Building Code (Title 6, Division 3 of the San Bernardino County Code of Ordinances), which adopts of the CBSC with local amendments (San Bernardino County, 2019). 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 (Chapter 87.08 of the San Bernardino County Code of Ordinances) require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and provide site-specific recommendations including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems, to preclude adverse effects resulting from strong seismic ground-shaking. Pursuant to the County's Municipal Code, the County will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in *Technical Appendix F*. With mandatory compliance to the CBSC and the County's Municipal Code, as well as the standard and Project-specific design and construction recommendations set forth in the Project's geotechnical report, the proposed warehouse building would be constructed to withstand seismic ground shaking sufficiently to preclude a substantial risk to people or structures related to strong seismic ground shaking. Implementation of the Project would result in a less-than-significant impact.

iii. Less-than-Significant Impact. According to the Project-specific geotechnical investigation and the County's Geologic Hazards Map, the Project site is not located within an area of liquefaction susceptibility (SoCalGeo, 2019, p. 11; San Bernardino County, 2010). Accordingly, liquefaction is not

considered to be a design concern for the Project site. Implementation of the Project would result in a less-than-significant impact.

iv. No Impact. According to the County's Geologic Hazard Overlay Map, the Project area is not located in an area that is susceptible to landslides (San Bernardino County, 2010). Additionally, the Project site is virtually flat and contains no substantial natural or man-made slopes under existing conditions. The property located immediately south of the Project site is operated as a landfill and contains man-made slopes that are engineered to be stable. Accordingly, no slope or stability hazards are present at or near the Project site. Implementation of the Project would result in no impact.

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

Impact Analysis for Temporary Construction-Related Activities

Grading activities associated with the Project would temporarily expose underlying soils in the Project's grading footprint to water and air, which would increase erosion susceptibility during rainfall events or high winds while the soils are exposed. Pursuant to the requirements of the State Water Resources Control Board (SWRCB, 2014) the Project Applicant would be required to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. Additionally, during grading and other construction activities, the Project would be subject to the requirements established in Chapter 85.11.030 (Erosion Control Plan) of the San Bernardino County Development Code, which requires the Project Applicant to prepare a Stormwater Pollution Prevention Plan (SWPPP) that would identify the erosion control measures, such as construction fencing, sandbags, and other erosion-control features, that would be implemented during the construction phase to reduce the site's potential for soil erosion or the loss of topsoil. In addition, construction activities associated with the Project would be required to comply with SCAQMD Rule 403-Fugitive Dust, which would minimize wind-related erosion hazards during construction activities (SCAQMD, 2005). Mandatory compliance to the Project's NPDES permit and the regulatory requirements of San Bernardino County and the SCAQMD would ensure that water and wind erosion is minimized and not substantial. Implementation of the Project would result in a less-than-significant impact.

Long-term Operational Activities

Following construction, wind, and water erosion on the Project site on the site would be minimal because the Project site would be covered by landscaping and impervious surfaces and stormwater runoff discharge would be controlled through a storm drain system. Furthermore, the Project is subject to the provisions of the San Bernardino County NPDES Multiple Separate Storm Sewer System (MS4) Permit, which requires the Project Applicant to prepare and implement a Water Quality Management Plan (WQMP) (see Section 35.0118 of the San Bernardino Code of Ordinances). The WQMP provides a program of an effective combination of erosion control and sediment control

measures (i.e., Best Management Practices [BMPs]) to reduce or eliminate long-term discharge to surface water from stormwater and non-storm water discharges. A Preliminary WQMP prepared for the Project by Huitt-Zollars, Inc. incorporates catch basins that will convey on-site runoff to the proposed underground infiltration system (Huitt-Zollars, 2020). The proposed catch basin would include filters that remove waterborne pollutants from stormwater flows, including silt and sediment, and the proposed infiltration basins would facilitate percolation to maximize on-site infiltration and minimize off-site stormwater discharge. These design features would be effective at removing silt and sediment from stormwater runoff, and the WQMP requires post-construction maintenance and operational measure to ensure on-going erosion protection. Compliance with the WQMP and long-term maintenance of the on-site water quality features would be required as a condition of Project approval. The Project would not result in substantial erosion or loss of top soil during long-term operation. Implementation of the Project would result in a less than significant impact.

VII-c) **Less-than-Significant Impact.** The Project's geotechnical report (*Technical Appendix F*) indicates that the site's settlement potential would be attenuated through the proposed removal of existing undocumented fill soils and a portion of the near-surface native alluvial soils from within the proposed building area and replace these materials with compacted structural fill. The native soils that will remain in place below the recommended depth of over-excavation will not be subject to large stress increases from the foundation of the proposed building. In addition, the Project's geotechnical report contains recommendations to ensure that grading and construction activities do not compromise the caps on two backfilled oily sludge beds that are located in the southeastern portion of the site. Therefore, following implementation of recommended grading and construction practices, post-construction settlements are anticipated to be within acceptable limits (SoCalGeo, 2019, pp. 1-2, 12-14). In accordance with Chapter 83.04.020 of the County's Municipal Code, the County will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in the Project's geotechnical report to ensure that on-site soils can support the Project. Accordingly, the Project would not locate new development on a geologic unit that is unstable or that would become unstable due to the Project. Implementation of the Project would result in a less-than-significant impact.

As discussed in the responses to Thresholds VII.a (iii) and (iv), development of the property with the Project would result in less-than-significant impacts involving ground failure, including liquefaction and no impacts involving landslides.

VII-d) **Less-than-Significant Impact.** As determined by SoCalGeo, the near-surface on-site soils consist of sand and silty sand, which possess a very low to non-expansive potential (SoCalGeo, 2019, p. 12). Accordingly, no design considerations related to expansive soils are warranted for the Project site. The Project would not create substantial direct or indirect risks to life or property due to unstable geologic units. Implementation of the Project would result in a less-than-significant impact.

VII-e) No Impact. The Project does not propose the use of septic tanks or alternative waste water disposal systems. Implementation of the Project would result in no impact.

VII-f) Less-than-Significant Impact with Mitigation. Brian F. Smith & Associates, Inc. (BFSA) prepared a *Paleontological Assessment*, (*Technical Appendix G*) for the Project to determine the Project site's potential to contain paleontological resources. No known fossil localities were identified from within the Project site boundaries; however, the Project site is underlain at depth (10 feet or more below the ground surface) by old alluvial fan deposits that have a high sensitivity for paleontological resources (based on the presence of geologic formations or mappable rock units where fossils have been discovered elsewhere in the Inland Empire). (BFSA, 2019b, p. 5) Much of the site within the boundary of the former wastewater treatment plant was previously disturbed at depth through the construction of the various tanks and underground utility lines. Regardless, in the event that Project-related excavation and grading activities occur at depths at or greater than 10 feet below the existing ground surface, the potential for Project construction activities to destroy unknown, unique paleontological resources that may be buried beneath the ground surface would be a significant impact and mitigation is required.

The Project would implement mitigation measures MM-GEO-1 through MM-GEO-4 to ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities associated with implementation of the proposed Project. With the implementation of MM-GEO-1 through MM-GEO-4, potential impacts to paleontological resources during Project construction would be reduced to less-than-significant levels.

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 less-than-significant level:

MM GEO-1 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to the County of San Bernardino that a qualified paleontologist (herein "Project Paleontologist") has been retained to conduct paleontological monitoring during mass grading and excavation activities.

MM GEO-2 The Project Paleontologist shall conduct monitoring full-time in areas where of grading or excavation activities occur in undisturbed exposures of alluvial fan deposits at a depth of 10 feet below the existing ground surface and below. Periodic spot checks (1 to 2 visits per week) shall be performed in areas where grading or excavation activities range from 5 to 10 feet below the existing ground surface. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced or eliminated if the Project Paleontologist determines after

examination that the subsurface deposits on the Project site have a low potential to contain or yield fossils.

MM GEO-3 Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum, is required for significant discoveries.

MM GEO-4 A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and written repository agreements, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the County of San Bernardino prior to the issuance of a certificate of occupancy.

ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSION				
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?	☐	☐	☒	☐

Urban Crossroads prepared a *Greenhouse Gas Analysis* for the Project 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/MND and its findings are incorporated into the analysis presented herein.

VIII-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.

Pursuant to and in compliance with Section 15183.5 of the CEQA Guidelines, 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 $MTCO_2e$ 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, 2020d, p. 48) By extension, if the Project were to: 1) emit less than 3,000 $MTCO_2e$ per year; or 2) emit more than 3,000 $MTCO_2e$ per year but achieve the 100-point minimum score on

the Greenhouse Gas Reduction Plan screening table or reduce emissions by 31% from 2007 emissions, the Project would be determined to have a less-than-significant environmental impact from GHG emissions.

As shown in Table VII, the Project will result in approximately 2,372.23 $MTCO_2e$ per year, which is less than the screening threshold of 3,000 $MTCO_2e$. Because the Project's total annual GHG emissions would not exceed 3,000 $MTCO_2e$, the Project would not generate substantial GHG emissions – either directly or indirectly – that would have a significant impact on the environment. Implementation of the Project would result in a less-than-significant impact.

Table VII Project-Related Greenhouse Gas Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	19.99	0.00	0.00	20.08
Area Source	0.01	4.00e-05	0.00	0.01
Energy Source	597.61	0.02	6.08e-03	599.99
Mobile Sources (Passenger Cars)	370.01	0.01	0.00	370.26
Mobile Sources (Truck)	1,040.36	0.04	0.00	1,041.27
On-Site Equipment	50.83	0.02	0.00	51.24
Waste	31.54	1.86	0.00	78.15
Water Usage	170.74	1.25	0.03	211.21
Total CO_2e (All Sources)	**2,372.23**			
SCAQMD Screening Threshold (CO_2e)	**3,000**			
Threshold Exceeded?	**NO**			

Source: (Urban Crossroads, 2020d, Table 3-6)

VIII-b) Less-than-Significant Impact. The Project would comply with several regulations, policies, plans, and policy goals that would reduce GHG emissions, including Title 24 California Building Standards Code (CBSC), Assembly Bill 32 (AB 32), and Senate Bill 32 (SB 32), which are regulations particularly applicable to the Project.

The Project 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 goods movement 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 allowing incorporating new energy efficiency technologies and methods (the next update will take effect on January 1, 2020). The Project would be required to comply with all applicable provisions of the CBSC in effect at the

time of Project construction. 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 during from energy consumption. The Project has no potential to be inconsistent with the mandatory regulations of the CBSC.

CARB identified measures in the 2008 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 2008 Scoping Plan would not conflict with AB 32's mandate to reduce state GHG emissions. CARB also prepared the 2017 Scoping Plan Update to identify the measures that would achieve the emissions reductions goals of SB 32. As explained in point-by-point detail Section 3.8 of *Technical Appendix H* (refer to Tables 3-7 and 3-8) , the Project would not conflict with applicable measures of the 2008 Scoping Plan or the 2017 Scoping Plan Update and would not preclude/obstruct implementation of the Scoping Plan or Scoping Plan Update (Urban Crossroads, 2020d, pp. 49-57).

In April 2015, former Governor Edmund Brown Jr. signed Executive Order (EO) B-30-15, which advocated for a statewide GHG-reduction target of 40 percent below the year 1990 levels by 2030 and 80 percent below 1990 levels by 2050. In September 2016, former Governor Brown signed Senate Bill (SB) 32. SB 32 formally established a statewide goal to reduce GHG emissions to 40 percent below the 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 (i.e., CARB Scoping Plan), is on track to meet the years 2020 and 2030 reduction targets established by AB 32 and SB 32, respectively. 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. (Urban Crossroads, 2020d, p. 28)

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 more than three decades into the future; no agency with GHG subject matter expertise has adopted regulations to achieve these statewide goals 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.

As described above, the Project would not conflict with the State's ability to achieve the State-wide GHG reduction mandates and would be consistent with applicable policies and plans related to GHG

emissions reductions. Implementation of the Project would not actively interfere with any future federally- State, or locally-mandated retrofit obligations enacted or promulgated to legally require development projects to assist in meeting State-adopted GHG emissions reduction targets, including those established under Executive Order S-3-05, Executive Order B-30-15, or SB 32. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Implementation of the Project would result in a less-than-significant impact.

No significant adverse environmental 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. 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 or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires	☐	☐	☐	☒

A Phase I Environmental Site Assessment (ESA) was prepared by RPS Group to determine the presence/absence of hazards and hazardous materials on the Project site. This report is included as *Appendix I* to this Initial Study/MND and its findings are incorporated in the analysis presented herein.

IX-a) Less-than-Significant Impact.

Impacts Associated with Existing Site Conditions

The Project site is located in an area characterized by heavy industrial uses. The approximately eastern half of the Project site was developed in 1942 and operated as a wastewater treatment plant for the adjacent Kaiser Steel Mill. The wastewater treatment plan ceased operation in 2016. No industrial wastewaters were processed on this portion of the Project site; however, starting in 1957, waste sludge from the Kaiser Steel Mill was deposited in two oily sludge beds located in the southeastern portion of the Project site. The oily sludge beds were excavated and removed from the site, then backfilled and covered with an asphalt and concrete cap, in accordance with a remedial action plan that was executed between the California Department of Toxic Substances Control (DTSC) and the former land owner of the site. Pursuant to the remedial action plan, a deed restriction was placed on the Project site precluding the site from future development of residential uses, a hospital, school, or day care center. The land use proposed by the Project – warehouse – would be consistent with the deed restriction that is applied to the Project site and the Project would not alter, modify, or impact the cap that overlies the former location of the oily sludge beds. The remedial action plan that was implemented for the Project site was sufficient to remediate any hazards to the public or the environment from the oily sludge beds; no additional site remediation is needed. RPS Group did not observe any conditions on the eastern half of the Project site or uncover any historical records of past hazardous materials releases on the Project site or in the Project site's vicinity that would adversely affect the Project. (RPS Group, 2019, pp. 11-29)

The approximate western half of the Project site was operated as a ferrous chloride manufacturing facility by Chemwest Industries from prior to 1971 until approximately 1985. Chemwest operated five ferrous chloride ponds on the Project site, two of which had a history of releases in 1973 and 1983. The site was closed and remediated including dismantling and disposing of old liners from five surface impoundments, excavation and disposal of 7,000 tons of soil affected by the leaking surface impoundments, and removal of one aboveground storage tank (AST). The remediation of the site was performed under the supervision and to the satisfaction of the California DTSC; no additional site remediation is needed. RPS Group did not observe any conditions on the western half of the Project site or uncover any historical records of past hazardous materials releases on the Project site or in the Project site's vicinity that would adversely affect the Project. (RPS Group, 2019, pp. 11-29)

Impacts Associated with Project Construction Activities

Heavy equipment (e.g., dozers, excavators, tractors, cranes) would be operated on the Project site during construction of the proposed Project. This heavy equipment may be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are 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 what would occur on any other similar construction site. Construction contractors shall 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 Environmental Protection Agency (EPA), Department of Toxic Substance Control (DTSC), Santa Ana Regional Water Quality Control Basin (RWQCB), Fontana Fire Protection District, and County of San Bernardino. With mandatory compliance with applicable hazardous materials regulations, construction of the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. Implementation of the Project would result in a less-than-significant impact.

Impacts Associated with Project 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 require 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, and to prepare a Hazardous Materials Business Emergency Plan (HMBEP). An 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.

With mandatory regulatory compliance, the Project would not 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. Based on the foregoing information, potential hazardous materials impacts associated with long-term operation of the Project are regarded as less than significant and no mitigation is required.

IX-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 the response to Threshold IX-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.

IX-c) **No Impact.** No existing schools are located within one-quarter mile of the Project site. The nearest school to the Project site is the Live Oak Elementary School located at 9522 Live Oak Avenue, approximately 1.72 miles east of the Project site (Google Earth, 2019). Accordingly, the proposed Project has no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within one-quarter mile of an existing or proposed school.

As described above under the analysis for Thresholds "a" and "b," the transport of hazardous substances or materials to-and-from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations to preclude substantial public safety hazards. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with the routine transport of hazardous substances or materials to-and-from the Project site. Thus, no impact would occur and no mitigation is required.

IX-d) **Less-than-Significant Impact.** The Project site appears on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 as a result of former operations at the Project site. Specifically, the Project site is identified as a non-operating hazardous waste facility and as part of a larger grouping of properties associated with the former Kaiser Steel Mill that are subject to a post closure permit that undergoes ongoing observation and maintenance. (DTSC, 2019a; DTSC, 2019b; DTSC, 2019c) The information compiled by the California DTSC confirms the research findings and site observations collected by RPS Group (as described in the response to Threshold IX-a). RPS Group concluded that implementation of the Project would not expose people or the environment to adverse effects related to hazardous materials or hazardous materials releases (RPS Group, 2019, pp. 11-29). Implementation of the Project would result in a less-than-significant impact.

IX-e) **Less than Significant Impact**. The Project site is located within the airport influence area (AIA) of the Ontario International Airport (ONT). The Project site is located within a portion of the ONT AIA that does not impose any land use or design restrictions and building heights are permitted to exceed 200 feet. Furthermore, the Project site is not located within any Safety Zone, Noise Impact Zone, or Airspace Protection Zone for the ONT. (City of Ontario, 2010; Policy Maps 2-1 to 2-5; Google Earth Pro). Accordingly, implementation of the Project would not result in a safety hazard for people living or working on the Project area and impacts would be less than significant.

IX-f) **No Impact.** The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route (Project Application Materials, 2019). During construction and long-term operation, the proposed Project would be required to maintain adequate emergency access for emergency vehicles. As part of the Project's application review process, the County of San Bernardino reviewed the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project site and that the Project would not substantially impede emergency response times in the local area. Accordingly, implementation of the 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.

IX-g) **No Impact.** The Project site is not located within a State Responsibility Area or a very high fire hazard severity zone. The Project site and surrounding areas generally consist of developed properties, which are generally not associated with wildland fire hazards (CalFire, 2007; Google Earth, 2019). Accordingly, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Implementation of the Project would result in no impact.

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

A *Preliminary Hydrology Report* and *Preliminary Water Quality Management Plan* reports were prepared for the Project by Huitt-Zollars, Inc. The *Preliminary Hydrology Report* identifies drainage patterns and off-site flow tributary to the Project site, as well as evaluating post-development runoff conditions. The hydraulic

calculations are intended to be used to design the Project's storm drain system. The purpose of the *PWQMP* is to help identify pollutants of concern for the Project, establish Best Management Practices (BMPs) for the Project to minimize the release of pollutants of concern, and establish long term maintenance responsibilities for the Project's water quality management features. These reports are included as *Appendices J and K*, respectively, to this Initial Study/MND and their findings are incorporated into the analysis presented herein.

X-a) Less-than-Significant Impact.

Construction-Related Water Quality Impacts

Construction of the Project would involve demolition/site preparation, grading, paving, utility installation, building construction, and landscaping activities, which have the potential to generate water quality pollutants such as silt, debris, organic waste, and chemicals (e.g., paints, solvents). Should these materials come into contact with water that reaches the groundwater table or flows off-site to a public storm drain, the potential exists for the Project's construction activities to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and County of San Bernardino (Development Code Chapter 85.11 and Code of Ordinances Section 35.0101 et seq.), the Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one (1) acre of total land area. In addition, the Project Applicant 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 Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP will specify the Best Management Practices (BMPs) that the Project's construction contractors would be required to implement during construction activities to ensure that potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. 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

Storm water pollutants that may be produced during Project operation include pathogens (bacterial/virus), phosphorous, nitrogen, sediment, metals, oil/grease, trash/debris, pesticides/herbicides, and other organic compounds (Huitt-Zollars, 2020, pp. 2-3)

To meet the requirements of the County's NPDES permit and in accordance with the County of San Bernardino Code of Ordinance (Section 35.0101 et seq.), the Project Applicant would be required to prepare and implement a Water Quality Management Plan (WQMP). A WQMP is a site-specific post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via BMPs. Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. The Project's Preliminary WQMP (PWQMP), prepared by Huitt-Zollars, is attached hereto as *Technical Appendix J*. As identified in *Technical Appendix J*, the Project is designed to include structural source control BMPs consisting of a subsurface infiltration chamber and inlet filters as well as operational source control BMPs, including but not limited to: the installation of water-efficient landscape irrigation systems, storm drain system stenciling and signage, and implementation of a trash and waste storage areas – to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged into the County's public storm drain system (Huitt-Zollars, 2020). Compliance with the PWQMP would be required as a condition of approval for the Project. Long-term maintenance of on-site water quality features also would be required as a condition of approval to ensure the long-term effectiveness of all on-site water quality features.

Additionally, the NDPES program requires certain land uses, including the industrial land uses 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. The Project Applicant would 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 a detailed accounting of all operational activities and procedures, and the Project's building users and their operational characteristics are not known at this time, details of the operational SWPPP (including BMPs) or potential exemption to the SWPPP operational activities requirement cannot be determined with certainty at this time. However, based on the performance requirements of the NPDES Industrial General Permit, it is reasonably assured that the Project's mandatory compliance with all applicable water quality regulations would further reduce potential water quality impacts during long-term operation.

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

X-b) **Less-than-Significant Impact.** The Project would be served with potable water from the Fontana Water Company, and the Project Applicant does not propose the use of any wells or other groundwater extraction activities. Therefore, the Project would not directly draw water from the groundwater table. Accordingly, implementation of the proposed Project would not directly deplete or decrease 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 Project site, which would, in turn, reduce the amount of water percolating down into the underground aquifer that underlies the Project site and surrounding areas (i.e., Chino Groundwater Basin). However, a majority of the groundwater recharge in the Chino Groundwater Basin occurs in the northern and western portions of the Basin, within percolation basins (also known as "recharge basins") (CBWM, 2017, Exhibit 4-4). The Project site is located in the central portion of the Chino groundwater basin and would not physically impact any of the major groundwater recharge facilities in the Basin and, therefore, would not result in substantial, adverse effects to local groundwater levels. Additionally, the Project includes design features that would maximize the percolation of on-site storm water runoff into the groundwater basin, such as underground infiltration chambers and permeable landscape areas. Accordingly, buildout of the Project with these design features would not interfere substantially with groundwater recharge of the Chino groundwater basin. Impacts would be less than significant.

X-c) **i. Less than Significant Impact.** The Project would alter existing ground contours of the Project site and install impervious surfaces, which would result in changes to the site's existing, internal drainage patterns. 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 – either during construction or during long-term operation – as described under the response to Threshold XII-b and X(a). Accordingly, implementation of the Project would result in a less than significant impact.

ii. Less-than-Significant Impact. Although proposed grading and development activities would alter the internal drainage patterns of the Project site, the Project would retain the subject property's existing discharge point along the site's southwestern boundary. (Under existing conditions, stormwater runoff sheet flows across the Project site and ultimately discharges to an existing private storm drain pipe located at the southwestern corner of the site; this channel carries runoff downstream.) The private storm drain line that would receive stormwater runoff from the Project site is a master-planned facility (Line F) that was designed to capture and safely convey stormwater post-development runoff flows generated within the Project site and the adjacent Kaiser Commerce Center Specific Plan area. The stormwater runoff flows that would be generated by the Project are consistent with the design volumes anticipated for the Project site and would not exceed planned levels or the available capacity of the Kaiser Commerce Center storm drain system. Accordingly, implementation of the Project would not result in the generation of unplanned storm water runoff flows that would exceed the existing capacity of downstream stormwater conveyance infrastructure or result in flooding. (Huitt-Zollars, 2019)

As part of the Project, a segment of Line F of the Kaiser Commerce Center Specific Plan master storm drain plan that abuts the Project site would be replaced with a larger pipe segment to correct an error that was made at the time the slag pit to the south of the site was capped. When the slag pit was capped, stormwater runoff flows from an approximately 13-acre portion of the pit were erroneously diverted to Line F instead of a different private facility (Line E) within the Kaiser Commerce Center

Specific Plan area. Pursuant to the Kaiser Commerce Center Specific Plan master storm drain plan, Lines E and F confluence downstream of the Project site while still within the Specific Plan area, so the erroneous diversion of flows from Line E to Line F did not increase storm water runoff volumes within the Specific Plan area above design volumes, other than affecting the available capacity of a segment of Line F. With the improvement proposed as part of the Project, Line F – and the overall master storm drain plan for the Kaiser Commerce Center Specific Plan – would operate as originally envisioned by the Specific Plan and downstream runoff volumes would not exceed original design volumes. (Huitt-Zollars, 2019)

iii. Less than Significant Impact. As discussed in the response to Threshold X-(c)(ii), implementation of the Project would not create or contribute runoff that would exceed the capacity of any existing or planned stormwater drainage system. Also, as discussed under the response to Threshold X-a, the Project's construction contractors would be required to comply with a SWPPP and the Project's owner or operator would be required to comply with the Preliminary WQMP (*Appendix J)* to ensure that Project-related construction activities and operational activities do not result in substantial amounts of polluted runoff. Impacts would be less than significant.

iv. No Impact. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06071C8634J (Panel 8634 of 9400), the Project site is not located within a special flood hazard area (FEMA, 2014). Accordingly, development on the Project site would have no potential to place housing, or other structures, within a 100-year floodplain or impede or redirect flood flows within a 100-year floodplain. No impact would occur.

X-d) **No Impact.** The Pacific Ocean is located more than 45 miles southwest of the Project site; consequently, there is no potential for the Project site to be impacted by a tsunami because tsunamis typically can only reach up to a few miles inland. The site also is not subject to a flood hazard or seiche zone because the nearest large bodies of surface water are approximately 16 miles south of the Project site (Lake Mathews) and approximately 23 miles southeast of the Project site (Lake Perris), respectively, which are both too far away from the subject property to impact the property with a flood hazard or seiche. (Google Earth, 2019) Accordingly, the Project would not risk release of pollutants due to inundation. No impact would occur.

X-e) **Less than Significant Impact.** As discussed in response to Threshold X-a, above, the Project site is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* by preparing and adhering to a SWPPP and WQMP. Implementation of the Project would not conflict with or obstruct the *Santa Ana River Basin Water Quality Control Plan* and impacts would be less than significant.

The entire Project site is located within the Chino Groundwater Basin, which is an adjudicated basin (DWR, 2019). Adjudicated basins are exempt from the 2014 Sustainable Groundwater Management

Act (SGMA) because such basins already operate under a court-ordered water management plan to ensure their long-term sustainability. No component of the Project would obstruct with or prevent implementation of the management plan for the Chino Groundwater Basin. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

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

XI-a) **No impact**. 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 property to the north of the Project site is physically separated from the site by San Bernardino Avenue and the property to the south of the Project site is separated by existing barriers (e.g., chain link fencing) (Google Earth, 2019). The properties to the west and east of the Project site are developed as warehouses; therefore, the Project would serve as an extension of the existing development patterns in the area. Implementation of the Project would result in no impact.

XI-b) **No Impact.** The Project site is designated for IR land uses by the County of San Bernardino General Plan Land Use Zoning Districts Map (San Bernardino County, 2009). The Project provides for the re-development of the subject property as a warehouse distribution facility in accordance with its underlying General Plan land use and in conformance with all applicable policies in the General Plan. Accordingly, the Project would not conflict with the General Plan. The Project otherwise would not conflict with any goals, objectives, policies, or regulations of land use and planning documents applicable to the Project area, including the SCAQMD *AQMP*, SCAG *RTP/SCS*, and/or SCAG *Regional Comprehensive Plan*. Implementation of the Project would result in no impact.

No significant adverse environmental 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. 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?	☐	☐	☐	☒

XII-a) No Impact. The California DOC designates Project site as Mineral Resource Zone 3 (MRZ-3), which corresponds to areas containing mineral deposits for which the significance cannot be determined from available data (DOC, 1995a; DOC, 1995b, p. iv). Accordingly, the Project site is not located within an area known to be underlain by regionally-important mineral resources. In addition, the Project site is not identified as a locally-important mineral resource recovery site in the County of San Bernardino General Plan (San Bernardino County, 2014). Accordingly, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or to the residents of the State of California.

XII-b) No impact. Refer to the response for Threshold XII.a, above.

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

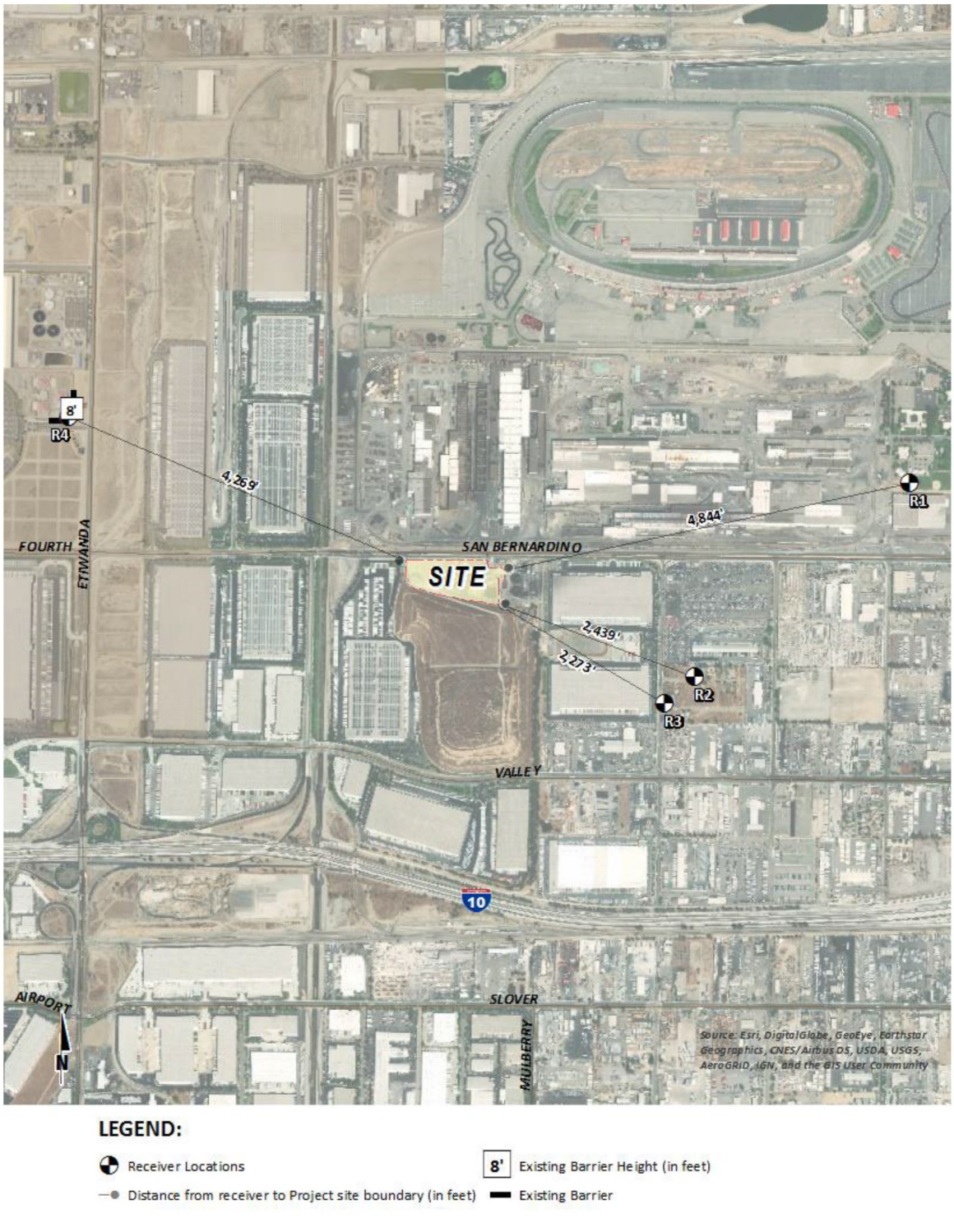
ENVIRONMENTAL ISSUE AREAS EXAMINED	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
XIII. NOISE				
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise level in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

A *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/MND and its findings are incorporated into the analysis presented herein.

XIII-a) Less-than-Significant Impact. 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 associated with the Project is addressed on the following pages.

Construction Noise Impact Analysis

Construction activities on the Project site would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels. Daytime construction noise levels at sensitive receptor locations nearest to the Project site are summarized in Table VIII, *Project Construction Noise Levels (Daytime)*. Receptor locations are shown on Figure 12, *Noise Receiver Locations*. The receptor locations include existing homes in the Project vicinity and are representative of existing sensitive receptors nearest the Project site. It is not necessary to study every single receiver location near the Project's construction area because receivers located at a similar distance from Project construction activities with similar ground elevations, orientation, and intervening physical conditions as the four (4) modeled receptor locations would experience the same or very similar noise effects as those disclosed herein.



Source(s): Urban Crossroads (11-20-2019)

Figure 12

Not to Scale

Noise Receiver Locations

Table VIII Project Construction Noise Levels (Daytime)

Receiver Location[1]	Highest Project Construction Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels	Combined Project and Ambient[4]	Temporary Worst-Case Project Contribution	Threshold Exceeded?[5]
R1	33.7	L1	57.6	57.6	0.0	No
R2	39.6	L2	64.5	64.5	0.0	No
R3	40.2	L3	53.5	53.7	0.2	No
R4	34.8	L4	73.1	73.1	0.0	No

[1]Noise receiver locations are shown on Figure 12.
[2]Highest unmitigated Project construction noise levels as shown on Table 10-8 of *Technical Appendix L*.
[3]Ambient noise level measurement locations as shown on Exhibit 5-A of *Technical Appendix L*.
[4]Represents the combined ambient conditions plus the Project construction activities.
[5]Would noise levels exceed 85 dBA Leq or increase ambient noise levels by 12 dBA Leq or more?
Source: (Urban Crossroads, 2019a, Table 10-10)

As shown in Table VIII, peak daytime construction noise levels would range from 33.7 to 40.2 dBA Leq at sensitive receptor locations nearest the Project site. Pursuant to Section 83.01.080(g)(3) of the County of San Bernardino Development Code, construction noise that occurs during daytime hours – defined as 7:00am to 7:00pm, excluding Sundays and federal holidays – is exempt from the noise limits specified in the Development Code. Because Project-related construction activities are expected to occur on weekdays (and, potentially, on Saturdays) during daylight hours, Project construction would not exceed the standards established by the County of San Bernardino Development Code.

Because the County's Development Code does not establish numerical construction noise thresholds for construction activities that occur during the hours permitted by the County of San Bernardino Development Code, for the purposes of analyzing the significance of construction noise under CEQA, the National Institute for Occupational Safety and Health (NIOSH) construction noise standard for permissible exposure over an eight hour workday of 85 dBA is used as the significance threshold for Project daytime construction activities. Additionally, Project daytime construction activities would be considered to result in a substantial adverse contribution to the existing noise environment if construction contributed 12 dBA Leq or more to ambient levels (as recommended by Caltrans in their Traffic Noise Analysis Protocol). As shown in Table VIII, peak daytime construction activities on the Project site would not generate more than 40.2 dBA Leq and would contribute no more than 0.2 dBA Leq to the existing ambient noise environment. In both cases, Project construction would not exceed the health protective standard for noise exposures established by NIOSH or Caltrans' recommended standard for substantial adverse noise level increases.

There is the potential that specific Project construction activities (i.e., concrete pouring) could occur outside of the construction hours permitted by right in the Development Code. In the event that construction activities occur during nighttime hours (between 7:00pm and 7:00am), a significant

impact would occur if sensitive receptors were exposed to noise levels that exceed 45 dBA Leq (Urban Crossroads, 2019a, p. 19). Nighttime noise levels expected from Project construction are summarized in Table IX, *Project Construction Noise Levels (Nighttime)*. Table IX illustrates that nighttime construction activities on the Project site would not expose any nearby sensitive receptors to noise levels that exceed 38.4 dBA Leq and, therefore, would not exceed the nighttime standard established by the County of San Bernardino Development Code for sensitive uses.

Table IX Project Construction Noise Levels (Nighttime)

Receiver Location[1]	Nighttime Concrete Pour Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels	Combined Project and Ambient[4]	Temporary Worst-Case Project Contribution	Threshold Exceeded?[5]
R1	31.8	L1	56.5	56.5	0.0	No
R2	37.8	L2	64.4	64.4	0.0	No
R3	38.4	L3	51.9	52.1	0.2	No
R4	32.9	L4	71.4	71.4	0.0	No

[1]Noise receiver locations are shown on Figure 12.
[2]Highest unmitigated Project construction noise levels as shown on Table 10-6 of *Technical Appendix L*.
[3]Ambient noise level measurement locations as shown on Exhibit 5-A of *Technical Appendix L*.
[4]Represents the combined ambient conditions plus the Project construction activities.
[5]Would noise levels exceed 85 dBA Leq or increase ambient noise levels by 12 dBA Leq or more?
Source: (Urban Crossroads, 2019a, Table 10-11)

Operational Noise Impact Analysis – Stationary Noise

Stationary (on-site) noise sources associated with long-term Project operation are expected to include idling trucks, delivery truck and automobile parking, delivery truck backup alarms, refrigerated truck containers or reefers roof-top air conditioning units, as well as noise associated with the loading and unloading of dry goods. The daytime and nighttime stationary noise levels associated with Project operation at nearby sensitive receptor locations (the same receptor locations used for the construction analysis, above) are summarized in Table X, *Project Stationary Noise Levels*.

According to County Development Code Section 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. 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}).

Table X Project Stationary Noise Levels

Receiver Location[1]	Land Use	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	**Residential**	**55**	**55**	**60**	**65**	**70**	**75**	**-**
Nighttime		**45**	**45**	**50**	**55**	**60**	**65**	**-**
R1	Residential	23.6	20.6	23.4	27.7	31.5	36.9	No
R2	Residential	28.8	25.8	28.6	32.9	36.7	42.0	No
R3	Residential	29.3	26.3	29.1	33.4	37.2	42.5	No
R4	Residential	24.8	21.8	24.5	28.9	32.7	38.0	No

[1]Noise receiver locations are shown on Figure 12.
[2] Estimated Project operational noise levels as shown on Table 9-2 of *Technical Appendix L*.
[3] Do the estimated Project operational noise levels meet the operational noise level standards from the County of San Bernardino Development Code?
"E. Avg." = Logarithmic (energy) average
Source: (Urban Crossroads, 2019a, Table 10-11)

As shown in Table X, operations on the Project site would not exceed the applicable County of San Bernardino noise standards at any sensitive receptor location. Accordingly, implementation of the Project would not result in the exposure of nearby sensitive receivers to unacceptable daytime or nighttime noise levels; Project-related impacts would be less than significant.

Operational Noise Impact Analysis – Traffic Noise

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

- Existing: This scenario refers to the existing traffic noise conditions without and with the proposed Project.
- Project Opening Year (2020): This scenario refers to the background noise conditions in the year 2020 without and with the Project, including reasonably foreseeable cumulative development projects.

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.

The County of San Bernardino has not established noise standards for traffic-related noise; therefore, for purposes of this CEQA analysis, standards from the Federal Interagency Committee on Noise (FICON) are used to evaluate the significance of Project-related traffic noise. 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. Adjacent to non-noise sensitive uses, a significant impact would occur if the Project results in a 5 dBA or greater increase when the ambient noise environment is 65 dBA CNEL or less or if the Project results in a 3 dBA or greater increase where the ambient noise environment exceeds 65 dBA CNEL. (Urban Crossroads, 2019a, pp. 17-18)

Table XI, *Existing Plus Project Traffic Noise*, 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. Under Existing plus Project conditions, noise levels along roadway segments within the Project study area would increase between 0.0 to 0.1 dBA CNEL, which would not exceed the applicable significance thresholds. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.

Table XI Existing Plus Project Traffic Noise

ID	Road	Segment	Adjacent Planned (Existing) Land Use[1]	CNEL at Adjacent Land Use (dBA)[2]			Noise-Sensitive Land Use?	Off-Site Traffic Noise Threshold[3]	Threshold Exceeded?
				No Project	With Project	Project Addition			
1	San Bernardino Av.	w/o Private Dwy. 1	Kaiser Commerce Specific Plan	79.4	79.4	0.0	No	3.0	No
2	San Bernardino Av.	w/o Prologis Dr.	Regional Industrial	79.3	79.3	0.0	No	3.0	No
3	San Bernardino Av.	e/o Prologis Dr.	Regional Industrial	79.3	79.3	0.0	No	3.0	No
4	San Bernardino Av.	e/o Private Dwy. 4	Regional Industrial	79.3	79.4	0.1	No	3.0	No

[1] Sources: County of San Bernardino Fontana FH29 A Area Plan.
[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] Refer to Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2019a, Table 7-5)

Table XII, *Opening Year Traffic Noise*, 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. Under Existing plus Project conditions, noise levels along roadway segments within the Project study area would increase between 0.0 to 0.1 dBA CNEL, which would not exceed the applicable significance thresholds. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.

Table XII Opening Year Traffic Noise

ID	Road	Segment	Adjacent Planned (Existing) Land Use[1]	CNEL at Adjacent Land Use (dBA)[2]			Noise-Sensitive Land Use?	Off-Site Traffic Noise Threshold[3]	Threshold Exceeded?
				No Project	With Project	Project Addition			
1	San Bernardino Av.	w/o Private Dwy. 1	Kaiser Commerce Specific Plan	79.4	79.5	0.1	No	3.0	No
2	San Bernardino Av.	w/o Prologis Dr.	Regional Industrial	79.4	79.4	0.0	No	3.0	No
3	San Bernardino Av.	e/o Prologis Dr.	Regional Industrial	78.9	78.9	0.0	No	3.0	No
4	San Bernardino Av.	e/o Private Dwy. 4	Regional Industrial	78.9	79.0	0.1	No	3.0	No

[1] Sources: County of San Bernardino Fontana FH29 A Area Plan.
[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] Refer to Section 4 of *Technical Appendix L*.
Source: (Urban Crossroads, 2019a, Table 7-6)

XIII-b) Less-than-Significant Impact. Construction activities on the Project site would utilize construction equipment that has the potential to generate vibration. Project construction-related vibration levels were calculated at the four receiver locations shown on Figure 12 (the same receiver locations used on the Project construction noise analysis). At the modeled receiver locations, Project construction activities would result in vibration levels of 0.0 inches per second peak particle velocity (in/sec PPV), which is less than the County's standard of 0.2 in/sec PPV (per Section 83.01.090 of the Development Code). (Urban Crossroads, 2019a, pp. 55-56) Accordingly, Project construction would not generate temporary, excessive groundborne vibration or noise levels and a less-than-significant impact would occur.

Under long-term conditions, expected operational activities at the Project site would not include or require equipment, facilities, or activities that would result in perceptible ground-borne vibration. Trucks would travel to and from the Project site on surrounding roadways; however, vibration and groundborne noise levels for heavy trucks operating at the posted speed limits on smooth, paved surfaces – as is expected on the Project site and surrounding roadways – typically approach 0.004 in/sec PPV, which is substantially lower than the applicable significance threshold (0.2 in/sec PPV). (Urban Crossroads, 2019a, p. 42) Accordingly, Project operation would not generate excessive groundborne vibration or groundborne noise levels and impacts would be less than significant.

XIII-c) Less-than-Significant Impact. The Project site is not located within a noise impact zone for the ONT, which means the Project site would be exposed to less than 60 dBA CNEL from airport flight operations. Pursuant to Table 2-3 of the ONT Airport Land Use Compatibility Plan (ALUCP), all industrial land uses, which encompass the warehouse building proposed by the Project, are compatible uses outside of the 60 dBA CNEL noise contour with no sound attenuation needed. (City of Ontario, 2011, Map 2-3, Table 2-3) Accordingly, the Project would be a compatible use adjacent to the ONT and operation of the Project would not expose people working on the Project site to excessive noise levels. Implementation of the Project would result in a less-than-significant impact.

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

XIV-a) No Impact. The Project does not include the development of any residential uses and, therefore, would not result in a direct increase in the residential population in the County. The Project would redevelop the site in accordance with the existing underlying land use designation for the site (IR [Regional Industrial]). As such, the Project would not result in growth that was not already anticipated by the County of San Bernardino's General Plan and evaluated by the County's General Plan Final EIR. Furthermore, the Project site is served by existing public roadways, and utility infrastructure is already installed beneath public rights of way adjacent to the property and the Project would not require any roadway or infrastructure improvements other than those required to solely serve the Project site. Because the Project would connect to existing utility infrastructure and would not create excess infrastructure capacity (which could remove a barrier to unplanned growth), the Project would not indirectly induce substantial population growth. Implementation of the Project would result in no impact.

XIV-b) No Impact. Under existing conditions, the Project site does not contain any housing and no people live on the Project site. Therefore, the Project would not displace substantial numbers of existing housing or people and would not necessitate the construction of replacement housing elsewhere. Implementation of the Project would result in no impact.

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

XV-a) **i. Less-than-Significant Impact.** Under existing conditions, the Project receives fire protection services from the Fontana Fire Protection District (FFPD). The FFPD would continue to provide fire protection services to the Project site upon buildout of the Project. The County of San Bernardino forwarded the Project's application materials to the FFPD for review and comment. The FFPD has not indicated to the County that the Project would not be adequately served by fire protection services or that incremental increase in the demand for FFPD services would result in or require new or expanded fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Furthermore, the Project's land use is consistent with the County of San Bernardino General Plan Land Use Zoning Districts Map and, therefore, would not conflict with or preclude implementation of the FFPD's Strategic Plan, which provides for the future construction of a new fire station (Fire Station 80) in close proximity to the Project site (along San Bernardino Avenue, west of Commerce Drive).

Although the Project would not result in the need for new or expanded fire protection facilities, as a standard condition of approval, the Project Applicant would be required to pay fire facility impact fees as required by the FFPD. The County will collect the fire facility impact fee for the Project based on building square footage. The Project's payment of fire facility impact fees, as well as increased property tax revenues that would result from development of the Project, would be used by the County and FFPD to help pay for fire protection services and other public services.

The Project would incorporate fire prevention and fire suppression design features to minimize the potential demand placed on the FFPD. The proposed buildings would be of concrete tilt-up

construction. Concrete is non-flammable and concrete tilt-up buildings have a lower fire hazard risk than typical wood-frame construction. The Project also would install fire hydrants on-site – the County reviewed the Project's site plan to ensure proper spacing of hydrants on-site to provide adequate coverage – and would provide paved primary and secondary emergency access to the Project site to support the FFPD in the event fire suppression activities are needed on-site. Lastly, the proposed warehouse buildings would feature a fire alarm system and ceiling-mounted sprinklers.

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.

ii. Less-than-Significant Impact. Under existing conditions, the Project receives police protection services from the San Bernardino County Sheriff's Department. The Sheriff's Department would continue to provide police protection services to the Project site upon buildout of the Project. The Project site, which formerly operated as a wastewater treatment plant for the adjacent Kaiser Steel Mill, historically has received police protection services for its employees and guests. Although redevelopment of the site with a new warehouse building would increase the number of employees and visitors on the Project site above historic levels, the incremental increase in demand for police protection services is not anticipated to require or result in the construction of a new or physically altered police facility. 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.

iii. Less-than-Significant Impact. The Project does not include residential land uses and would not directly introduce new school-age children within the Cucamonga School District (CSD) and/or Chaffey Joint Union High School District (CJUHSD) boundaries. As discussed in detail in the response to Threshold XIV-a, the Project is not expected to draw a substantial number of new residents to the surrounding area as the result of unplanned population or housing growth and would not, therefore, indirectly increase unplanned enrollment at CSD or CJUHSD schools. Because the Project would not directly generate students and is not expected to indirectly draw students to the area, the Project would not cause or contribute a need to construct new or physically alter existing public-school facilities. Although implementation of the Project would not create a direct demand for public school services, the Project Applicant would be required to contribute development impact fees to the CSD and CJUHSD in compliance with the Leroy F. Green School Facilities Act of 1998, which allows school districts to collect fees from new development 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. Implementation of the Project would result in less-than-significant impacts to public schools.

iv. 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. In addition, 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, the Project would not result in environmental effects related to the construction or expansion of recreational facilities or the increased use or substantial physical deterioration of an existing neighborhood or regional park. Implementation of the Project would result in no impact.

v. No Impact. The Project is not expected to result in a demand for other public facilities/ services, including libraries, community recreation centers, post officers, public health facilities, and/ or animal shelters. Implementation of the Project would result in no impact.

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

XVI-a) No impact. The Project would redevelop the subject property with one (1) warehouse building. 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, the implementation of the proposed would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. Implementation of the Project would result in no impact.

XVI-b) No impact. The Project does not involve the construction of 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 environmental 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
XVII. TRANSPORTATION				
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☐	☒

A *Traffic Impact Analysis, Supplemental Traffic Impact Analysis*, and *Vehicle Miles Traveled Assessment* were prepared for the Project by Urban Crossroads to quantify the effects of Project-related traffic, identify potential circulation system deficiencies that may result from the development of the proposed Project, and recommend improvements to achieve acceptable circulation system operational conditions. These reports are included as *Technical Appendices M*, *N*, and *O* to this Initial Study/MND and their findings are incorporated into the analysis presented herein.

XVII-a) Less than Significant Impact. The analysis provided under this Threshold is based on the information presented in the Project's *Traffic Impact Analysis* (see *Technical Appendix M*). The *Traffic Impact Analysis* was prepared under the assumption that the Project would be occupied by general warehousing businesses. However, during the course of the Project's CEQA review, the Applicant determined that the building may also support occupants that utilize refrigerated/freezer storage (up to 20% of the building floor area could be used for refrigerated/freezer storage). According to the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th edition), the daily and peak hour traffic generation rates vary slightly between "Warehousing" (ITE Code 150) and "High-Cube Cold Storage Warehouse" (ITE Code 157) land uses. The Project's traffic engineer, Urban Crossroads, determined that the analysis scenario used in the *Traffic Impact Analysis* – the assumption that 100% of the building would support "Warehousing" land uses – would result in more peak hour traffic than a scenario where 80% of the building was occupied by "Warehousing" land uses and 20% of the building was occupied by "High-Cube Cold Storage Warehouse" land uses. (It should be noted that the 100% "Warehousing" scenario evaluated in the *Traffic Impact Analysis* would result in a very slight increase in total vehicle trips per day – by 14 trips – compared to the current Project scenario with the mix of "Warehousing" and "High-Cube Cold Storage Warehouse" land uses.) (Urban Crossroads, 2020e, pp. 5-6) Because the County of San Bernardino evaluates the performance of the circulation

system based on peak traffic conditions (pursuant to their *Transportation Impact Study Guidelines*), the analysis provided in the *Traffic Impact Analysis* remains valid and is utilized in this IS/MND because it overstates the Project's actual peak hour traffic contributions to the local circulation network and, thus, presents a conservative, "worst-case" analysis of potential Project impacts.

Local Circulation System Performance

Study Area

The Project's traffic impact study area (hereafter "Project study area" or "study area") was based on the County of San Bernardino's *Transportation Impact Study Guidelines* and in consultation with County staff. The study area includes the intersections include:

- Private Driveway (Driveway 1) & San Bernardino Avenue (off-site);
- Prologis Drive & San Bernardino Avenue (off-site);
- Prologis Drive & Western Project Driveway (Driveway 2A/2B) (on-site);
- Prologis Drive & Private Driveway (Driveway 3) (off-site); and
- Eastern Project Driveway (Driveway 4) & San Bernardino Avenue (on-site).

Existing traffic counts were collected in the study area in February 2019 during representative, typical weekday peak hour traffic conditions. No observations were made in the field during the traffic count collection period that would indicate atypical traffic conditions. Based on the collected traffic counts, all intersections in the Project study area operate at a level of service (LOS) of "C" or better during the AM and PM peak hours (7:00-9:00am and 4:00-6:00pm, respectively). (Urban Crossroads, 2019b, pp. 23, 27-28) Refer to *Technical Appendix M* (see Section 3) for more information about existing traffic conditions in the Project's study area.

Thresholds of Significance

For purpose of evaluation herein, the Project would conflict with County of San Bernardino transportation policies and thus result in a significant adverse impact if any of the following situations occur (Urban Crossroads, 2019b, pp. 17-18):

- 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.

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 ITE for

"Warehousing" land uses (ITE Land Use Code 150), the Project is calculated to generate approximately 288 daily vehicle trips, including 28 trips during the AM peak hour and 31 trips during the PM peak hour (Urban Crossroads, 2019b, p. 33)

Of the Project's estimated 288 daily vehicle trips, 58 would be from trucks with two or more axles. 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. 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 estimated to produce an estimated 376 daily PCE trips, including 36 PCE trips during the AM peak hour and 41 PCE trips during the PM peak hour. (Urban Crossroads, 2019b, p. 33) The Project's PCE vehicle trips were used for purposes of evaluating the Project's traffic analysis.

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 13, *Project Passenger Car Trip Distribution*, and Figure 14, *Project Truck Trip Distribution*.

The assignment of traffic from the Project area 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 15, *Project Average Daily Traffic*.

Analysis Scenarios

The Project's potential impacts were assessed for each of the following conditions:

- Near-Term Construction;
- Existing (2019) plus Project; and
- Opening Year (2020).

Source(s): Urban Crossroads (08-29-2019)

Figure 13

Not to Scale

Project Passenger Car Trip Distribution

LEGEND:

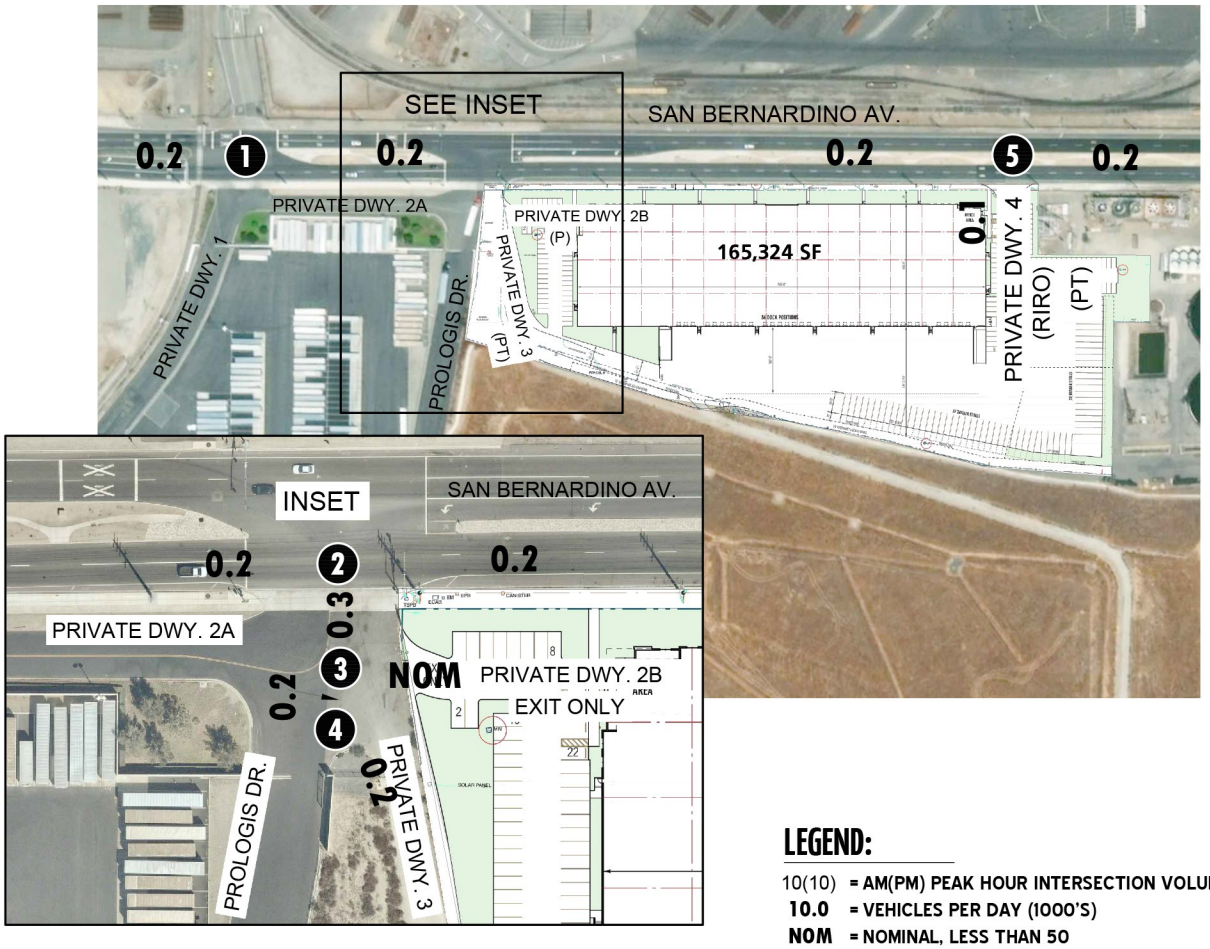
10 = PERCENT TO/FROM PROJECT
= OUTBOUND
= INBOUND

Source(s): Urban Crossroads (08-29-2019)

Figure 14

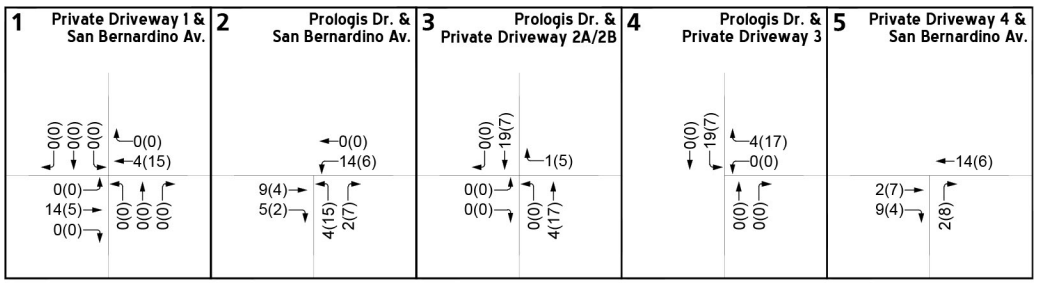
Not to Scale

Project Truck Trip Distribution



LEGEND:

10(10) = AM(PM) PEAK HOUR INTERSECTION VOLUMES
10.0 = VEHICLES PER DAY (1000'S)
NOM = NOMINAL, LESS THAN 50 VEHICLES PER DAY



Source(s): Urban Crossroads (08-29-2019)

Figure 15

Not to Scale

Project Average Daily Traffic

The Near-Term Construction conditions analysis determines the potential for the Project's construction traffic to result in a conflict with local transportation policies. 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 (2019) plus Project (E+P) analysis determines direct Project-related traffic impacts that would occur 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 (2019) and estimated Project occupancy (2020) 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 necessarily reflect the environment that will exist when the Project is constructed and becomes operational. Regardless, the E+P scenario is evaluated to satisfy CEQA requirements to identify the Project's impacts to the existing environment.

The Opening Year (2020) analysis includes an evaluation of traffic conditions at the Project's "opening year." The Opening Year (2020) analysis is utilized to determine the potential for Project traffic to cumulatively contribute to near-term circulation system deficiencies upon consideration of existing traffic + ambient growth + Project traffic + traffic from cumulative development projects.

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 Project's construction phase, traffic to-and-from the subject property would be generated by construction employee trips, delivery of construction materials, and use of heavy equipment. Construction employee traffic would be substantially less than daily and peak hour traffic volumes generated during Project operational activities. Construction activities typically begin/end outside of the peak hour; therefore, most (if not all) construction employees would not be driving to/from the Project site during hours of peak congestion. Because construction worker trips would be substantially less than the Project's operational trips, which are shown below to have a less-than-significant impact (see "Impact Analysis for Existing plus Project Traffic Conditions," below), traffic from construction workers is not expected to result in a substantial adverse effect to the local roadway system. 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 and the total volumes of trips would be less than the Project's operational trips, which are shown below to have a less-than-significant impact. 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. Based on the foregoing information, 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 traffic conditions are summarized in Table XIII, *E+P Intersection Analysis*. As shown in Table XIII, Project traffic would not exceed applicable significance thresholds under E+P traffic conditions. Accordingly, implementation of the Project would result in a less-than-significant impact under E+P traffic conditions.

Table XIII E+P Intersection Analysis

#	Intersection	Traffic Control[3]	Existing (2019)				E+P			
			Delay[1] (secs.)		LOS[3]		Delay[1] (secs.)		LOS[3]	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Private Driveway 1 & San Bernardino Av.	CSS	18.8	23.2	C	C	18.9	23.4	C	C
2	Prologis Dr. & San Bernardino Av.	TS	4.8	4.5	A	A	5.8	6.2	A	A
3	Prologis Dr. & Private Driveway 2A/2B	CSS	8.3	0.0	A	A	8.5	8.5	A	A
4	Prologis Dr. & Private Driveway 3	**CSS**	Future Intersection				8.5	8.4	A	A
5	Private Driveway 4 & San Bernardino Av.	**CSS**	Future Intersection				9.6	14.6	A	B

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.
[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; CSS = Cross-Street Stop; **CSS** = Improvement
Source: (Urban Crossroads, 2019b, Table 5-1)

Impact Analysis for Opening Year (2020) Traffic Conditions

Study area intersection levels of service for Opening Year traffic conditions are summarized in Table XIV, *Opening Year Intersection Analysis*. As shown in Table XIV, Project traffic would not exceed applicable significance thresholds under Opening Year traffic conditions. Accordingly, implementation of the Project would result in a less-than-significant impact under Opening Year traffic conditions.

Table XIV Opening Year Intersection Analysis

#	Intersection	Traffic Control[3]	2020 Without Project				2020 With Project			
			Delay[1] (secs.)		LOS[3]		Delay[1] (secs.)		LOS[3]	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Private Driveway 1 & San Bernardino Av.	CSS	19.2	24.0	C	C	19.4	24.1	C	C
2	Prologis Dr. & San Bernardino Av.	TS	4.8	4.5	A	A	5.8	6.3	A	A
3	Prologis Dr. & Private Driveway 2A/2B	CSS	8.3	0.0	A	A	8.5	8.5	A	A
4	Prologis Dr. & Private Driveway 3	**CSS**	Future Intersection				8.5	8.4	A	A
5	Private Driveway 4 & San Bernardino Av.	**CSS**	Future Intersection				9.7	14.9	A	B

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.
[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; CSS = Cross-Street Stop; **CSS** = Improvement
Source: (Urban Crossroads, 2019b, Table 6-1)

San Bernardino County Congestion Management Plan

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 (SANBAG, 2016, Figure 2-1).

The Project would contribute fewer than 50 two-way peak hour trips to the two nearest freeways to the Project site, Interstate 10 (I-10) and Interstate 15 (I-15), which are part of the *CMP* roadway network (Urban Crossroads, 2019b, p. 37). 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-10 and I-15 mainline segments and impacts to these freeway facilities would be less than significant.

Although the Project would not contribute substantial traffic to I-10 and I-15, 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, including but not limited to *San Bernardino County CMP* segments of SR-60, I-15, and I-10, as well as freeway segments located outside of San Bernardino County, such as I-5, I-15, I-110, I-405, and I-710, among others. 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.

Public and Non-Vehicular Transportation

The Project would develop the subject property with 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.

Under existing conditions, a sidewalk abuts the Project site frontage and, according to the *San Bernardino County Non-Motorized Transportation Plan*, a Class II (striped) bikeway is planned on San Bernardino Avenue abutting the Project site. (SBCTA, 2018, Figure 5.57) The Project would be required to comply with all applicable County engineering design standards to ensure compatibility with existing bike lanes and sidewalks. In addition, the Project does not include any element that would prevent the implementation of or preclude the use of the existing or planned bike and pedestrian facilities in the Project site vicinity, including those along the Project site's frontage with San Bernardino Avenue. Further, the Project would include bicycle storage for at least six bicycles.

Bus Route 61 operates along San Bernardino Avenue but there are no bus stops adjacent to the Project site, the nearest stops are located approximately 0.2-mile west and 0.3-mile east of the site, respectively. There are no components of the Project that would interfere with the ability of Route 61 to utilize San Bernardino Avenue or that would modify/affect any stop for Route 61. Accordingly, implementation of the Project would 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.

XVII-b) Less-than-Significant Impact. The Project's *Vehicle Miles Traveled Assessment* was prepared following the methodology and guidelines established in the County of San Bernardino's *Transportation Impact Study Guidelines*. Pursuant to the *Transportation Impact Study Guidelines*, employment-generating uses would result in substantial vehicle miles traveled (VMT) if VMT from employees traveling between their homes and their employment sites (home-based work trip) exceeded 4-percent below the areawide VMT baseline. According to calculations performed using the San Bernardino County Transportation Analysis Model (SBTAM), the VMT baseline for the Project area is 19.63 for each home-based work trip; thus, the threshold of significance for the Project would be 18.85 VMT (i.e., 4-percent below the areawide baseline). The average trip length for passenger car trips is 13.16 miles in the Project site's traffic analysis zone. As disclosed on the preceding pages, the Project is estimated to generate 232 passenger car trips per day which correlates to approximately 3,053 daily VMT (13.16 miles traveled x 232 daily trips = 3,053). To calculate the Project's VMT for home-based work trips, the Project' daily VMT (3,053) is divided by its expected number of employees (166); the resulting value is 18.39 VMT for each home-based work trip. The

Project's VMT for each home-based work trip is approximately 6-percent below the areawide baseline, which would be consistent with the County's VMT standard of a minimum 4-percent reduction below the areawide baseline. (Urban Crossroads, 2020f) Accordingly, implementation of the Project would not generate excessive VMT and, therefore, would not conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

XVII-c) Less-than-Significant Impact. The types of traffic generated during operation of the Project (i.e., passenger cars and trucks) would be compatible with the type of traffic observed along Project study area roadways under existing conditions. In addition, all proposed improvements within the public right-of-way would be installed in conformance with County design standards. The County reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced through implementation of the Project. Accordingly, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Implementation of the Project would result in a less-than-significant impact.

XVII-d) No 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. 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. Implementation of the Project would result in no impact.

No significant adverse environmental 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
XVIII. TRIBAL CULTURAL RESOURCES				
a) 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:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☒

XVIII-a) i. No Impact. BFSA performed a pedestrian field survey of the Project site to determine if there were any features on the Project site eligible for listing on a historic register and performed an archival records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton in order to identify any previously recorded archaeological sites within the Project site boundaries or in the immediate vicinity. Additionally, BFSA requested a review of Sacred Lands Files (SLFs) by the Native American Heritage Commission (NAHC). No tribal cultural resources were observed on the Project site, which has been long utilized for industrial land uses, no tribal cultural resources were previously recorded on the Project site or in the immediate area, and the SLF review was negative. (BFSA, 2019a, pp. iv, 1.0-14-1.0-16) Accordingly, implementation of the Project would not impact a tribal cultural resource eligible for listing on a historic register.

XVIII-a) ii. Less than Significant Impact with Mitigation Incorporated. Assembly Bill (AB) 52 took effect on July 1, 2015. AB 52 requires a lead agency to make best efforts to avoid, preserve, and protect tribal cultural resources.

Prior to the release of the CEQA document for a project, AB 52 requires the lead agency to initiate consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested

the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects located in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.

Tribal consultation request letters were sent on August 31, 2019, to eight (8) tribes that have been identified as having ancestral territory in the Project area, or that have specifically requested notification of all projects in development in the County. Those tribes include the San Manuel Band of Mission Indians (SBMI), Morongo Band of Mission Indians, Gabrieleno Band of Mission Indians, San Gabriel Band of Mission Indians, Fort Mojave Indian Tribe, Colorado River Indian Tribe (CRIT), Soboba Band of Luiseno Indians, and Twenty-Nine Palms Band of Mission Indians. Response letters/emails were received from four (4) of the tribes including SBMI, Gabrieleno Band of Mission Indians, Morongo, and Twenty-Nine Palms.

The Gabrieleno Band of Mission Indians was the only tribe to request formal consultation. Consultation took place on November 14, 2019. Concerns for disturbance of culturally significant finds were minimal because the Project site contains several feet of fill material that was not native to the site. However, should grading extend below the depths of on-site artificial fill materials, the Gabrieleno Band of Mission Indians did acknowledge the potential for tribal cultural resource discoveries. Accordingly, the Gabrieleno Band of Mission Indians did request that mitigation and monitoring measures that would safeguard any discoveries of tribal cultural resources be incorporated into the Project and these measures are provided as MMs TCR-1 through TCR-5.

Twenty-Nine Palms did not have concerns regarding the Project and the Morongo tribe deferred to SBMI. SBMI did not request formal consultation but sent correspondence stating that the Project exists within Serrano ancestral territory and, therefore, is of interest to the tribe. However, due to the disturbed nature of the location, SBMI did not have any concerns with the Project's implementation as planned. Notwithstanding, SMBMI requested that that mitigation and monitoring measures that would safeguard any discoveries of tribal cultural resources be incorporated into the Project and these measures are provided as MMs TCR-1 through TCR-5.

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 less-than-significant level:

MM TCR-1 **Treatment Measures for Human Remains/Funerary Objects:** Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains.

If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The MLD Tribe will make every effort to keep the remains in situ and protected, and the landowner/applicant shall make every effort to comply with these recommendations. If the project cannot be diverted, it may be determined that burials will be removed. The MLD Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the MLD Tribe, documentation shall be taken that includes, at minimum, detailed descriptive notes and sketches. Additional types of documentation shall only occur once approved by the MLD Tribe for data recovery purposes. Cremations will either be removed in bulk or by any means necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the MLD Tribe and the NAHC. The Tribes do NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects that requires data recovery will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the MLD Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

MM TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease within the immediate vicinity of the find (60-foot buffer) until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist, the tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation, and a member of the San Manuel Band of Mission Indians Cultural Resources Department. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or reburial on-site, though will recommend data recovery for educational purposes if other options are exhausted. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource”, time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.

MM TCR-3 **Public Resources Code Sections 21083.2(b):** For unique archaeological resources preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All analysis proposals will be reviewed and approved by the consulting Tribes. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials within the County, if such an institution agrees to accept the material. If no institution accepts the archaeological material that is not Native American in origin, they shall be offered to the Gabrieleño Band of Mission Indians-Kizh Nation or a local school or historical society in the area for educational purposes.

MM TCR-4 **Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. 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, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed. More details on this process can be found in CR-2.

MM TCR-5 **Professional Standards:** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

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

XIX-a) Less-than-Significant Impact. Connections to the existing infrastructure/utility networks are available in the Project area and any off-site improvements would occur within improved rights-of-way and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. The environmental impacts associated with the installation of proposed utility line connections are part of the Project's construction phase and are evaluated throughout this Initial Study/MND accordingly. In any instance where a significant impact has been identified for the Project's construction phase, a mitigation measure is recommended to reduce impacts to less-than-significant levels. The construction of utility lines necessary to serve the 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/MND. Implementation of the Project would result in a less-than-significant impact.

XIX-b) Less-than-Significant Impact. The Fontana Water Company (FWC) is responsible for supplying potable water to its service area, which includes the Project site. As discussed in the adopted 2015 FWC Urban Water Management Plan (UWMP) (Amended December 2017), adequate water supplies are projected to be available to meet the FWC's estimated water demand through 2040 under normal, historic single-dry, and historic-multiple dry year conditions (FWC, 2017, pp. 7-5 to 7-7). The FWC's forecasts for projected water demand are based on growth projections prepared by the SCAG, which rely on the adopted land use plans that cover the FWC's geographic service area. Because the Project would be consistent with the County's General Plan land use designation for the site, the water demand associated with the Project has been considered in the demand anticipated by the FWC's 2015 UWMP and analyzed therein. As stated above, the FWC anticipates to have adequate water supplies to meet all its demands until at least 2040; therefore, the FWC has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlement are required. Implementation of the Project would result in a less-than-significant impact.

XIX-c) Less-than-Significant Impact. The Project is estimated to generate 22,000 gallons per day (gpd) of wastewater (2,200 gpd/acre x 10 acres = 22,000 gpd). Wastewater generated by the Project would be treated at IEUA's RP-1 or RP-4 wastewater treatment plants. Under existing conditions, RP-1 has an excess treatment capacity of approximately 16 million gallons per day and RP-4 has an excess capacity of approximately 4 million gallons per day (IEUA, 2019). Accordingly, implementation of the Project would utilize approximately 0.1% ([22,000 gpd ÷ 16 million gpd] × 100 = 0.1%) of the excess daily treatment capacity at RP-1or approximately 0.6% ([22,000 gpd ÷ 4 million gpd] × 100 = 0.6). Both RP-1 and RP-4 have sufficient excess 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 facilities. Implementation of the Project would result in less-than-significant impacts.

XIX-d) Less-than-Significant Impact. Implementation of the Project would create solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. Solid waste generated by the Project would be disposed of at the Mid-Valley Landfill. The Mid-Valley Landfill is permitted to accept a maximum of 7,500 tons of solid waste per day. In June 2019, the most recent time for which disposal data was publicly available, the Mid-Valley Landfill received an average of 4,600 tons of waste per day, which is approximately 61.3% 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, 2019)

Construction Impact Analysis

Approximately 200,132 s.f. of on-site structures and asphalt will be demolished during Project construction. Using the United States Environmental Protection Agency's (U.S. EPA) non-residential demolition waste factor of 158 pounds per square foot, on-site demolition activities would generate approximately 15,810 tons of debris ([200,132 s.f. x 158 lbs/s.f.] ÷ 2,000 lbs/ton = 15,810 tons) (EPA, 2009). The County of San Bernardino requires that all newly constructed buildings develop a

construction waste management plan and divert a minimum of 65% of construction waste from landfills (by recycling, reusing, and other waste reduction strategies) (San Bernardino County, n.d.). Accordingly, the Project is estimated to generate approximately 5,534 tons of construction demolition waste.

Project construction would generate solid waste requiring disposal, primarily consisting of discarded demolition materials and packaging. Based on the size of the Project (i.e., 165,324 s.f. building) and the U.S. EPA construction waste generation factor of 4.34 pounds per s.f. for non-residential uses, approximately 262 tons of waste is expected to be generated during the Project's construction phase ([165,324 s.f. x 4.34 pounds per s.f.] / 2,000 pounds per ton = ~ 359 tons) (EPA, 2009). The County of San Bernardino requires that all newly constructed buildings develop a construction waste management plan and divert a minimum of 65% of construction waste from landfills (by recycling, reusing, and other waste reduction strategies) (San Bernardino County, n.d.); therefore, Project construction is estimated to generate approximately 180 tons of solid waste requiring landfilling.

The Project's combined demolition and construction activities would generate approximately 5,714 tons of solid waste requiring disposal at a landfill. The Project's construction phase is estimated to last for approximately 300 days; therefore, Project demolition and construction is estimated to generate approximately 19 tons of solid waste per day requiring disposal.

Non-recyclable construction waste generated by the Project would be disposed of at the Mid-Valley Landfill. As described above, the Mid-Valley Landfill receives well below its maximum permitted daily disposal volume; thus, the relatively small volume of daily construction waste generated during Project construction is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, Mid-Valley Landfill is not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The Mid-Valley Landfill has sufficient daily capacity to accept solid waste generated by the Project's construction phase. Implementation of the Project would result in a less-than-significant impact.

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 1.2 tons of solid waste per day ([1.42 pounds / 100 s.f.] x 165,324 s.f.] / 2,000 pounds = ~ 1.2 tons). Under existing conditions, the abandoned wastewater treatment facility does not generate any solid waste. Implementation of the Project would result in an approximately 1.2-ton net increase in solid waste generation. Although implementation of the Project would increase the amount of solid waste generated at the Project site, the Project's projected solid waste would be below Mid-Valley Landfill's maximum permitted daily disposal volume. Additionally, 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 approximately 0.6 ton of solid waste per day requiring landfilling (1.2 tons/day x 0.5 = 0.6 ton/day).

Non-recyclable solid waste generated during the long-term operation of the Project would be disposed at the Mid-Valley Landfill. As described above, this landfill receives well below its 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. Implementation of the Project would result in less-than-significant impacts.

XIX-e) 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 County adopted the 1995 Countywide Integrated Waste Management Plan (CIWMP) (Amended 2018). The CIWMP outlines the goals, policies, and programs the County implements to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates.

To assist the County 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 Section 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 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. Implementation of the Project would result in less-than-significant impacts.

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

XX-a-d) No Impact. The State Responsibility Area (SRA) is the land where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership. According to the California Department of Forestry and Fire Protection's (Calfire's) Very High Fire Hazard Severity Zones (VHFHSZ) in SRA, the Project site is not located within an SRA. Additionally, based on a review of Calfire's VHFHSZ in Local Responsibility Area (LRA), the Project site is located within a non-VHFHSZ (CalFire, 2007; CalFire, 2008). Because the Project site is not located in or near an SRA and because the Project site is not located in a high fire hazard area, implementation of the Project would result in no impacts pursuant to Thresholds XX(a) through (d).

No significant adverse environmental 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
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) 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) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

XXI-a) Less-than-Significant Impact 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/MND. Where such impacts were determined to be potentially significant throughout this Initial Study/MND, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. Accordingly, with incorporation of the mitigation measures identified in this Initial Study/MND, implementation of the Project would not substantially degrade the quality of the environment and impacts would be less than significant.

XXI-b) Less-than-Significant Impact with Mitigation. As discussed throughout this Initial Study/MND, implementation of the Project has the potential to result in an effect on 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 on the environment, mitigation measures have been imposed to reduce potential effects to less-than-significant levels.

Aesthetics

Redevelopment of the Project site would change the existing character of the site; however, the land use proposed by the Project is consistent with the industrial character of the Project area. The Project would be required to comply with the development regulation and design standards contained in 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 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 is also a cumulatively considerable effect, while air pollutant emissions below applicable regional and/or localized thresholds are not considered cumulatively considerable. As discussed in the responses to Thresholds III-a through -c, Project-related construction and operational emissions would not exceed any SCAQMD regional or localized emissions threshold for any criteria pollutant. Accordingly, the Project's air quality impacts would not be cumulatively-considerable.

Biological Resources

The Project site and surrounding area have been identified as having the potential to support the burrowing owl; however, the Project site was historically developed with industrial uses and structures and does not contain suitable habitat for the burrowing owl. Notwithstanding, MM-BIO-1 would be imposed on the Project to require a pre-construction survey for the burrowing owl to ensure that unexpected impacts to the species do not occur. The Project site does not support any other sensitive wildlife species or sensitive plant species, riparian, or sensitive natural habitat or federally-protected wetlands. The Project would not have the potential to contribute to a cumulatively-considerable impact on these resources. Implementation of the Project would not result in any cumulatively considerable impacts to biological resources.

Cultural Resources

The Project site does not contain important historic or prehistoric archaeological resources 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 prehistoric archaeological resources, 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 prehistoric resources during ground-disturbing activities. Therefore, the potential for development on the Project site to impact

subsurface prehistoric archaeological resources is a cumulatively considerable impact. Application of MMs CR-1 through MM CR-3 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 applicable energy-efficiency regulations, including 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, with the exception of impacts to paleontological resources, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic. Furthermore, the Project would be required to comply with all 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). The Project area is underlain with alluvial fan deposits that have a high paleontological resource sensitivity. 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. MM-GEO-1 through MM-GEO-4 are imposed to ensure that proper monitoring and recovery protocols are implemented during grading and excavation to ensure that significant impacts to fossils are avoided. After mitigation, the Project would not result in a cumulatively considerable impact to paleontological resources.

Greenhouse Gas Emissions

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 Section 15130(f)). Accordingly, the analysis provided in the responses to Thresholds VIII-a and -b reflects a cumulative impact analysis of the GHG emissions related to the Project and demonstrates that the Project would not result in a cumulatively-considerable impact related to GHG emissions.

Hazards and Hazardous Materials

Potential effects related to hazardous materials are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. The

analysis in this Initial Study/MND identified less-than-significant environmental impacts related to Project site-specific hazards and hazardous materials (refer to responses to Thresholds IX-a through IX-g.

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 nor would the Project would conflict with an applicable land use plan. The Project would not result in a cumulatively-considerable impact.

Mineral Resources

The Project would have no impact on mineral resources. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact.

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 temporary construction noise and construction-related vibration would not occur. Under long-term operating conditions, 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 the response to Threshold XII-a demonstrates that the Project would not result in a cumulatively considerable impact related to transportation noise under long-term operating conditions.

Population and Housing

The Project would implement the land uses planned for the Project site by the San Bernardino County General Plan. The Project would not implement land uses that generate new residents 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 applicable development impact fees, a portion of which would be used by the County to offset the incremental increase in demand of public 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. The Project would not result in cumulatively considerable impacts to public 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

As demonstrated in the analysis for Threshold XVII-a, the Project would not contribute to any cumulatively-considerable adverse effects to the performance of the circulation network as measured against the performance goals established by the County of San Bernardino General Plan and the County's *Transportation Impact Study Guidelines*. Furthermore, the Project would be consistent with its General Plan land use designation – meaning that use of the site for employment-generating land uses was accounted for in SBTAM – and the VMT from Project-related home-based work trips would be less than the County's standard (as demonstrated in the analysis for Threshold XVII-b). Therefore, implementation of the Project would not create unexpected or excessive VMT that could cumulatively contribute to substantial adverse transportation effects. The Project would not result in cumulatively considerable impacts to transportation.

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-5 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.

Wildfire

The Project site is not located in an SRA; therefore, no cumulatively-considerable impacts associated with wildfire would occur due to the development of the Project.

XXI-c) Less-than-Significant Impact. The Project's potential to result in environmental effects that could adversely affect human beings either directly or indirectly – for example, through increased air pollution, water pollution, or traffic congestion – has been discussed throughout this Initial Study. In all instances, the analysis provided in this Initial Study/MND determined that the planning, construction, and operation of the Project would not result in environmental effects that 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/CONDITIONS OF APPROVAL

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

COA-BIO-1: Within 30 days prior to grading, a qualified biologist shall conduct a survey of the Project 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 the CDFW relocation protocol and shall only occur between September 15 and February 1. If a 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 CR-1 **Retain a Native American Monitor/Consultant:** The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant whose ancestral area is disturbed will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities, as defined by the Gabrieleño Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians, may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

MM CR-2 **Human Remains Discovery:** Upon discovery of human remains, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the on-site lead/construction manager, who will then notify the consulting Tribes, the qualified lead archaeologist, and the County coroner, pursuant to the State Health and Safety Code §7050.5, and that code will be enforced for the duration of the project. Work will continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) as mandated by state law who will then appoint a Most Likely Descendent (MLD).

MM CR-3 **Burials and Funerary Remains**: The MLD shall work with the Coroner, NAHC, Landowner, and Lead Agency regarding culturally appropriate practices and recommended next steps in the event that human remains are discovered during ground disturbing activities. The term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

If the San Manuel Band of Mission Indians is designated MLD in accordance with the legal process noted in CR-2, the MLD will work with the Coroner, NAHC, Landowner, and Lead Agency regarding culturally appropriate practices and recommended next steps.

MM GEO-1 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to the County of San Bernardino that a qualified paleontologist (herein "Project Paleontologist") has been retained to conduct paleontological monitoring during mass grading and excavation activities.

MM GEO-2 The Project Paleontologist shall conduct monitoring full-time in areas where of grading or excavation activities occur in undisturbed exposures of alluvial fan deposits at a depth of 10 feet below the existing ground surface and below. Periodic spot checks (1 to 2 visits per week) shall be performed in areas where grading or excavation activities range from 5 to 10 feet below the existing ground surface. The Project Paleontologist shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced or eliminated if the Project Paleontologist determines after examination that the subsurface deposits on the Project site have a low potential to contain or yield fossils.

MM GEO-3 Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum, is required for significant discoveries.

MM GEO-4 A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and written repository agreements, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the County of San Bernardino prior to the issuance of a certificate of occupancy.

MM TCR-1 **Treatment Measures for Human Remains/Funerary Objects:** Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The MLD Tribe will make every effort to keep the remains in situ and protected, and the landowner/applicant shall make every effort to comply with these recommendations. If the project cannot be diverted, it may be determined that burials will be removed. The MLD Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically, and respectfully. If data recovery is approved by the MLD Tribe, documentation shall be taken that includes, at minimum, detailed descriptive notes and sketches. Additional types of documentation shall only occur once approved by the MLD Tribe for data recovery purposes. Cremations will either be removed in bulk or by any means necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the MLD Tribe and the NAHC. The Tribes do NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects that requires data recovery will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the MLD Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

MM TCR-2 **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any tribal cultural or archaeological resources, construction activities shall cease within the immediate vicinity of the find (60-foot buffer) until the find can be assessed. All tribal cultural and archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist, the tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation, and a member of the San Manuel Band of Mission Indians Cultural Resources Department. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation and San Manuel Band of Mission Indians shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request preservation in place or reburial on-site, though will recommend data recovery for educational purposes if other options are exhausted. Work may continue on other parts of the Project while evaluation and, if necessary, additional protective mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources.

MM TCR-3 **Public Resources Code Sections 21083.2(b):** For unique archaeological resources preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All analysis proposals will be reviewed and approved by the consulting Tribes. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials within the County, if such an institution agrees to accept the material. If no institution accepts the archaeological material that is not Native American in origin, they shall be offered to the Gabrieleño Band of Mission Indians-Kizh Nation or a local school or historical society in the area for educational purposes.

MM TCR-4 **Unanticipated Discovery of Human Remains and Associated Funerary Objects:** Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. 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, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed. More details on this process can be found in CR-2.

MM TCR-5 **Professional Standards:** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

PERSONS WHO CONTRIBUTED TO THIS INITIAL STUDY

This Initial Study/MND was prepared by:

County of San Bernardino

Anthony DeLuca, Senior Planner

T&B Planning, Inc.

Tracy Zinn, AICP, President
David Ornelas, Senior Project Manager
Christhida Mrosla, Environmental Analyst
Kimberly Thienes, Environmental Analyst
Cristina Maxey, GIS/Graphics Specialist

REFERENCES

The following information sources were used during the preparation of this Initial Study:

Cited As	Reference
BFSA, 2019a	Brian F. Smith & Associates, Inc. 2019. *Cultural Resources Study for the Kaiser Commerce Center Project*. September 13, 2019.
BFSA, 2019b	Brian F. Smith & Associates, Inc. 2019. *Paleontological Assessment for the Kaiser Commerce Center Project.* August 27, 2019.
CA Legislative Info, 2005	California Legislative Information. 2005. *Public Resources Code 42911*. Web. Accessed December 2, 2019. Available: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode+PRC&sectionNum=42911
CA Legislative Info, 2011	California Legislative Information. 2011. *Assembly Bill 341*. Web. Accessed December 2, 2019. Available: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341
CAL FIRE, 2007	California Department of Forestry and Fire Protection (CAL FIRE). 2007. *San Bernardino County Fire Severity Hazard Map in State Responsibility Area*. Web. Accessed December 2, 2019. Available: https://osfm.fire.ca.gov/media/6781/fhszs_map62.pdf

Cited As	Reference
CAL FIRE, 2008	California Department of Forestry and Fire Protection (CAL FIRE). 2008. *San Bernardino County Fire Severity Hazard Map in Local Responsibility Area*. Web. Accessed December 2, 2019. Available: https://osfm.fire.ca.gov/media/6783/fhszl_map62.pdf
CalRecycle, 2019	California Department of Resources Recycling and Recovery (CalRecycle). 2019. *SWIS Facility Detail Mid-Valley Sanitary Landfill*. Web. Accessed December 2, 2019. Available: https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0055/
Caltrans, 2017	California Department of Transportation (Caltrans). 2017. *Scenic Highways*. Web. Accessed December 2, 2019. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
CBRE, 2018	CBRE. 2018. "The U.S. Supply Chain Quandry: Finding Enough Workers for Expanding I&L Sector." Web. Accessed April 4, 2020. Available: https://www.cbre.us/about/media-center/ie-warehouse-labor
CBWM, 2017	Chino Basin Watermaster. 2017. *Chino Basin Optimum Basin Management Program 2016 State of the Basin Report*. Web. Accessed December 6, 2019. Available: http://www.cbwm.org/docs/engdocs/State_of_the_Basin_Reports/SOB%202016/2016%20State%20of%20the%20Basin%20Report.pdf
City of Ontario, 2011	City of Ontario. 2011. *LA/Ontario International Airport Land Use Compatibility Plan*. Web. Accessed December 6, 2019. Available: http://www.ontarioplan.org/wp-content/uploads/sites/4/pdfs/ALUCP_FULL.pdf
DOC, 1995a	California Department of Conservation (DOC).1995. *Mineral Land Classification of a Part of Southwestern San Bernardino County Map*. Web. Accessed December 6, 2019. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-08/OFR_94-08_West.pdf
DOC, 1995b	California Department of Conservation (DOC).1995. *Mineral Land Classification of a Part of Southwestern San Bernardino County Report*. Web. Accessed December 6, 2019. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-08/OFR_94-08_Text.pdf
DOC, 2016a	California Department of Conservation (DOC). 2016. *San Bernardino County Important Farmland Finder 2014.* March 2016
DOC, 2016a	California Department of Conservation (DOC). 2016. *San Bernardino County Williamson Act FY 2015/2016*. 2016
DTSC, 2019a	California Department of Toxic Substances Control (DTSC). *EnviroStor Kaiser Ventures, Inc. Permitting*. Web. Accessed December 6, 2019. Available:

Cited As	Reference
	https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD008274938&starttab=
DTSC, 2019b	California Department of Toxic Substances Control (DTSC). *EnviroStor Kaiser Ventures, Inc. Summary*. Web. Accessed December 6, 2019. Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80001542
DTSC, 2019c	California Department of Toxic Substances Control (DTSC). *EnviroStor California Steel Industries, Inc. Permitting*. Web. Accessed December 6, 2019. Available: https://www.envirostor.dtsc.ca.gov/public/hwmp_profile_report?global_id=CAD118352921&starttab=
DWR, 2019	California Department of Water Resources (DWR). 2019. *Statewide Map of SGMA 2019 Basin Prioritization Results.* Web. Accessed December 6, 2019. Available: https://data.cnra.ca.gov/dataset/13ebd2d3-4e62-4fee-9342-d7c3ef3e0079/resource/aa480726-e92c-421c-bd7c-3f2ffece1e19/download/sgma_bp_statewide_map.pdf
ELMT, 2019	ELMT Consulting, Inc. 2019. *Burrowing Owl Suitability Assessment for the Proposed Kaiser Commerce Center.* February 4, 2019.
EPA, 2009	Environmental Protection Agency. 2009. *Estimating 2003 Building-Related Construction & Demolition Materials Amounts*. Web. Accessed December 2, 2019. Available: https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf
FEMA, 2014	Federal Emergency Management Agency (FEMA). 2014 *National Flood Hazard Layer FIRMette*. Web. Accessed December 6, 2018. Available: https://p4.msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/nfhlprinttool2_gpserver/j5f0d67b86c9d4326b796ece7a1944100/scratch/FIRMETTE_de357921-1853-11ea-98a8-0050569c218e.pdf
FWC, 2017	Fontana Water Company. 2017. *2015 Urban Water Management Plan*. Web. Accessed December 2, 2019. Available: https://www.fontanawater.com/wp-content/uploads/2018/10/San-Gabriel-Fontana_Amended-Final-December-2017-1.pdf
Google Earth, 2019	Google Earth Pro. 2019.
Huitt-Zollars, 2020	Huitt-Zollars, Inc. 2019. *Preliminary Water Quality Management Plan*. January 3, 2020.

Cited As	Reference
Huitt-Zollars, 2019	Huitt-Zollars, Inc. 2019. *Preliminary Hydrology Report*. December 18, 2019.
IEUA, 2019	Inland Empire Utilities Agency. 2019*. IEUA Regional Plants Map Tour*. Web. Accessed December 2, 2019. Available: gis.maps.arcgis.com/apps/MapTour/index.html?appid=f0b049ae9f9d4caab5967a131202f13d&webmap=59a54ca6c2d440eeb871f570f5fb50cf
RPS Group, 2019	RPS Group. 2019. *Phase I Environmental Site Assessment*. October 2019.
SANBAG, 2016	San Bernardino Associated Governments. 2016. *San Bernardino County Congestion Management Program*. June 2016. Accessed December 5, 2019. Available: https://www.gosbcta.com/wp-content/uploads/2019/10/2016-Congestion-Management-Plan-.pdf
San Bernardino County, 2009	San Bernardino County. 2009. *San Bernardino County Land Use Plan General Plan Land Use Zoning Districts Map*. August 14, 2009
San Bernardino County, 2010	San Bernardino County. 2010. *San Bernardino County Land Use Plan General Plan Geologic Hazards Overlay Map*. Web. Accessed December 2, 2019. Available: from http://www.sbcounty.gov/Uploads/lus/GeoHazMaps/EHFHC_20100309new.pdf
San Bernardino County, 2012	San Bernardino County. 2012. *San Bernardino County Valley/Mountain Region Biotic Resources Map*. Web. Accessed December 2, 2019. Available: http://www.sbcounty.gov/Uploads/lus/BioMaps/vly_mtn_all_biotic_resources_map_final.pdf
San Bernardino County, 2014	San Bernardino County. 2014. *2007 San Bernardino County General Plan (Amended 2014)*. Web. Accessed December 2, 2019. Available: http://www.sbcounty.gov/Uploads/lus/GeneralPlan/FINALGP.pdf
San Bernardino	San Bernardino County. 2019. *San Bernardino County Code of Ordinances*. Web. Accessed December 2, 2019. Available:

Cited As	Reference
County, 2019	http://library.amlegal.com/nxt/gateway.dll/California/sanbernardinocounty_ca/sanbernardinocountycaliforniacodeofordin?f=templates$fn=default.htm$3.0$vid=amlegal:sanbernardinocounty_ca
San Bernardino County, n.d.	San Bernardino County. N.d. *Construction Waste Management Plan*. Web. Accessed December 2, 2019. Available: http://wp.sbcounty.gov/ezop/permits/construction-waste-management-plan-part-1/
SBCTA, 2018	San Bernardino County Transportation Authority (SBCTA). 2018. *San Bernardino County Non-Motorized Transportation Plan March 2011 (Revised June 2018).* Web. Accessed December 6, 2019. Available: https://www.gosbcta.com/wp-content/uploads/2019/10/Non-Motorized-Transportation-Plan-.pdf
SCAQMD, 2005	Southern California Air Quality Management District. 2005. *Rule 403 Fugitive Dust*. Web. Accessed December 2, 2019. Available: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf
SCAQMD, 2015	South Coast Air Quality Management District, 2015b. *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae*. Sierra Club v. County of Fresno and Friant Ranch LP. Web. Accessed December 6, 2019.Available : https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf.
SoCalGeo, 2019	Southern California Geotechnical. 2019. *Geotechnical Investigation Proposed Kaiser Commerce Center*. January 24, 2019.
SWRCB, 2014	State Water Resources Control Board. 2014. *Federal, State, and Local Laws, Policy, and Regulation*. Web. Accessed December 2, 2019. Available: https://www.waterboards.ca.gov/laws_regulations/#ccramd
Urban Crossroads, 2020a	Urban Crossroads, Inc. 2020. *Kaiser Commerce Center Air Quality Impact Analysis*. March 11, 2020.
Urban Crossroads, 2020b	Urban Crossroads, Inc. 2020. *Kaiser Commerce Center Mobile Health Risk Assessment*. March 11, 2020.
Urban Crossroads, 2020c	Urban Crossroads, Inc. 2020. *Kaiser Commerce Center Energy Assessment*. March 11, 2020.

Cited As	Reference
Urban Crossroads, 2020d	Urban Crossroads, Inc. 2020. *Kaiser Commerce Center Project Greenhouse Gas Analysis*. March 11, 2020.
Urban Crossroads, 2020e	Urban Crossroads, Inc. 2020. *Kaiser Commerce Center Warehouse Trip Generation Assessment*. February 27, 2020.
Urban Crossroads, 2019a	Urban Crossroads, Inc. 2019. *Kaiser Commerce Center Noise Impact Analysis*. November 20, 2019
Urban Crossroads, 2019b	Urban Crossroads, Inc. 2019. *Kaiser Commerce Center Traffic Impact Analysis*. August 29, 2019.
USCB, 2012	United States Census Bureau. 2012. *2010 Census – Urbanized Area Reference Map: Riverside – San Bernardino, CA*. Web. Accessed December 2, 2019. Available: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside--san_bernardino_ca/DC10UA75340_002.pdf