

**SAN BERNARDINO COUNTY  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION  
ENVIRONMENTAL CHECKLIST FORM**

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

**PROJECT LABEL:**

**APNs:** 0230-122-19, 0230-132-23,  
0230-132-13, and 0230-132-14

**USGS Quad:** Guasti

**Applicant:** Whittram Avenue Industrial  
Owner, L.P.

**T, R, Section:** T: 1S, R: 6W, S:21

**Location:** 14253, 14315, 14339, & 14343  
Whittram Avenue

**Project No:** PROJ-2020-00217

**Community Plan:** Not applicable

**Rep:** John Atwell, Whittram Avenue  
Industrial Owner, L.P.

**LUZD:** (IR) Regional  
Industrial

**Proposal:** CUP to construct an  
approximately 209,600-square-  
foot warehouse building on  
approximately 10-acre site.

**Overlays:** FP (Flood Plain  
Overlay) Zone

**PROJECT CONTACT INFORMATION:**

**Lead Agency:** County of San Bernardino  
Land Use Services Department  
385 N. Arrowhead Avenue, 1<sup>st</sup> Floor  
San Bernardino, California 92415-0182

**Contact Person:** Steven Valdez, Senior Planner

**Phone No:** (909) 387-4421      **Fax No:** (909) 387-3223

**E-mail:** Steven.Valdez@lus.sbcounty.gov

**Project Sponsor:** Whittram Avenue Industrial Owner, L.P.  
3520 Piedmont Road, NE #100  
Atlanta, Georgia 30305

## **PROJECT DESCRIPTION**

### **Project Site Location, Existing Site Land Uses and Conditions**

The project site is located in the southwestern portion of unincorporated San Bernardino County (County), which is located in southern California. The project site is immediately bounded by Whittram Avenue to the north, light industrial uses to the east and west, and the Burlington Northern Santa Fe railway tracks to the south. Regional access to the project area is provided by State Route 60 to the north, Interstate 15 to the west, and Interstate 10 to the south (Figure 1, Project Location).

The project site is composed of four Assessor's Parcel Numbers (APNs 0230-122-19, 0230-132-23, 0230-132-13, and 0230-132-14) with the street addresses of 14253, 14315, 14339, and 14343 Whittram Avenue (Figure 2, Existing Project Site).

The majority of the approximately 10.02-acre, rectangular project site is vacant, although some remnants of former industrial uses remain on site, including partial concrete foundations, storage/shed structures, auto and construction vehicles in various states of operability, and a residence-based business building. The remainder of the site consists of dirt and gravel surfaces.

As recently as 2017, the project site was fully utilized with industrial uses. These uses include a truck dismantling and heavy equipment repair business, wood recycling business, and scrap metal recycling business (associated with the adjacent Advanced Steel Recovery business). Historically, the project site has been used for heavy industrial purposes since the early 1970s.

### ***Project Summary***

The project would demolish and remove the remaining structures on site and construct a single, one-story industrial/warehouse building, equaling a total of 209,600 square feet (inclusive of office space), on an approximately 10.02-acre site (Figure 3 Site Plan). The proposed industrial/warehouse building would equal 204,600 square feet and the proposed office space would be a total of 5,000 square feet. The project would also include approximately 68,734 square feet of landscape area, parking areas for passenger vehicles and tractor-trailers, and loading docks. Figure 4 provides conceptual elevations of the project.

### ***On-Site Improvements***

The project would include a 25-foot building setback from the sidewalk along Whittram Avenue to the proposed warehouse. Additionally, the eastern, western, and southern sides of the project site would include a 10-foot setback from the boundary line of the project site to the edge of the proposed parking lots. A variety of trees, shrubs, plants, and land covers would be planted in the landscape areas throughout the project site, in conformance with the County's approved plant palette list.

### ***Site Access, Circulation, and Parking***

Access to the project site would be provided by two driveways off Whittram Avenue; the first driveway would be a 40-foot-wide truck driveway at the northwestern corner of the project site, and the other driveway would be a 40-foot-wide truck driveway at the northeastern corner of the

site. The eastern and western portions of the project site would include paved employee parking lots. The southern portion of the project site would include truck court with trailer parking spaces and loading docks. Gated entry to the truck court would be provided on the southeast and southwest sides of the truck court. The project site would include 108 passenger vehicle parking spaces, 30 trailer parking spaces, and 27 tractor-trailer dock high.

### **Stormwater System and Other Utility Improvements**

The project site has been previously developed and is served by existing utilities, including domestic water, natural gas, and electricity. However, in some instances, these present utilities are not adequately sized to serve the project and, thus, would be upgraded/replaced during project construction. As such, lateral water lines would be constructed as part of the project and connect to the existing water line within Whittram Avenue (both contain existing domestic water lines) to provide adequate domestic water service and fire flow. The project would involve the construction of an on-site septic tank to treat wastewater.

As part of the project, a new engineered stormwater drainage system will be constructed on the project site to collect and treat on-site stormwater runoff. On-site stormwater will be collected via a series of inlets and catch basins before being conveyed to on-site underground infiltration basins located throughout the project site. The infiltration basins would allow a certain amount of stormwater to infiltrate into the soils, and excess flows would then flow into the adjacent public storm drain system.

### **Surrounding Land Uses**

#### **Existing Land Use and Land Use Zoning Districts**

<b>Location</b>	<b>Existing Land Use</b>	<b>Land Use Zoning District</b>
<b>Project Site</b>	(GI) General Industrial	(IR) Regional Industrial
North	(LI) Limited Industrial; (MDR) Medium Density Residential 5-20 du/ac	(IC) Community Industrial
South	(GI) General Industrial; (C) Commercial	(IR) Regional Industrial; (SD-COM) Special Development
East	(GI) General Industrial	(IR) Regional Industrial
West	(GI) General Industrial; (LI) Limited Industrial	(IR) Regional Industrial

The General Plan land use designations and zoning districts of the project site and surrounding area are shown in Figure 5, Land Use, and Figure 6, Zoning Districts.

**ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES**

Federal: None.

State of California: None.

County of San Bernardino: Land Use Services Department-Building and Safety, Public Health-Environmental Health Services, Special Districts, and Public Works.

Regional: South Coast Air Quality Management District.

Local: None

**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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, please refer to Section XVIII, Tribal Cultural Resources.

## 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 With Mitigation Incorporated	Less than Significant	No Impact
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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 significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated:** Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact:** Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

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.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below will 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.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION:**

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

<input type="checkbox"/>	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
<input checked="" type="checkbox"/>	Although the proposed project could have a significant effect on the environment, there shall 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 shall be prepared.
<input type="checkbox"/>	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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.

  
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\_ Signature: (prepared by Steven Valdez, Planner)

September 28, 2021  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
\_ Signature:(David Prusch, Supervising Planner)

September 28, 2021  
\_\_\_\_\_  
Date

**I. Aesthetics**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 a 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: (Check  if project is located within the view-shed of any Scenic Route listed in the Policy Plan):

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

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

**Less-than-Significant Impact.** The Countywide Final Program Environmental Impact Report prepared for the San Bernardino Countywide Policy Plan (Policy Plan) (County of San Bernardino 2020a) identifies both the San Gabriel, San Bernardino and the Jurupa Mountains and foothills as visually prominent topographic features that provide a scenic vista from mobile and stationary viewing locations within the Valley Region of the County. The project site is located approximately 7 miles south, 14 miles west, and approximately 4 miles north, respectively, from these scenic resources. Views of the San Gabriel Mountains and Jurupa Hills are mostly obstructed from public viewing areas abutting the project site (i.e., Whittram Avenue) by a combination of existing off-site development and atmospheric haze and smog that is common in the region throughout the year. 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 Whittram Avenue. Additionally, the current viewshed within the project area consists of existing industrial and commercial development. Proposed development on the project site would likely block views of the Jurupa Hills from Whittram Avenue; however, this effect is not considered substantial because views of the hills are almost entirely obstructed by the existing structures on 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.

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

**No Impact.** According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System (Caltrans 2020a), the only officially designated state scenic highway in San Bernardino County is a 16-mile portion of State Route 38 from South Fork Campground to State Lane. This roadway segment is located approximately 38 miles east of the project site in the San Bernardino Mountains. Based on this distance and intervening natural topography and constructed structures, the project site is not located within the viewshed of this officially designated state scenic highway. Additionally, the Policy Plan does not identify officially designated or eligible scenic highways within or adjacent to the Valley Region of the County (County of San Bernardino 2020b). Therefore, no impacts associated with both state scenic highways and local scenic corridors would occur.

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

**Less-than-Significant Impact.** According to the United States Census Bureau, the project site is located within an urban area (U.S. Census Bureau 2021). The project would involve the development of a warehouse use, which is conditionally permitted within the site's IR land use designation and zoning classification.

All properties adjacent to the project site have Policy Plan land use designations and zoning districts for industrial and commercial uses. The project site is currently heavily disturbed by existing development. Implementation of the project would inevitably alter the existing visual character of the project site by demolishing and removing the existing asphalt and structures onsite and developing an industrial/warehouse building with associated improvements, consistent with surrounding land uses in the project area.

Thus, implementation of the project represents a logical continuation of industrial development in this part of the County. The project would incorporate similar architectural elements as other new industrial/warehouse buildings in the surrounding area, including a neutral color palette and a variety of building materials, such as medium reflective panels and windows. All rooftop heating, ventilation, and air conditioning (HVAC) units would be screened by the building parapet and would not be visible from the public right-of-way or

surrounding properties. Parkway and setback landscape areas along the public right-of-way would soften views of the project site and enhance the visual quality of the project.

Additionally, to ensure that both current and future development within the County is designed and constructed to conform to existing visual character and quality of the surrounding built environment, the County's Development Code (County of San Bernardino 2007a) includes design standards pertaining to building size, height, and setback, as well as landscaping, signage, and other visual considerations. These design standards help ensure that adjacent land uses are visually consistent with one another and their surroundings, while reducing the potential for aesthetic conflict. Therefore, long-term impacts associated with the existing visual character and quality would be less than significant.

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

**Less-than-Significant Impact.** Consistent with Chapter 83.07 (Glare and Outdoor Lighting) of the County's Code of Ordinances (County of San Bernardino 2021), 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. All exterior lighting would be shielded/hooded to prevent light trespass onto nearby public right-of-way. Additionally, the project would use a variety of non-reflective building materials, and although some new reflective improvements (i.e., windows and building front treatments) would be introduced onto the project site, the project as a whole would not be considered a source of glare in the project area. Therefore, impacts associated with light and glare would be less than significant.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**II. AGRICULTURE AND FORESTRY RESOURCES**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION: (Check  if project is located in the Important Farmlands Overlay):  
 San Bernardino Countywide Plan Policy Plan, 2020; California Department of Conservation Farmland Mapping and Monitoring Program; Submitted Project Materials

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

**No Impact.** The project site consists of a developed and disturbed property that includes only urbanized land uses with no agricultural uses.

According to aerial photographs of the project site and surrounding area, the project site has been developed since at least 1938, and likely earlier (NETR 2020; note that the oldest available aerial photograph is from 1938). Up until the 1990s, and maybe later, the project site primarily included agricultural and rural residential land uses. Sometime between 1994 and 2005 (note that no aerial photographs taken between these dates are available) the land use and activities on the project site started a shift towards industrial operations. Most of the surrounding properties within the project area are zoned for industrial and special development land uses, and the site is currently surrounded by existing industrial and residential development. Thus, there are no agricultural uses or properties zoned for agricultural use within the vicinity of the project site that could be converted through construction of the project.

According to the California Department of Conservation Important Farmland Finder (CDOC 2020a), the project site is designated as "Urban and Built-Up Land." The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Important Farmland"). The project would not occur within any farmland locations and would not result in the conversion of this land to nonagricultural use.

Therefore, no impacts associated with the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) would occur.

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

**No Impact.** According to the California Department of Conservation Important Farmland Finder (CDOC 2020a), the project site is designated as "Urban and Built-Up Land." The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Important Farmland"). The project would not occur within any farmland locations and would not result in the conversion of this land to nonagricultural use. Additionally, as seen in Policy Map NR-5, Agricultural Resources, there are no Williamson Act contracts on the project site or within the project area (County of San Bernardino 2020b). Therefore, no impacts associated with the conflict with existing zoning for agricultural use, or a Williamson Act contract would occur.

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

**No Impact.** The project site consists of a developed and disturbed property that includes only urbanized land uses with no timberland production uses or zoning for timberland production. Therefore, no impacts associated with timberland or forestland would occur.

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

**No Impact.** The project site consists of a developed and disturbed property that includes only urbanized land uses with no forestland uses. Therefore, no impacts associated with the loss of forest land or conversion of forest land to non-forest use would occur.

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

**No Impact.** According to the California Department of Conservation Important Farmland Finder (CDOC 2020a), the project site is designated as “Urban and Built-Up Land.” The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, “Important Farmland”). The project would not occur within any farmland locations and would not result in the conversion of this land to nonagricultural use. The project site consists of a developed and disturbed property that includes only urbanized land uses with no forestland uses. Therefore, no impacts associated with 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 would occur.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**III. Air Quality**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district might be relied upon to make the following determinations. Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Air Quality and GHG Emissions Attachments (Appendix A)				

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

**Less-than-Significant Impact.** The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region’s ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- **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 of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

**Consistency Criterion No. 1**

This criterion references the second impact criterion, which evaluates the proposed project’s potential impacts in regards to State CEQA Guidelines Appendix G Threshold 2 in Section III (the proposed project’s potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation impact analysis). As discussed

in second criterion, the proposed project would not exceed the SCAQMD significance thresholds. Therefore, the proposed project would not result in an increase in the frequency or severity of existing air quality violations. Therefore, the proposed project would conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

## **Consistency Criterion No. 2**

While striving to achieve the NAAQS for O<sub>3</sub> and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>), and the CAAQS for ozone (O<sub>3</sub>), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), and PM<sub>2.5</sub> through a variety of air quality control measures, the 2016 AQMP also accommodates planned growth in the SCAB. Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; SCAG 2016a), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).<sup>1</sup> The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. The County's General Plan designates the entire project site as Regional Industrial (IR) (County of San Bernardino County 2008). Warehouse projects are allowed within the IR zone and, as such, the proposed project would not require a zoning change or General Plan amendment. The proposed project is consistent with the underlying land use assumed in the SCAG RTP/SCS forecasts and used in the SCAQMD AQMP development.

Because the future tenants are not known yet, the number of jobs that the proposed project would generate cannot be precisely determined but can be estimated. For purposes of this analyses, employment estimates were calculated using average employment density factors reported by SCAG. SCAG reports that for every 2,111 square feet of warehouse space in San Bernardino County, the median number of jobs supported is one employee (SCAG 2001). The project would include approximately 209,600 square feet of flexible industrial space. As such, the estimated number of employees required for operation would be approximately 100 persons.

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<sup>1</sup> Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled (VMT) and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

According to SCAG's 2016 RTP/SCS, the County is expected to have an employment population of 729,000 in 2015 and 1,028,000 in 2040, for an annual growth rate of 11,960 employees. The proposed project would employ 99 persons in 2024. As such, the proposed project's designed employment exceeds the annual growth projections for the County.

### **Summary**

As described previously, the proposed project would not result in an increase in the frequency and severity of existing air quality violations and would not conflict with Consistency Criterion No. 1. The proposed project would also be consistent with the General Plan and growth projections of the SCAG 2016 RTP/SCS. Thus, the proposed project would not conflict with Consistency Criterion No. 2. Therefore, impacts related to the proposed project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

As described previously, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with, or obstruct implementation of, the applicable AQMP would be less than significant.

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

**Less-than-Significant Impact.** Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003a).

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include O<sub>3</sub>, nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>) and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and NO<sub>x</sub>, which are important because they are precursors to O<sub>3</sub>, as well as CO, sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>.

Regarding NAAQS and CAAQS attainment status,<sup>2</sup> the SCAB is designated as a nonattainment area for national and California O<sub>3</sub> and PM<sub>2.5</sub> standards (CARB 2017; EPA

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<sup>2</sup> An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the Environmental Protection Agency and CARB, respectively, for

2017). The SCAB is designated as a nonattainment area for California PM<sub>10</sub> standards; however, it is designated as an attainment area for national PM<sub>10</sub> standards. The SCAB nonattainment status of O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and California NO<sub>2</sub>, CO, and SO<sub>2</sub> standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.<sup>3</sup>

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in April 2019, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2019). The quantitative air quality analysis provided herein applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA. The SCAQMD mass daily construction thresholds are as follows: 75 pounds per day for VOC, 100 pounds per day for NO<sub>x</sub>, 550 pounds per day for CO, 150 pounds per day for SO<sub>x</sub>, 150 pounds per day for PM<sub>10</sub>, and 55 pounds per day for PM<sub>2.5</sub>.

The following discussion quantitatively evaluates project-generated construction impacts and qualitatively evaluates operational impacts that would result from implementation of the proposed project.

### **Short-Term Construction Emissions**

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; the specific type of operation; and, for dust, the prevailing weather corresponding uncertainty in precise ambient air quality impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions for construction of the proposed project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction activities from a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the land use type used to represent the project and size,

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the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

<sup>3</sup> Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

construction schedule, and anticipated construction equipment utilization, were based on information provided by the applicant and default model assumptions when project-specific data was not available.

For purposes of estimating proposed project emissions, and based on information provided by the project applicant, it is assumed that construction of the project would commence in January 2022 and would last approximately 15 months, ending in April 2023. The analysis contained herein is based on the following schedule assumptions (duration of phases is approximate): conditions. Therefore, such emission levels can only be approximately estimated with a Demolition: 20 days

- a) Site Preparation: 10 days
- b) Grading: 20 days
- c) Building Construction: 230 days
- d) Paving: 20 days
- e) Architectural Coating: 30 days

General construction equipment modeling assumptions are provided in Table 1. The equipment mix was generated by CalEEMod. For the analysis, it was generally assumed that heavy-duty construction equipment would be operating at the site five days per week, up to a maximum of eight hours per day. Detailed construction equipment modeling assumptions are provided in Appendix A.

Table 1. Construction Workers, Vendor Trips, and Equipment Use

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
Demolition	16	0	32	Concrete/Industrial Saws	1	8
				Excavators	3	8
				Rubber Tired Dozers	2	8
Site Preparation	18	0	0	Rubber Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	16	0	0	Excavators	1	8
				Grading	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	3	8
Building Construction	180	70	0	Cranes	1	7
				Forklifts	3	8
				Generator Sets	1	8

Table 1. Construction Workers, Vendor Trips, and Equipment Use

Construction Phase	One-Way Vehicle Trips			Equipment		
	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Daily Usage Hours
Paving	16	0	0	Tractors/Loaders/Backhoes	3	7
				Welders	1	8
				Pavers	2	8
				Paving Equipment	2	8
Architectural Coating	36	0	0	Rollers	2	8
				Air Compressors	1	6

**Notes:** See Appendix A for additional details.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. PM<sub>10</sub> and PM<sub>2.5</sub> emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. The proposed project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas two times per day, with additional watering depending on weather conditions.

Estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 2.

Table 2. Estimated Maximum Daily Construction Emissions

Year	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> <sup>a</sup>	PM <sub>2.5</sub> <sup>a</sup>
	pounds per day					
2022	3.25	33.13	24.13	0.06	9.95	6.01
2023	34.72	19.59	23.38	0.06	3.18	1.34
<b>Maximum Daily Emissions</b>	<b>34.72</b>	<b>33.13</b>	<b>24.13</b>	<b>0.06</b>	<b>9.95</b>	<b>6.01</b>
SCAQMD Threshold	75	100	550	150	150	55
<b>Threshold exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Source:** SCAQMD 2019.

**Notes:** VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

See Appendix A for detailed results.

<sup>a</sup> These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403.

As shown in Table 2, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during project construction.

### **Long-Term Operational Emissions**

Operation of the proposed project would generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources, including vehicle trips from customers, employees, and delivery trips; area sources, including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; stationary sources; off-road equipment; and energy sources, including combustion of fuels used for space and water heating and cooking appliances.

On-road vehicular trip generation data provided in the transportation analysis for the proposed project were estimated using a spreadsheet-based model and emission factors from the California Air Resources Board (CARB) EMFAC2017 and U.S. Environmental Protection Agency (EPA) AP-42 factors for paved road dust generation. Vehicle trip lengths were assumed to be 40 miles for truck trips (in accordance with SCAQMD guidance) and the passenger car trip length was assumed to be 16.6 miles (CalEEMod default) for the proposed project. Emission factors representing the vehicle mix and emissions for 2024 were used to estimate emissions associated with vehicular sources for the proposed project. The 2024 operational year represents the first year after build-out and would represent maximum daily operational emissions.

Based on the transportation analysis, the proposed project would generate a total of 365 daily trips; 252 trips would be passenger vehicle (69%) and 113 trips would be heavy-duty trucks (31%). The existing land use was estimated to generate a total of 519 daily trips; 408 trips would be passenger vehicle (79%) and 111 trips would be heavy-duty trucks (21%). The proposed land use was estimated to operate 365 days per year.

CalEEMod was also used to estimate emissions associated with area and energy sources. Area sources include landscape maintenance equipment, consumer products, and architectural coatings for maintenance of buildings. Energy sources include emissions associated with building electricity and natural gas usage (non-hearth). In addition, default assumptions in CalEEMod were used for natural gas consumption. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the location of power generation, which is typically off site.

Based on the type of project, there are additional emission sources that are either not captured in CalEEMod or specifics are not available to accurately estimate emissions using CalEEMod. For most of these sources, because specifics are not available to accurately estimate emissions from these anticipated sources under the proposed project, associated emissions are not included in the estimated emissions presented herein. However, in a good faith effort to include sources typically associated with warehouse/industrial land uses, forklifts, yard trucks, and emergency generators are included in the proposed project's emission inventory.

The SCAQMD published a high cube warehouse truck trip study white paper summary of business survey results, which summarizes various operational results from 34 operating high cube warehouses (“SCAQMD Survey,” SCAQMD 2014). The SCAQMD Survey reported an average of 0.12 forklifts/pallet jacks per 1,000 square feet of building area, which was applied to the proposed project. For the proposed project, a total of 25 forklifts were assumed. All indoor forklifts are anticipated to be electric-powered and while the majority of forklifts are anticipated to be used indoors, to conservatively capture the potential for outdoor forklift usage, 75% of the forklifts were assumed to be indoor and 25% were assumed to be outdoor.

Industrial warehouse building operations may require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers, which is commonly done by yard trucks. Yard trucks, which are also called yard goats, utility tractors, hustlers, yard hostlers, and yard tractors, were reported at the majority of the 34 high cube warehouses in the SCAQMD Survey with an average usage of 3.6 hostlers per million square feet of building area. The 3.6 hostlers per million square feet of building area was applied to the proposed project – both warehouse and manufacturing land uses – with the proposed project totaling 1 yard truck.

Table 3 presents the maximum daily emissions associated with operation of the proposed project and the existing land use. The values shown are the maximum summer or winter daily emissions results from CalEEMod and EMFAC. Complete details of the emissions calculations are provided in Appendix A.

Table 3. Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>Pounds per day</i>					
Area	4.78	<0.01	0.03	0.00	<0.01	<0.01
Energy	0.01	0.08	0.07	<0.01	0.01	0.01
Mobile	0.82	25.91	16.29	0.15	19.74	5.01
Off-road	2.54	25.80	36.23	0.05	1.25	1.15
Stationary	0.31	0.66	5.73	0.01	0.33	0.33
<i>Total</i>	<i>8.46</i>	<i>52.45</i>	<i>58.35</i>	<i>0.21</i>	<i>21.33</i>	<i>6.50</i>
SCAQMD Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Notes:**

VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter); PM<sub>2.5</sub> = particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter); SCAQMD = South Coast Air Quality Management District.

See Appendix A for complete results.

Values of “<0.01” indicate that the estimated emissions are less than two decimals. Numbers in parenthesis represent a negative number. The values shown are the maximum summer or winter daily emissions results from CalEEMod. The total values may not add up exactly due to rounding.

As shown in Table 3, the net maximum daily operational emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would not exceed the SCAQMD's significance thresholds.

As discussed previously, the SCAB has been designated as a federal nonattainment area for O<sub>3</sub> and PM<sub>2.5</sub>, and a state nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Construction and operational activities of the proposed project would generate VOC and NO<sub>x</sub> emissions (precursors to O<sub>3</sub>) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. However, as indicated in Tables 2 and 3, project-generated emissions would not exceed the SCAQMD emission-based significance thresholds for VOCs, NO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>.

Cumulative localized impacts would potentially occur if construction of a project were to occur concurrently with another off-site project. Schedules for potential future projects near the project area are currently unknown; therefore, potential impacts associated with two or more simultaneous projects would be considered speculative.<sup>4</sup> However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by SCAQMD. Cumulative PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions would be reduced because all future projects would be subject to SCAQMD Rule 403, Fugitive Dust, which sets forth general and specific requirements for all sites in the SCAQMD, and SCAQMD Rule 1113, which regulates VOC emissions in architectural coatings.

Based on the preceding considerations, the proposed project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant during construction and operation.

### **Health Effects of Criteria Air Pollutants**

Construction emissions of the proposed project would not exceed the SCAQMD thresholds for any criteria air pollutants, including VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

Health effects associated with O<sub>3</sub> include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019). VOCs and NO<sub>x</sub> are precursors to O<sub>3</sub>, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO<sub>x</sub> to regional ambient O<sub>3</sub> concentrations is the result of complex photochemistry. The increases in O<sub>3</sub> concentrations in the SCAB due to O<sub>3</sub> precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Further, the potential for exacerbating excessive O<sub>3</sub> concentrations would also depend on the time of year that the VOC emissions would occur, because exceedances of the O<sub>3</sub> NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project's emissions of O<sub>3</sub> precursors is speculative. That being said, because the proposed project would not exceed the SCAQMD thresholds, the proposed project would not contribute to health effects associated with O<sub>3</sub>.

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<sup>4</sup> The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

Health effects associated with NO<sub>x</sub> include lung irritation and enhanced allergic responses (CARB 2019). Because project-related NO<sub>x</sub> emissions would not exceed the SCAQMD mass daily thresholds, and because the SCAB is a designated attainment area for NO<sub>2</sub> and the existing NO<sub>2</sub> concentrations in the area are well below the NAAQS and CAAQS standards, it is not anticipated that the proposed project would cause an exceedance of the NAAQS and CAAQS for NO<sub>2</sub> or result in potential health effects associated with NO<sub>2</sub> and NO<sub>x</sub>.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019). CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots was discussed previously and determined to be less than significant. Thus, the project's CO emissions would not contribute to significant health effects associated with CO.

Health effects associated with PM<sub>10</sub> include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2019). Construction of the project would not exceed thresholds for PM<sub>10</sub> or PM<sub>2.5</sub>, would not contribute to exceedances of the NAAQS and CAAQS for particulate matter, and would not obstruct the SCAB from coming into attainment for these pollutants. The project would also not result in substantial diesel particulate matter emissions during construction. Additionally, the project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Due to the minimal contribution of particulate matter during construction, the project is not anticipated to result in health effects associated with PM<sub>10</sub> or PM<sub>2.5</sub>.

In summary, construction and operation of the proposed project would not result in exceedances of the SCAQMD significance thresholds for certain criteria pollutants, and potential health effects associated with criteria air pollutants would be less than significant.

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

**Less-than-Significant Impact with Mitigation Incorporated.** Localized project impacts associated with construction criteria air pollutants emissions are assessed as follows.

**Sensitive Receptors**

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). Sensitive receptors in the vicinity of the project site consist of residential uses located to the north, south and east of the project site, and residences further to the northwest. The closest sensitive receptor would be located approximately 110 feet north of the project site at a home-based trucking business.

**Localized Significance Thresholds**

A localized significance threshold (LST) analysis has been prepared to determine potential impacts to nearby sensitive receptors during construction of the project. The SCAQMD recommends the evaluation of localized NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> impacts as a result of construction activities to sensitive receptors in the immediate vicinity of the project site. The impacts were analyzed using methods consistent with those in the SCAQMD’s Final Localized Significance Threshold Methodology (SCAQMD 2009). The project is located in Source Receptor Area (SRA) 34 (Central San Bernardino Valley). According to the *Final Localized Significance Threshold Methodology*, “off-site mobile emissions from the project should not be included in the emissions compared to the LSTs” (SCAQMD 2009). Hauling of soils and construction materials associated with project construction are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways. Localized emissions from the trucks would be relatively brief in nature and would cease once the trucks pass through the main streets.

Construction activities associated with the project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Operational emissions include use of onsite mobile sources. The maximum daily on-site construction emissions generated during construction of the proposed project is presented in Table 4 and compared to the SCAQMD localized significance criteria for SRA 34 to determine whether project-generated on-site construction emissions would result in potential LST impacts.

Table 4. Localized Significance Thresholds Analysis for Project - Unmitigated

Maximum On-Site Emissions	NO <sub>2</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	<i>Pounds per Day</i>			
Construction Emissions	20.86	15.27	3.89	2.38
SCAQMD LST	170	972	7	4
<b>LST Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Operational Emissions	24.68	12.19	0.55	0.54
SCAQMD LST	170	972	2	1
<b>LST Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

**Source:** SCAQMD 2009.

**Notes:** NO<sub>2</sub> = nitrogen dioxide; CO = carbon monoxide; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold. See Appendix A for complete results.

Localized significance thresholds are shown for a 2-acre project site corresponding to a distance to a sensitive receptor of 25 meters.

These estimates implementation of the proposed project’s fugitive dust control strategies, including watering of the project site and unpaved roads two times per day.

Diesel equipment would be subject to the CARB air toxic control measures for in-use off-road diesel fleets, which would minimize diesel particulate matter (DPM) emissions, as shown in Table 4, construction and operational activities would not generate emissions in excess of site-specific LSTs; therefore, localized impacts during construction and operation of the proposed project would be less than significant. No mitigation is required.

## **Health Impacts of Carbon Monoxide**

Mobile source impacts occur on two scales of motion. Regionally, proposed project-related travel would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SCAB. Locally, traffic generated by the proposed project would be added to the County's roadway system near the proposed project site. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-proposed project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. Because of continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

At the time that the SCAQMD 1993 Handbook was published, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO. In 2007, the SCAQMD was designated in attainment for CO under both the CAAQS and NAAQS as a result of the steady decline in CO concentrations in the SCAB due to turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities. The SCAQMD conducted CO modeling for the 2003 AQMP (Appendix V: Modeling and Attainment Demonstrations, SCAQMD 2003b) for the four worst-case intersections in the SCAB: (1) Wilshire Boulevard and Veteran Avenue, (2) Sunset Boulevard and Highland Avenue, (3) La Cienega Boulevard and Century Boulevard, and (4) Long Beach Boulevard and Imperial Highway. At the time the 2003 AQMP was prepared, the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 parts per million (ppm) at the intersection of Wilshire Boulevard and Veteran Avenue. When added to the maximum 1-hour CO concentration from 2016 through 2018 at the Fontana monitoring station, which was 2.7 ppm in 2019, the 1-hour CO would be 7.3 ppm, while the CAAQS is 20 ppm.

The 2003 AQMP also projected 8-hour CO concentrations at these four intersections for 1997 and from 2002 through 2005. From years 2002 through 2005, the maximum 8-hour CO concentration was 3.8 ppm at the Sunset Boulevard and Highland Avenue intersection in 2002; the maximum 8-hour CO concentration was 3.4 ppm at the Wilshire Boulevard and Veteran Avenue in 2002. Adding the 3.8 ppm to the maximum 8-hour CO concentration from 2016 through 2018 at the Fontana monitoring station, which was 1.3 ppm in 2017, the 8-hour CO would be 5.1 ppm, while the CAAQS is 9.0 ppm.

Accordingly, CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. Because the project would not increase daily traffic volumes at any study intersection to more than 100,000 vehicles per day, a CO hotspot is not anticipated to occur and associated impacts would be less than significant. No mitigation is required.

## Construction Health Risk

In addition to impacts from criteria pollutants, certain projects may include emissions of pollutants identified by the state and federal government as toxic air contaminants (TACs) or hazardous air pollutants. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal hazardous air pollutants, and is adopting appropriate control measures for sources of these TACs.

Health impacts associated with TACs are generally associated with long-term exposure. The greatest potential for TAC emissions during construction would be diesel particulate emissions from heavy equipment operations and heavy-duty trucks. In an abundance of caution, a voluntary health risk assessment (HRA) was performed for the project. The following paragraphs describe the HRA, and the detailed assessment is provided in Appendix A.

The Office of Environmental Health Hazard Assessment's (OEHHA's) most recent guidance is the *2015 Risk Assessment Guidelines Manual* (OEHHA 2015), which was adopted in 2015 to replace the 2003 HRA Guidance Manual. The Children's Environmental Health Protection Act of 1999 (Senate Bill [SB] 25), which requires explicit consideration of infants and children in assessing risks from air toxics, requires revisions of the methods for both non-cancer and cancer risk assessment and of the exposure assumptions in the 2003 HRA Guidance Manual. Cancer risk parameters, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors, were based on the values and data recommended by OEHHA as implemented in Hot Spots Analysis and Reporting Program 2 (HARP2). SCAQMD's Modeling Guidance for American Meteorological Society/EPA Regulatory Model (AERMOD) (SCAQMD 2020) and Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003b) provides guidance to perform dispersion modeling for use in HRAs within the SCAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index (HIC) is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The HIC estimates for all receptor types used the 'OEHHA Derived' calculation method, which uses high-end exposure parameters for the inhalation and next top two exposure pathways and mean exposure parameters for the remaining pathways for non-cancer risk estimates. The HIC is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system.<sup>5</sup> A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The SCAQMD recommends a HIC significance threshold of 1.0 (project increment) and an acute hazard index of 1.0. The exhaust from diesel

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<sup>5</sup> The Chronic Hazard Index estimates for all receptor types used the OEHHA Derived calculation method (OEHHA 2015).

engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment. The dispersion modeling was performed using AERMOD, which is the model SCAQMD requires for atmospheric dispersion of emissions. AERMOD (version 19191) is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain.

The project’s potential cancer and noncancer health impacts were evaluated using exposure periods appropriate to evaluate short-term emission increases (third trimester of pregnancy to 15 months). The exposure duration for a student would start at age 5 through age 10 at an elementary school (Redwood Elementary School). Emissions dispersion of DPM was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2. HARP2 (ADMRT, version 19121) implements the March 2015 OEHHA age-weighting methodology for assessing toxics risks. The chemical exposure results were then compared to SCAQMD thresholds to assess project significance. Principal parameters of this modeling are presented in Table 5.

Table 5. Construction Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Construction Principal Parameters

Parameter	Details
Meteorological Data	The SCAQMD requires the use of AERMOD for air dispersion modeling. The latest 5-year meteorological data for the Ontario International Airport station (Station ID 3102) from SCAQMD were downloaded, then input to AERMOD. For cancer or chronic noncancer risk assessments, the average cancer risk of all years modeled was used.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines. San Bernardino County’s population 2,035,210 was used in the analysis (SCAQMD 2018).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset (NED) dataset with resolution of 1/3 arc-second was used (SCAQMD 2018).
Source Release Characterizations	Air dispersion modeling of DPM emissions was conducted assuming the equipment would operate in accordance with the modeling scenario estimated in CalEEMod (Appendix A). The construction equipment DPM emissions were modeled as a line of adjacent volume sources across the project site to represent project construction with a release height of 5 meters, plume height of 2.33 meters, and plume width of 11.63 meters (SCAQMD 2008; EPA 2004). On-site truck travel was modeled as a line volume source across the project site, and based on EPA methodology, the modeled sources would result in a release height of 3.4 meters, a plume height of 3.16 meters, and a plume width of 3.12 meters (EPA 2019).

**Note:** AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model; DPM = diesel particulate matter.  
 See Appendix A.

This HRA evaluated impacts using a uniform Cartesian grid of receptors spaced 50 meters apart, approximately 1,000 meters from the project site, and then converted to discrete receptors.

Construction of project components would require use of heavy-duty construction equipment, which is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions, and would involve use of diesel trucks, which are also subject to an Airborne Toxics Control Measure. Construction of project components would occur over a total of 15 months and would be periodic and short term within each phase. The results of the HRA during construction are provided in Table 6.

Table 6. Construction Activity Health Risk Assessment Results – Unmitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk (MICR)– Residential	Per Million	32.6	10.0	Potentially Significant
MICR—Student	Per Million	4.56	10.0	Less than Significant
HIC	Not Applicable	0.03	1.0	Less than Significant

**Source:** Appendix A.

**Notes:** CEQA = California Environmental Quality Act; MICR = maximum individual cancer risk; HIC = Chronic Hazard Index.

As shown in Table 6, project construction activities would result in a Residential Maximum Individual Cancer Risk of 32.6 in 1 million, which exceeds the significance threshold of 10 in 1 million. However, the exposure for a student at Redwood Elementary School is estimated at 4.56, which is below the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.03, which is below the 1.0 significance threshold. The project construction TAC health risk impacts would be potentially significant and thus mitigation would be required.

**MM-AQ-1:** Prior to the issuance of the conditional use permit for the project, the County shall verify the following condition is included in the conditional use permit:

Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 75 horsepower or greater diesel-powered

equipment are powered with California Air Resources Board (CARB)-certified Tier 4 Interim engines, except where the project applicant establishes to the satisfaction of the County that Tier 4 Interim equipment is not available.

An exemption from this requirement may be granted by the County if (1) the County documents equipment with Tier 4 Final engines are not reasonably available, and (2) the required corresponding reductions in criteria air pollutant emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in San Bernardino County were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within the County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method and documentation provided to the County to confirm that necessary project-generated emissions reductions are achieved.

As shown in Table 6, the construction HRA results from the unmitigated scenario show cancer risks exceeding the 10 in 1 million threshold and thus a potentially significant impact at the maximally exposed individual residential receptors. Implementation of MM-AQ-1 would reduce project construction-generated DPM missions to the extent feasible. The HRA results after incorporation of MM-AQ-1 are presented in Table 7.

Table 7. Construction Health Risk Assessment Results – Mitigated

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk (MICR)– Residential	Per Million	3.80	10	Less than significant
MICR—Student	Per Million	0.53	10	Less than Significant
Chronic Hazard Index – Residential	Index Value	0.0035	1.0	Less than Significant

**Source:** SCAQMD 2019.

**Notes:** CEQA = California Environmental Quality Act.  
 See Appendix A.

Implementation of MM-AQ-1 would reduce construction-generated health risks to levels below SCAQMD thresholds. Thus, impacts would be less than significant with mitigation incorporated.

## **Operational Health Risk**

CARB's Air Quality and Land Use Handbook: A Community Health Perspective encourages consideration of the health impacts of distribution centers that accommodates more than 100 trucks per day on sensitive receptors sited within 1,000 feet from the source in the land use decision-making process (CARB 2005). For the operational health risk, the operation year 2024 was assumed consistent with completion of project construction. Emissions from the operation of the project include truck trips and truck idling emissions. For risk assessment purposes, PM<sub>10</sub> in diesel exhaust is considered DPM, originating mainly from truck traveling on site and off site and truck idling located at the loading docks and yard truck operation. Truck travel and idling emission rates were obtained from CARB's EMFAC2017. Emission factors representing the vehicle mix and emissions for 2024 were used to estimate emissions associated with operation of the project. Truck idling would be limited to 5 minutes in accordance with CARB's adopted Airborne Toxic Control Measure; however, truck idling was conservatively assumed to idle for 15 minutes to account for entrance, exit and loading dock idling. Therefore, the analysis conservatively overestimates DPM emissions from idling. All deliveries would occur Monday through Sunday. Compressed natural gas-powered and electric forklifts and pallet lifts will be operated in the loading dock areas.

Conservatively, a 2024 EMFAC2017 run was conducted and a constant 2024 emission factor data set was used for the entire duration of the analysis (i.e., 30 years). Use of the 2024 emission factors would overstate potential impacts since this approach does not include reductions in emissions due to fleet turnover or cleaner technology with lower emissions. The truck travel DPM emissions were calculated by applying the exhaust PM<sub>10</sub> emission factor from EMFAC2017 and the total truck trip number over the length of the distance traveled. In addition, the on-site truck idling exhaust emissions were calculated by applying the idle exhaust PM<sub>10</sub> emission factor from EMFAC2017 and total truck trip over the total idling time (i.e., 15 minutes).

The dispersion modeling was performed using AERMOD (version 18081). The truck traffic was modeled as a line of adjacent volume sources with 20% of the truck traffic receiving and leaving from the west along Whittram Avenue and 80% to and from the east along Whittram Avenue and then north and south via Cherry Avenue. Truck idling was modeled as stationary sources. The yard truck operation was modeled as a line volume source with operation throughout the loading bay area.

As previously described, health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Some TACs increase noncancer health risk due to long-term (chronic) exposures. A hazard index less than one (1.0) means that adverse health effects are not expected. Within this analysis, noncarcinogenic exposures of less than 1.0 are considered less than significant. The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure values are established and regulated and are therefore not addressed in this assessment.

Dudek evaluated the project’s potential cancer and noncancer health impacts using exposure periods appropriate to evaluate long-term emission increases (third trimester of pregnancy to 30 years). Emissions dispersion of DPM was modeled using AERMOD, then cancer risk and noncancer health impacts subsequently using the CARB HARP2 (ADMRT, version 19121). The chemical exposure results were then compared to SCAQMD thresholds to assess project significance. Principal parameters of this modeling are presented in Table 8.

Table 8. Operational Health Risk Assessment American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Operational Principal Parameters

Parameter	Details
Meteorological Data	The SCAQMD requires the use of AERMOD for air dispersion modeling. The latest 5-year meteorological data for the Ontario International Airport station (Station ID 3102) from SCAQMD were downloaded, then input to AERMOD. For cancer or chronic noncancer risk assessments, the average cancer risk of all years modeled was used.
Urban versus Rural Option	Urban dispersion option was selected due to the developed nature of the project area and per SCAQMD guidelines. San Bernardino County’s population 2,035,210 was used in the analysis (SCAQMD 2018).
Terrain Characteristics	Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate. Per SCAQMD guidance, the National Elevation Dataset (NED) dataset with resolution of 1/3 arc-second was used (SCAQMD 2018).
Emission Sources and Release Parameters	Air dispersion modeling of operational activities was conducted using emissions generated using EMFAC2017.
Source Release Characterizations	Off-site and on-site truck travel were modeled as a line of adjacent volume sources, and based on EPA methodology, the modeled sources would result in a release height of 3.4 meters, a plume height of 3.16 meters, and a plume width of 1.56 meters (EPA 2019). The truck idling emissions were modeled as a stationary source with a 4-meter exhaust height and 0.1-meter exhaust diameter (EPA 2019; SCAQMD 2003b; SJVAPCD 2006). The proposed project building was modeled to account for building downwash.

**Note:** AERMOD = American Meteorological Society/Environmental Protection Agency Regulatory Model; SCAQMD = South Coast Air Quality Management District; EPA = U.S. Environmental Protection Agency. See Appendix A.

This HRA evaluated impacts using a uniform Cartesian grid of receptors spaced 50 meters apart, 1,000 meters from the project site and near truck routes, and then converted to discrete receptors.

For the operational health risk, the HRA assumes exposure would start in the third trimester of pregnancy through 30 years for all residential sensitive receptor locations. The exposure duration for a student would start at age 5 through age 10 at an elementary

school (Redwood Elementary School). The SCAQMD has also established noncarcinogenic risk parameters for use in HRAs since some TACs increase non-cancer health risk due to long-term (chronic) exposures. Noncarcinogenic risks are quantified by calculating a hazard index, expressed as the ratio between the ambient pollutant concentration and its toxicity or reference exposure level, which is a concentration at or below which health effects are not likely to occur. The chronic hazard index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system, similarly calculated for acute hazard index. The results of the HRA during operation are provided in Table 9.

Table 9. Operational Health Risk Assessment Results

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Maximum Individual Cancer Risk (MICR)— Residential	Per Million	0.80	10	Less than Significant
MICR—Student	Per Million	0.21	10	Less than Significant
HIC	Index Value	0.0002	1.0	Less than Significant

**Source:** SCAQMD 2019; Appendix A.

**Notes:** CEQA = California Environmental Quality Act.

The results of the operational analysis demonstrate that the exhibit maximum individual cancer risk for the student and residential receptors are below the 10 in a million threshold and below the HIC threshold. Therefore, the project operation TAC health risk impacts would be less than significant.

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

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

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

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The proposed project would not

include land uses that generate odors as discussed above during operation. Therefore, project operations would result in an odor impact that is less than significant.

**Therefore, with implementation of MM-AQ-1, no significant adverse impacts are identified or anticipated.**

#### IV. BIOLOGICAL RESOURCES

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Conflict with any local policies or ordinances protecting biological	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION: (Check if project is located in the Biological Resources Overlay or contains habitat for any species listed in the California Natural Diversity Database ):

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

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

**Less-than-Significant Impact.** The project site is located in an urban environment within a predominantly industrial part of the County. While the majority of the site is comprised of dirt and gravel surfaces, some plant species are supported. Plant species found on the project site consist of ruderal and ornamental non-native species, including small, scattered areas of turf, as well as common weedy varieties growing within the less-maintained areas of the site. Additionally, several ornamental trees are located along the project site's northern and western borders. Due to the disturbed and developed condition of the project site, no native plant species are expected to occur on site. Together, the on-site plant species form a non-native, non-cohesive plant community not anticipated to support any candidate, sensitive, or special-status plant species.

Based upon the urbanized nature of the project area, wildlife species that could potentially occur in the surrounding area include common species typically found in urban/developed settings such as mourning dove (*Zenaida macroura*), desert cottontail (*Sylvilagus audubonii*), and western fence lizard (*Sceloporus occidentalis*). The on-site land cover is not known to support any candidate, sensitive, or special-status wildlife species. The scattered trees and shrubs on the project site could potentially be used by migratory birds for breeding during the nesting season (i.e., February 1 through August 31). However, should construction of the project require vegetation removal during the nesting season, the project would be required to comply with the applicable sections of the Migratory Bird Treaty Act and California Department of Fish and Game Code. In conformance with the requirements of the Migratory Bird Treaty Act and California Department of Fish and Game code, should vegetation clearing, cutting, or removal activities be required during the nesting season, the project applicant would be required to conduct a nesting bird survey within 7 calendar days of such activities to ensure that no occupied nests would be affected by the project. If nests are found, construction crews would be required to establish a buffer around the nest until the nest is no longer being used for breeding or rearing, as determined by a qualified biologist. With compliance with the Migratory Bird

Treaty Act and California Department of Fish and Game code, direct and indirect impacts to nesting birds from construction-related activities would be less than significant.

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

**No Impact.** The project site is located entirely on disturbed/developed land. No natural vegetation communities are present within the impact footprint. As a result, there would be no impact to riparian or sensitive vegetation communities.

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

**No Impact.** There are no features within the project site that may be considered waters of the United States or waters of the State. This includes the absence of federally defined wetlands and other waters (e.g., drainages) and state-defined waters (e.g., streams and riparian extent). The project would be subject to the typical restrictions (e.g., best management practices [BMPs]) and requirements that address erosion and runoff, including those of the Clean Water Act and National Pollutant Discharge Elimination System permit. With implementation of BMPs and permit conditions, no indirect impacts would occur. It is assumed that all construction activities would be limited to developed and/or disturbed land covers. Therefore, no direct impacts to jurisdictional waters or wetlands would occur.

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

**No Impact.** The project site is a developed and highly disturbed property that enclosed with security fencing and located in a predominately industrial area. The Jurupa Mountains is the nearest open space and located approximately 3.5 miles to the south. Due to the matrix of development surrounding the project site, the project does not constrain natural wildlife movement in its vicinity. Therefore, no direct impacts to wildlife movement would occur.

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

**Less-than-Significant Impact.** Per the County Development Code, Section 88.01.050, Tree or Plant Removal Permits, in order to minimize impacts to biological resources associated with new development projects, a tree or plant removal permit shall be required for the removal of a regulated tree or plant as identified in the County Development Code (San Bernardino County 2007a). Regulated trees shall include: (1) native trees, classified as a living, native tree with a six inch or greater stem diameter or 19 inches in circumference measured 4.5 feet above natural grade level; and (2) three or more palm trees planted linearly, which are 50 feet or greater in length (San Bernardino County 2007a). Implementation of the project is expected to remove onsite trees prior to construction; however, the trees proposed to be removed would not be classified as regulated trees. Therefore, based on compliance

with existing local code, impacts associated with tree removal or any other local policies or ordinances protecting biological resources would be less than significant.

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

**No Impact.** The project is not within any habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts associated with an adopted conservation plan would occur.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**V. CULTURAL RESOURCES**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:** (Check if the project is located in the Cultural  or Paleontologic  Resources overlays or cite results of cultural resource review): San Bernardino County Policy Plan, 2020; Cultural Historical Resources Information System (CHRIS), South Central Coast Information Center, California State University, Fullerton; Submitted Project Materials; Cultural Resources Assessment (Appendix B)

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

**Less-than-Significant Impact.** The majority of the approximately 10.02-acre, rectangular project site is vacant, although some remnants of former industrial uses remain on site, including partial concrete foundations, storage/shed structures, auto and construction vehicles in various states of operability, and a residence-based business building. The remainder of the site consists of dirt and gravel surfaces.

As recently as 2017, the project site was fully utilized with industrial uses. These uses include a truck dismantling and heavy equipment repair business, wood recycling business, and scrap metal recycling business (associated with the adjacent Advanced Steel Recovery business). Historically, the project site has been used for heavy industrial purposes since the early 1970s. Prior to the 1970s, the project site was used for agricultural purposes.

As defined by the CEQA Guidelines (14 CCR 15000 et seq.), a “historical resource” is a resource that is listed in or eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), has been identified as significant in a historical resource survey, or is listed on a local register of historical resources.

The criteria for listing resources in the CRHR were developed to be in accordance with previously established criteria developed for listing in the NRHP. Thus, the criteria are expressed in accordance with the NRHP criteria. According to California Public Resources Code Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[b]). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code, Section 5024.1[q]), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (California Public Resources Code, Section 21084.1; 14 CCR 15064.5[a]).

For a building to be considered historic, it typically must be at least 50 years old so sufficient time has passed to determine whether the events or characteristics of the building will have a contribution to history (OHP 2015). The Cultural Resources Technical Report (Appendix B) identified two buildings over 45 years old requiring recordation and evaluation for historical significance: the 14253 Whittram Avenue property and all associated buildings (a residential building converted to an office and a two-bay truck garage). According to the Cultural Resources Technical Report, the property and structures do not meet any of the criteria for listing in the NRHP or CRHR (Appendix B). Additionally, there is no evidence that any of the existing on-site structures are associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; are associated with the lives of persons important in our past; or have yielded, or may be likely to yield, information important in prehistory or history.

Thus, none of the structures on the project site would be considered historical resources as defined by CEQA. Therefore, impacts associated with historical resources would be less than significant.

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

***Less-than-Significant Impact with Mitigation Incorporated.*** A pedestrian survey, background research, and records searches conducted as part of the Cultural Resources Technical Report (Appendix B) found that there is little potential for the inadvertent discovery of subsurface archaeological, paleontological, or other cultural resources materials during earthwork activities. The records searches conducted at the South Central Coastal Information Center indicated that no previously recorded prehistoric, historic, or built-environment resources are located within the project site. The records search identified 13 previously conducted cultural resources technical investigations within the records search area. Within 0.5 miles of the project site, 5 cultural resources were previously recorded. Two of these previously recorded cultural resources are historic-era archaeological resources and three are built environment resources; however, none of these previously recorded sites are located on or directly adjacent to the project site.

The pedestrian survey results characterize the project site as entirely disturbed by decades of development activity. As concluded from archival research, the project site was used for agricultural purposes in the early twentieth century before transitioning to residential and industrial activities. No cultural resources were identified within the project site as a result of the pedestrian survey.

Although the project site has been disturbed over time as a result of development, it is possible that unknown subsurface archaeological resources could be encountered during ground disturbing activities within native soils. Thus, mitigation measures are required to address impacts related to the unlikely event of inadvertent discovery of archaeological resources during construction, as outlined in MM-CUL-1 and MM-CUL-2, as well as MM-TCR-1 through MM-TCR-3 (as discussed in Section XVIII, Tribal Cultural Resources). With the incorporation of mitigation, impacts to buried, currently unrecorded/unknown archaeological resources would be less than significant.

**MM-CUL-1** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. This may occur at the same time as the pre-construction sensitivity/educational meeting (pursuant to MM-TCR-1). A basic PowerPoint presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the Workers Environmental Awareness Program (WEAP) training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human

remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.

**MM-CUL-2** A qualified archaeologist shall be retained and on-call to respond and address any inadvertent discoveries identified during excavations in native soil. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop and a qualified archaeologist shall be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

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

**Less-than-Significant Impact with Mitigation Incorporated.** Given the developed nature of the project area, earthwork activities associated with project construction are unlikely to uncover previously unknown archaeological resources. Nonetheless, MM-CUL-3 shall be implemented to mitigate potential impacts to a less than significant level. MM-CUL-3 states that if human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. If the County Coroner determines or has reason to believe the remains are those of a Native American, they must contact the California Native American Heritage Commission within 24 hours, and the Native American Heritage Commission will notify the Most Likely Descendant. The Most Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans. As such, if Native American remains were uncovered during project construction, compliance with existing regulations would ensure that the appropriate authorities are notified and that discovered remains are treated with the appropriate respect and dignity. Therefore, with implementation of MM-CUL3, impacts associated with human remains would be less than significant.

**MM-CUL-3** If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project. If the County Coroner determines or has reason to believe the remains are those of a Native American, they must contact the California Native American Heritage Commission within 24 hours, and the Native American Heritage

Commission will notify the Most Likely Descendant. The Consulting Tribe(s) (i.e., interested Tribes who have requested and engaged in formal Tribal consultation) shall be consulted in determining the Most Likely Descendant. The Most Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

**Therefore, with implementation of MM-CUL-1 through MM-CUL-3, no impacts are identified or anticipated.**

## VI. ENERGY

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
SUBSTANTIATION: San Bernardino Countywide Policy Plan, 2020; Submitted Materials; Air Quality and GHG Emissions Attachments (Appendix A)					

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

**Less-than-Significant Impact.** The service providers, supply sources, and estimated consumption for electricity, natural gas, and petroleum is discussed below.

### Energy Overview

#### *Electricity*

Southern California Edison (SCE) provides electricity to County residents and businesses, including those the project site. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across central and Southern California. According to the California Energy Commission, approximately 83 billion kilowatt-hours (kWh) of electricity were used in SCE's service area in 2018 (CEC 2019). Demand forecasts

anticipate that approximately 75 billion kWh of electricity will be used in SCE's service area in 2020 (CPUC 2019).

#### *Natural Gas*

SoCalGas serves the County (including the proposed project area). SoCalGas serves 21.6 million customers in a 20,000-square-mile service area that includes over 500 communities (SoCalGas 2018). In 2016 (the most recent year for which data is available), SoCalGas delivered 5,123 million therms of natural gas, with the majority going to residential uses. Demand for natural gas can vary depending on factors such as weather, price of electricity, the health of the economy, environmental regulations, energy-efficiency programs, and the availability of alternative renewable energy sources. Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand.

#### *Petroleum*

Transportation accounts for the majority of California's total energy consumption (CEC 2018). According to the United States Energy Information Administration, California used approximately 681 million barrels of petroleum in 2018 (EIA 2019). This equates to a daily use of approximately 1.8 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 77 million gallons of petroleum per day, adding up to an annual consumption of 28 billion gallons of petroleum. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled.

### **Construction Energy Use**

#### *Electricity*

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

#### *Natural Gas*

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

#### *Petroleum*

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

construction workers would travel to and from the site in gasoline-powered passenger vehicles.

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

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO<sub>2</sub>) emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Construction is estimated to occur in the years 2022 and 2023 based on the construction phasing schedule. The conversion factor for gasoline is 8.78 kilograms per metric ton CO<sub>2</sub> per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO<sub>2</sub> per gallon (The Climate Registry 2020). The estimated diesel fuel usage from construction equipment is shown in Table 10.

Table 10. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO <sub>2</sub> (MT)	kg/CO <sub>2</sub> /Gallon	Gallons
Demolition	6	33.99	10.21	3,329.11
Site Preparation	7	16.72	10.21	1,637.58
Grading	3	26.05	10.21	2,551.88
Building Construction	9	266.49	10.21	26,101.05
Paving	6	20.03	10.21	1,961.50
Architectural Coating	1	3.83	10.21	375.11
<b>Total</b>				<b>36,078.56</b>

**Sources:** Pieces of equipment and equipment CO<sub>2</sub> (Appendix A); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** CO<sub>2</sub> = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel consumption from worker and vendor trips are estimated by converting the total CO<sub>2</sub> emissions from each construction phase to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Worker vehicles are assumed to be gasoline and vendor/hauling vehicles are assumed to be diesel.

Calculations for total worker, vendor, and haul truck fuel consumption are provided in Tables 11, 12, and 13.

Table 11. Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Demolition	320	1.47	8.78	167.90
Site Preparation	180	0.83	8.78	94.45
Grading	320	1.47	8.78	167.90

Table 11. Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> / Gallon	Gallons
Building Construction	41,400	190.11	8.78	21,652.69
Paving	320	1.42	8.78	161.65
Architectural Coating	1,080	4.79	8.78	545.56
<b>Total</b>				<b>23,094.92</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix A); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).  
**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

Table 12. Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Demolition	0	0.00	10.21	0.00
Site Preparation	0	0.00	10.21	0.00
Grading	0	0.00	10.21	0.00
Building Construction	16,100	194.30	10.21	19,030.06
Paving	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
<b>Total</b>				<b>19,030.06</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix A); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).  
**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

Table 13. Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Demolition	32	1.18	10.21	115.63
Site Preparation	0	0.00	10.21	0.00
Grading	0	0.00	10.21	0.00
Building Construction	0	0.00	10.21	0.00
Paving	0	0.00	10.21	0.00
Architectural Coating	0	0.00	10.21	0.00
<b>Total</b>				<b>115.63</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix A); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).  
**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram.

In summary, construction of the proposed project is anticipated to consume 23,095 gallons of gasoline and 55,224 gallons of diesel, which would last approximately 15 months.

Based on these assumptions, approximately 36 billion gallons of petroleum would be consumed in California over the course of the proposed project's construction phase based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019).

## **Operational Energy Use**

### *Electricity*

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

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

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. CalEEMod 2016.3.2 relies upon the Title 24 2016 standards which was adjusted to meet the 2019 standards. According to these estimations, the proposed project would consume approximately 546,035 kWh per year during operation (Appendix A). By comparison, the existing uses was estimated to consume approximately 78,981 kWh per year. The non-residential electricity demand in 2019 was 9,932,883,836 kWh (9,932 GWh) for the County (CEC 2020a). As such, the proposed project would have a negligible impact on demand for the County and SCE.

### *Natural Gas*

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

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

Title 24 of the California Code of Regulations serves to enhance and regulate California's building standards. The most recent amendments to Title 24, Part 6, referred to as the 2019 standards, became effective on January 1, 2020. According to these estimations, the proposed project would consume approximately 425,488 kilo-British Thermal Units (kBtu) per

year. By compression, the existing uses was estimated to consume approximately 232,147 kBtu per year. The non-residential natural gas consumption in 2019 was 27,223,826,780 kBtu for the County (CEC 2020b).

*Petroleum*

During operations, the majority of fuel consumption resulting from the proposed project would involve the use of motor vehicles traveling to and from the project site.

Petroleum fuel consumption associated with motor vehicles traveling to and from the project site is a function of the vehicle miles traveled (VMT) as a result of project operation. As shown in Appendix A, the annual VMT resulting from the proposed project is expected to be 3,176,668 VMT. Similar to the construction worker and vendor trips, fuel consumption from worker and truck trips are estimated by converting the total CO<sub>2</sub> emissions from operation of the proposed project to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. Mobile source emissions were estimated using the EMFAC2017.

Calculations for annual mobile source fuel consumption are provided in Table 14.

Table 14. Annual Mobile Source Petroleum Demand

Fuel	Vehicle MT CO <sub>2</sub>	kg/CO <sub>2</sub> /Gallon	Gallons
Gasoline	405.22	8.78	46,152.62
Diesel	2,112.54	10.21	206,908.91
<b>Total</b>			<b>253,061.53</b>

**Sources:** Trips and vehicle CO<sub>2</sub> (Appendix A); kg/CO<sub>2</sub>/Gallon (The Climate Registry 2020).

**Notes:** MT = metric ton; CO<sub>2</sub> = carbon dioxide; kg = kilogram

By comparison, the existing uses were estimated to consume approximately 253,062 gallons per year. Furthermore, California as a whole consumes approximately 28.6 billion gallons of petroleum per year (EIA 2019).

**Summary**

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

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

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

In summary, although natural gas and electricity usage would increase due to the implementation of the proposed project, the proposed project's energy efficiency would go beyond code compliance. Although the project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Therefore, impacts to energy resources during operation would be less than significant.

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

**Less-than-Significant Impact.** The proposed project would implement energy-saving features and operational programs, consistent with the reduction measures set forth by the State. Notably, the project would comply with all applicable energy conservation requirements stipulated by the County's Building Standards Code, which is based on the California Green Building Code and is included in Chapter 15 of the County Code. In so doing, the project would meet or exceed all applicable County and California Building Standards Code Title 24 standards. Moreover, because the Building Code is periodically updated to contain more stringent energy reduction measures, the energy consumed by the project's operation would be comparable to, or less than, energy consumed by other industrial uses of similar scale and intensity that are already constructed and operating in California, due to the increasing stringency of Building Code requirements pertaining to energy efficiency. On this basis, the project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the project would not cause or result in the need for additional energy producing facilities or energy delivery systems. Therefore, the project would not conflict with state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

**Therefore, no impacts are identified or anticipated and no mitigation measures are required.**

## VII. GEOLOGY AND SOILS

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: (Check  if project is located in the Geologic Hazards Overlay District): San Bernardino Countywide Policy Plan, 2007; Submitted Project Materials

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Geotechnical Report (Appendix C)

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

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

**No Impact.** The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. As shown in Policy Map HZ-1, Earthquake Fault Zones, in the Policy Plan, the project site would not be located within an Alquist-Priolo Zone or a County designated fault hazard zone. The nearest Alquist-Priolo Zone is located approximately five (5.5) miles from the project site and the nearest County fault hazard zone is located approximately 12 miles north of the project site (County of San Bernardino 2020b). Additionally, based on a review of the California Department of Conservation regulatory maps (CDOC 2020b), the project site is not located in a designated earthquake fault zone. Therefore, no impacts associated with fault rupture would occur.

ii) **Strong seismic ground shaking?**

**Less-than-Significant Impact.** Similar to other areas located in the seismically active Southern California region, the County is susceptible to strong ground shaking during an earthquake. However, as previously addressed in Section VII (a)(i), the project site is not located within an active fault zone, and the site would not be affected by ground shaking more than any other area in this seismic region. Further, in accordance with the Geotechnical Report (Appendix C) prepared for the project, the project would incorporate seismic design parameters to ensure structural integrity during a seismic event. The seismic design parameters would be in accordance with the 2019 California Building Code, which sets forth specific engineering requirements (CBC 2019). Compliance with these requirements would reduce the potential risk to both people and structures with

respect to strong seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

**iii) Seismic-related ground failure, including liquefaction?**

**Less-than-Significant Impact.** Liquefaction occurs when partially saturated soil loses its effective stress and enters a liquid state, which can result in the soil's inability to support structures above. Liquefaction can be induced by ground-shaking events and is dependent on soil saturation conditions. As shown in Policy Map HZ-2, Liquefaction and Landslide Hazards, in the Policy Plan, the project site would not be located in area with susceptibility to liquefaction (County of San Bernardino 2020b). Therefore, impacts associated with liquefaction would be less than significant.

**iv) Landslides?**

**No Impact.** The project site consists of flat parcel within a developed industrial area and is not located adjacent to any potentially unstable topographical feature such as a hillside or riverbank. As shown in Policy Map HZ-2, Liquefaction and Landslide Hazards, in the Policy Plan, the project site would not be located in an area susceptible to landslides (County of San Bernardino 2020b). Therefore, no impacts associated with landslides would occur.

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

**Less-than-Significant Impact.** The project would result in the demolition and removal of the existing asphalt and structures on the project site and the construction of an industrial/warehouse building with associated improvements. The project would include a new engineered stormwater drainage system that would feature structural BMPs such as retention facilities to treat and manage storm water flows before conveying them into the public stormwater drain system. While the project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent practicable, demolition and construction activities would inevitably result in changes to the internal drainage patterns of the site. However, the project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the current Municipal Separate Storm Sewer System (MS4) Permit adopted by the Santa Ana Regional Water Quality Control Board (RWQCB). Per the requirements of the MS4 Permit, the project's Water Quality Management Plan (WQMP) would be required to demonstrate that the project's stormwater system can attenuate 2-year storm runoff flows (see discussion below for a discussion of the capacity of the stormwater system), thereby reducing the potential for the project to result in stormwater flows off-site that could result in erosion on or off site. Additionally, the project's structural BMPs would be designed such any potential sediments collected on-site are captured in retention facilities so that they would not be conveyed to downstream waters and result in siltation. As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater, such that they would not result in substantial erosion or siltation on or off site.

Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

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

**Less-than-Significant Impact.** As discussed in response VII (iii) and VII (iv), the project site would not be located in an area identified as susceptible to liquefaction or landslides (County of San Bernardino 2020b). The project site is flat and is not located adjacent to any potentially unstable topographical feature, such as a hillside or riverbank. Therefore, impacts associated with unstable soils would be less than significant.

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

**Less-than-Significant Impact.** The entire project site is mapped as tujunga gravelly loamy sand (USDA 2020), which is not made up of clay materials typically associated with expansive soils. Therefore, impacts associated with expansive soils would be less than significant.

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

**No Impact.** The Project would include an on-site septic tank to treat wastewater generated on-site. Septic tanks installed in the County are subject to Section 33.0890 *et seq.*, Liquid Waste Disposal, of the San Bernardino County Code, which requires issuance of a permit by the San Bernardino County Department of Environmental Health Services for the construction of a private septic system and sets forth requirements for the siting and construction of private septic systems.

Prior to issuance of a permit, the San Bernardino County Department of Environmental Health Services will review the proposed septic system to ensure on-site soils would be capable of supporting such a system. As part of the project entitlement process, the project applicant will comply with the County's Sanitation Permit process and submit proposed plans, as well as a soil percolation report, to the County Department of Environmental Health Services for review and approval. Compliance with this process will ensure that adverse impacts associated with on-site soils and septic systems do not occur. Therefore, impacts associated with the underlying soils' ability to support septic systems would be less than significant.

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

**Less-than-Significant Impact with Mitigation Incorporated.** A significant impact may occur if grading or excavation activities would disturb paleontological resources within the

project site. Surface sediments in the greater project area are composed of younger Quaternary Alluvium, derived broadly as alluvial fan deposits from the San Gabriel Mountains to the north via Lytle Creek that currently flows to the northeast. Younger Quaternary alluvial fan deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers, and there are no fossil vertebrate localities very nearby from these types of deposits. Moreover, project site has been subject to previous ground disturbing activities that have affected the entirety of the project site, and as such, it follows that any paleontological resources that may have once been located on the project site could have been previously disturbed. However, the possibility of a paleontological discovery cannot be discounted. Accordingly, destruction of paleontological resources or unique geologic features during site-disturbing activities associated with construction of the proposed project is considered a potential significant impact. Therefore, MM-GEO-1 is provided and would be implemented to ensure potential impacts during construction activities to paleontological resources or unique geologic features are reduced to a less-than-significant level.

**MM-GEO-1:** In the event that paleontological resources (fossil remains) are exposed during construction activities for the proposed project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology’s 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology’s 2010 guidelines and shall be subject to review and approval by the County of San Bernardino. Work in the area of the find may only resume upon approval of a qualified paleontologist.

**Therefore, with implementation of MM-GEO-1, no significant adverse impacts are anticipated.**

### VIII. Greenhouse Gas Emissions

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	of reducing the emissions of greenhouse gases?				
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**SUBSTANTIATION:**  
 San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Air Quality and GHG Emissions Attachments (Appendix A)

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

**Less-than-Significant Impact.** Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth’s temperature depends on the balance between energy entering and leaving the planet’s system, and many factors (natural and human) can cause changes in Earth’s energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth’s surface. The greenhouse effect is a natural process that contributes to regulating the Earth’s temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth’s surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state’s primary GHG emissions reduction programs, GHGs include CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>) (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, because these are the only GHG gases that would be emitted during project construction and/or operations.

Gases in the atmosphere can contribute to climate change both directly and indirectly.<sup>6</sup> The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO<sub>2</sub>; therefore, GWP-weighted emissions are measured in metric tons of CO<sub>2</sub> equivalent (MT CO<sub>2</sub>e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH<sub>4</sub> is 25 (emissions of 1 MT of CH<sub>4</sub> are equivalent to emissions of 25 MT of CO<sub>2</sub>), and the GWP for N<sub>2</sub>O is 298, based on the IPCC’s Fourth Assessment Report (IPCC 2007). As discussed in Section III of this Initial Study/Mitigated Negative Declaration, the proposed project is located within the jurisdictional boundaries of the SCAQMD. In

<sup>6</sup> Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo).

October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its Draft Guidance Document – Interim CEQA GHG Significance Threshold (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association (CAPCOA), explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO<sub>2</sub>e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1.** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2.** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3.** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO<sub>2</sub>e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO<sub>2</sub>e per year), commercial projects (1,400 MT CO<sub>2</sub>e per year), and mixed-use projects (3,000 MT CO<sub>2</sub>e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO<sub>2</sub>e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4.** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO<sub>2</sub>e per-service population for project-level analyses and 6.6 MT CO<sub>2</sub>e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5.** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the State CEQA Guidelines specifies that “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” The State CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency’s discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the project’s potential to generate GHG emissions that would have a significant impact on the environment, the project’s GHG emissions are compared to the quantitative threshold of 3,000 MT CO<sub>2</sub>e per year. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). Thus, this impact analysis compares estimated operational emissions plus amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year.

#### Short-Term Construction Emissions

Construction of the proposed project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. A depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 15 and in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 15 presents construction GHG emissions for the proposed project from on-site and off-site emissions sources.

Table 15. Estimated Annual Construction GHG Emissions

Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	<i>Metric Tons per Year</i>			
2022	677.05	0.10	0.00	679.47
2023	85.64	0.01	0.00	85.98
<b>Total</b>				<b>765.45</b>
<b>Amortized Emissions (over 30 years)</b>				<b>25.52</b>

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent. See Appendix A for complete results.

As shown in Table 15, the estimated total GHG emissions in 2022 and 2023 would be approximately 679 MT CO<sub>2</sub>e and 86 MT CO<sub>2</sub>e respectively. Amortized over 30 years, construction GHG emissions would be approximately 26 MT CO<sub>2</sub>e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis in the following text.

### **Long-Term Operational Emissions**

CalEEMod version 2016.3.2 was used to estimate potential project-generated operational GHG emissions from area sources (landscape maintenance), energy sources (natural gas and electricity), mobile sources, solid waste, water supply and wastewater treatment, offroad, and stationary sources. For additional details, see Section III for a discussion of operational emission calculation methodology and assumptions, specifically for area and energy (natural gas) sources. Year 2024 was assumed as the first full year of operations after project construction. Operational year 2020 was assumed for the existing uses.

Annual electricity emissions were estimated in CalEEMod using the default emissions factors for SCE, which would be the energy source provider for the proposed project. In addition, for electricity, the CO<sub>2</sub> intensities for the proposed project were adjusted based on the value reported in the SCE 2018 Power Content Label, including 36% renewables (SCE 2019).

Supply, conveyance, treatment, and distribution of water for the project require the use of electricity, which would result in associated indirect GHG emissions. Similarly, wastewater generated by the proposed project requires the use of electricity for conveyance and treatment, along with GHG emissions generated during wastewater treatment. Water consumption estimates for both indoor and outdoor water use and associated electricity consumption were estimated using CalEEMod default values. It was assumed the project would support use of a septic tank where sewers are not available for the disposal of wastewater.

Regulatory measures related to mobile sources include AB 1493 (Pavley) and related federal standards. AB 1493 required that CARB establish GHG emission standards for automobiles, light-duty trucks, and other vehicles determined by CARB to be vehicles that are primarily used for noncommercial personal transportation in the state. In addition, the National Highway Traffic Safety Administration and U.S. Environmental Protection Agency have established corporate fuel economy standards and GHG emission standards, respectively, for automobiles and light-, medium-, and heavy-duty vehicles. Implementation of these standards and fleet turnover (replacement of older vehicles with newer ones) will gradually reduce emissions from the proposed project's motor vehicles throughout project operation.

The proposed project would also generate solid waste and would result in CO<sub>2</sub>e emissions associated with landfill off-gassing. CalEEMod default values for solid waste generation were used to estimate GHG emissions associated with solid waste.

Table 16 presents the annual GHG emissions associated with operation of the proposed project. Additional details are included in Appendix A.

Table 16. Table Estimated Annual Operational GHG Emissions

Emission Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
<i>Existing Scenario</i>				
Area	<0.01	0.00	0.00	<0.01
Energy	34.89	<0.01	<0.01	35.06
Mobile	3,049.96	0.04	0.39	3,165.76
Waste	1.72	0.10	0.00	4.27
Water	6.38	0.05	<0.01	8.06
<i>Total</i>	<i>3,092.95</i>	<i>0.19</i>	<i>0.39</i>	<i>3,213.15</i>
<i>Proposed Project</i>				
Area	0.01	<0.01	0.00	0.01
Energy	150.25	0.01	<0.01	150.82
Mobile	2,517.75	0.02	0.34	2,620.19
Waste	39.99	2.36	0.00	99.08
Water	136.80	9.30	0.03	378.95
Offroad	849.23	0.27	0.00	856.10
Stationary	26.08	<0.01	0.00	26.17
<i>Total</i>	<i>3,720.11</i>	<i>11.96</i>	<i>0.37</i>	<i>4,131.32</i>
<i>Net Change in Emissions</i>				
<b>Net Change (Proposed Project – Existing Scenario)</b>				<b>918.17</b>
<i>Amortized Construction Emissions</i>				<i>25.52</i>
<b>Total Net Operational + Amortized Construction GHGs</b>				<b>943.69</b>

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent  
See Appendix A for detailed results.

The proposed project emissions reflect operational year 2024.

The existing scenario emissions reflect operational year 2020.

Values of “<0.01” indicate that the estimated emissions are less than two decimals. Totals may not sum due to rounding.

As shown in Table 16, the estimated annual project-generated GHG emissions would be approximately 4,131 MT CO<sub>2</sub>e per year as a result of project operation. As the existing uses are estimated to generate 3,213 MT CO<sub>2</sub>e per year, the net change in emissions is estimated to be 918 MT CO<sub>2</sub>e per year. When summed with the amortized project construction emissions, the total annual GHGs would be approximately 944 MT CO<sub>2</sub>e per year. Annual operational GHG emissions with amortized construction emissions would not exceed the SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year. Therefore, the proposed project’s GHG contribution would be less than significant.

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

**Less-than-Significant Impact.** The San Bernardino Council of Governments (SBCOG) (previously under the San Bernardino Associated Governments [SANBAG]) developed and adopted a GHG Emissions Reduction Plan (GHG Plan) in September 2011 and updated it in March 2014. Notably, SBCOG has completed a draft update to their GHG Plan in February 2021. The draft GHG Plan updates the prior plan with the 2016 GHG emissions inventory, 2030 GHG emissions forecast, reduction goal, GHG reduction measures, and related General Plan policies or other ongoing programs in the jurisdiction. Targets included in the GHG Plan includes a range of custom levels between 25% and 46% below 2008 levels, 40% below 2016 GHG emissions levels, 36% to 42% below 2020 business-as-usual (BAU), or several per capita emissions levels (SBCOG 2021).

The GHG Plan also includes GHG reduction measures aimed to reduce emissions generated during construction and/or operation of projects. The proposed project could incorporate applicable local measures regarding building energy, on-road transportation, off-road equipment, solid waste, and water and wastewater. The proposed project would not conflict with implementation of the SBCOG Regional GHG Reduction Plan.

The project would not impede the attainment of the most recent State GHG reduction goals identified in SB 32 and Executive Order (EO) S-3-05. SB 32 establishes a statewide goal of reducing GHG emissions to 40% below 1990 levels by 2030 while EO S-3-05 establishes a statewide goal of reducing GHG emissions to 80% below 1990 levels by 2050. While there are no established protocols or thresholds of significance for that future year analysis; CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that “California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014, p. ES2). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states the following (CARB 2014, p. 34):

This level of reduction is achievable in California. In fact, if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80% below 1990 levels by 2050. Additional measures, including locally driven measures and those necessary to meet federal air quality standards in 2032, could lead to even greater emission reductions.

In other words, CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, EO B-30-15, and EO S-3-05. This is confirmed in the 2017 Scoping Plan which states the following (CARB 2017):

The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

In addition, the specific path to compliance for the state in regards to the long-term, future goals will likely require development of new technology or other changes that are not currently known or available. As such, identifying ways that the project would be consistent with future goals would be speculative and cannot be meaningfully discussed at this time. However, the proposed project’s consistency with current goals, policies, and regulations would assist in meeting the County’s contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40 percent reduction target by 2030 and the EO S-3-05 80 percent reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the above considerations, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant, and no mitigation is required.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

## IX. Hazards and Hazardous Materials

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Stantect Phase I Environmental Site Assessment (Appendix D-1); Partner Phase I Environmental Site Assessment (Appendix D-2); Partner Additional Phase II Subsurface Investigation Report (Appendix D-3)

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

**Short-Term Construction Impacts**

**Less-than-Significant Impact with Mitigation Incorporated.** In December 2020, a Phase I Environmental Site Assessment (ESA; Appendix D-1) was prepared by Stantec to characterize the potential hazards associated with the historical and current uses of the project site and surrounding areas. This report was based in part on a Phase I ESA prepared by Partner Engineering and Science, Inc. in September 2019.

According to these reports, historical uses of the project site included agricultural uses as early as 1898 until the site was developed in the 1970s with industrial uses. Since then, the project site has been used for several industrial purposes including wrecking yards, dismantling salvage yards, truck/trailer repair, recycling, and a wood recycling center. Former tenants used and generated hazardous material and hazardous waste. Over the years, the San Bernardino County Fire Department (SBCFD) has issued violations to former tenants for improper handling of hazardous substances and improper labeling of hazardous containers. Additionally, the Partner Phase I ESA referenced previous site investigations that documented subsurface impacts throughout the site associated with VOCs, total petroleum hydrocarbons, and metals. The Partner Phase I ESA identified impacts as a recognized environmental condition, indicating that they may pose a threat to the environment.

Based on the findings of the Partner Phase I ESA, an Additional Phase II Subsurface Investigation Report (Appendix D-2) was prepared in February 2020 to further assess the existing subsurface impacts and determine if off-site removal of soils would be required for redevelopment. Over the course of these investigations, a total of 93 soil samples were analyzed for VOCs, total petroleum hydrocarbon, and metals, and 62 soil gas samples were analyzed for VOCs at a state-certified laboratory.

Based on the results of the soil analysis, Partner concluded current and future project site conditions do not pose a significant health risk to commercial/industrial workers or construction workers onsite and that mitigation measures to prevent exposure to intrusion of soil vapor, such as vapor barrier installation beneath buildings prior to construction, are not warranted. However, in order to ensure soils are appropriately managed during construction, Partner recommended development and implementation of a soil management plan during ground disturbing activities. Additionally, Partner recommended that if soil were to be removed from the project site, the waste characterization data from the hazardous materials investigation should be provided to the selected disposal facility.

Partner also noted that in general, VOC impacts to soil gas exceeded commercial/industrial screening levels (but not regulatory screening levels that would warrant further action) primarily in the central and southeastern portions of the project site. However, the upper 10 feet of soil at the project site would be re-worked and the entire habitable portion of the project site would either be capped with concrete or asphalt. With these measures in place, Partner concluded that no further action would be warranted regarding soil vapor at the project given the proposed project's design plan. In order to ensure that these measures are effectively implemented, they have been integrated into MM-HAZ-1, which will ensure that the project applicant takes the appropriate steps to mitigate the effects of previous subsurface contamination. Implementation of MM-HAZ-1 would ensure that previous contamination would not result in adverse health and safety impacts to workers during construction of the project or to future occupants of the site. Additionally, the project applicant has entered into a voluntary cleanup agreement with the Department of Toxic Substances Control to ensure that activities taken to mitigate subsurface contamination are coordinated with and overseen by the agency.

In addition, the Partner and Stantec Phase I ESAs noted that due to the age of the on-site buildings and structures, it is likely that asbestos-containing materials (ACM) and lead-based paints, as well as other building materials containing lead (e.g., ceramic tile), were

used in their construction. Demolition of these buildings and structures can cause encapsulated ACM (if present) to become friable and, once airborne, it would be considered a carcinogen.<sup>7</sup> A carcinogen is a substance that causes cancer or helps cancer grow. Demolition of the existing buildings and structures can also cause the release of lead into the air if not properly removed and handled. The EPA has classified lead and inorganic lead compounds as "probable human carcinogens" (EPA 2020). Such releases could pose significant risks to persons living and working in and around the project area, as well as to project construction workers.

Abatement of all ACM and lead-based paints encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of EPA (which regulates disposal), OSHA, the U.S. Department of Housing and Urban Development, the California OSHA (which regulates employee exposure), and SCAQMD.

For example, the EPA requires that all asbestos work performed within regulated areas be supervised by a person who is trained as an asbestos supervisor (EPA Asbestos Hazard Emergency Response Act, Title 40 of the Code of Federal Regulations Section 763). SCAQMD's Rule 1403 requires that buildings undergoing demolition or renovation be surveyed for ACM prior to any demolition or renovation activities (SCAQMD 2007). Should ACM be identified, Rule 1403 requires that ACM be safely removed and disposed of at a regulated disposal site, if possible. If it is not possible to safely remove ACM, Rule 1403 requires that safe procedures be used to demolish the building with asbestos in place without resulting in a significant release of asbestos to the environment. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations Section 1529 (Asbestos), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practices by workers exposed to asbestos.

California Occupational Safety and Health Administration Regulation 29 (CFR Standard 1926.62) regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead and the safe demolition of buildings containing lead-based paints or other lead materials. Additionally, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of Title 8 of the California Code of Regulations Section 1532.1 (Lead), which provides for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead.

Mandatory compliance with these regulatory requirements would ensure that construction workers and the public are not exposed to significant ACM or lead-based paint health hazards during demolition and/or during transport of demolition waste to an appropriate disposal facility, and would ensure that impacts related to ACM and lead-based paint remain less than significant.

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<sup>7</sup> When dry, an ACM is considered friable if it can be crumbled, pulverized, or reduced to powder by hand pressure. If it cannot, it is considered non-friable ACM. It is possible for non-friable ACM to become friable when subjected to unusual conditions, such as demolishing a building or removing an ACM that has been glued into place.

Upon completion of soil remediation efforts in compliance with MM-HAZ-1 and demolition activities in compliance with regulatory requirements, potentially hazardous materials would likely be handled on the project site as part of project construction. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including EPA, the California Department of Toxic Substances Control, the California OSHA, Caltrans, the Resource Conservation and Recovery Act, the SCAQMD, and the San Bernardino County Certified Unified Program Agency. Therefore, with implementation of MM-HAZ-1 and with compliance with applicable regulations, short-term construction impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

**MM-HAZ-1** The project design shall incorporate the site work detailed in the Additional Phase II Subsurface Investigation Report prepared by Partner Engineering and Science, Inc., in February 2020, or any updates to that report. This site work shall include re-working the upper 10 feet of soil in areas planned for habitation and placing an asphalt or concrete cap above those areas. Additionally, the project applicant shall prepare and implement a soil management plan during construction to appropriately handle on-site soils. If soils are to be transported off-site, receiving facilities shall be provided with all documents relating to previous site investigations, including the Additional Phase II Subsurface Investigation Report.

### **Long-Term Operational Impacts**

**Less-than-Significant Impact.** Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2020). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the County, and any handling, transport, use, and disposal would comply with applicable

federal, state, and local agencies and regulations. Further, as mandated by OSHA (OSHA 2020), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release. Therefore, long-term operational impacts associated with hazardous materials would be less than significant.

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

### **Short-Term Construction Impacts**

**Less-than-Significant Impact with Mitigation Incorporated.** As discussed in response (a), Partner concluded current and future project site conditions do not pose a significant health risk to commercial/industrial workers or construction workers onsite and that mitigation measures to prevent exposure to intrusion of soil vapor, such as vapor barrier installation beneath buildings prior to construction, are not warranted. However, in order to ensure soils are appropriately managed during construction, Partner recommended development and implementation of a soil management plan during ground disturbing activities. Additionally, Partner recommended that if soil were to be removed from the project site, the waste characterization data from the hazardous materials investigation should be provided to the selected disposal facility.

Partner also noted that in general, VOC impacts to soil gas exceeded commercial/industrial screening levels (but not regulatory screening levels that would warrant further action) primarily in the central and southeastern portions of the project site. However, the upper 10 feet of soil at the project site would be re-worked and the entire habitable portion of the project site would either be capped with concrete or asphalt. With these measures in place, Partner concluded that no further action would be warranted regarding soil vapor at the project given the proposed project's design plan. In order to ensure that these measures are effectively implemented, they have been integrated into MM-HAZ-1, which will ensure that the project applicant takes the appropriate steps to mitigate the effects of previous subsurface contamination. Implementation of MM-HAZ-1 would ensure that previous contamination would not result in adverse health and safety impacts to workers during construction of the project or to future occupants of the site. Additionally, the project applicant has entered into a voluntary cleanup agreement with the Department of Toxic Substances Control to ensure that activities taken to mitigate subsurface contamination are coordinated with and overseen by the agency.

In addition, the Partner and Stantec Phase I ESAs noted that due to the age of the on-site buildings and structures, it is likely that asbestos-containing materials (ACM) and lead-based paints, as well as other building materials containing lead (e.g., ceramic tile), were used in their construction. Demolition of these building and structures can cause encapsulated ACM (if present) to become friable and, once airborne, it would be

considered a carcinogen.<sup>8</sup> A carcinogen is a substance that causes cancer or helps cancer grow. Demolition of the existing buildings and structures can also cause the release of lead into the air if not properly removed and handled. The EPA has classified lead and inorganic lead compounds as "probable human carcinogens" (EPA 2020). Such releases could pose significant risks to persons living and working in and around the project area, as well as to project construction workers.

Abatement of all ACM and lead-based paints encountered during any future building demolition activities would be required to be conducted in accordance with all applicable laws and regulations, including those of EPA (which regulates disposal), OSHA, the U.S. Department of Housing and Urban Development, the California OSHA (which regulates employee exposure), and SCAQMD.

Mandatory compliance with these regulatory requirements would ensure that construction workers and the public are not exposed to significant ACM or lead-based paint health hazards during demolition and/or during transport of demolition waste to an appropriate disposal facility, and would ensure that impacts related to ACM and lead-based paint remain less than significant.

Upon completion of soil remediation efforts in compliance with MM-HAZ-1 and demolition activities in compliance with regulatory requirements, potentially hazardous materials would likely be handled on the project site as part of project construction. These materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products required to operate and maintain construction equipment. Handling of these potentially hazardous materials would be temporary and would coincide with the short-term construction phase of the project.

Although these materials would likely be stored on the project site, storage would be required to comply with the guidelines set forth by each product's manufacturer and with all applicable federal, state, and local regulations pertaining to the storage of hazardous materials. Consistent with federal, state, and local requirements, the transport of hazardous materials to and from the project site would be conducted by a licensed contractor. Any handling, transport, use, or disposal of hazardous materials would comply with all relevant federal, state, and local agencies and regulations, including EPA, the California Department of Toxic Substances Control, the California OSHA, Caltrans, the Resource Conservation and Recovery Act, the SCAQMD, and the San Bernardino County Certified Unified Program Agency. Therefore, with implementation of MM-HAZ-1 and with compliance with applicable regulations, short-term construction impacts related to the foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

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<sup>8</sup> When dry, an ACM is considered friable if it can be crumbled, pulverized, or reduced to powder by hand pressure. If it cannot, it is considered non-friable ACM. It is possible for non-friable ACM to become friable when subjected to unusual conditions, such as demolishing a building or removing an ACM that has been glued into place.

## Long-Term Operational Impacts

**Less-than-Significant Impact.** Potentially hazardous materials associated with project operations would include materials used during typical cleaning and maintenance activities. Although these potentially hazardous materials would vary, they would generally include household cleaning products, paints, fertilizers, and herbicides and pesticides. Many of these materials are considered household hazardous wastes, common wastes, and/or universal wastes by the EPA, which considers these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when properly handled, transported, used, and disposed of (EPA 2020). Federal, state, and local regulations typically allow these types of wastes to be handled and disposed of with less stringent standards than other hazardous wastes, and many of these wastes do not have to be managed as hazardous waste. Additionally, any potentially hazardous material handled on the project site would be limited in both quantity and concentrations, consistent with other similar industrial uses located in the County, and any handling, transport, use, and disposal would comply with applicable federal, state, and local agencies and regulations. Further, as mandated by OSHA (OSHA 2020), all hazardous materials stored on the project site would be accompanied by a Material Safety Data Sheet, which would inform employees and first responders as to the necessary remediation procedures in the case of accidental release. Therefore, long-term operational impacts associated with foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

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

**No Impact.** The nearest school to the project site is Redwood Elementary School (8570 Redwood Avenue), which is located over 0.3 miles east of the project site. Further, the project would neither create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor would it create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, no impacts associated with emitting or handling hazardous materials within 0.25 miles of a school would occur.

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

**Less-than-Significant Impact.** The project site is not included on any hazardous waste site lists, including the California Department of Toxic Substances Control's EnviroStor database, the State Water Resources Control Board's GeoTracker site, the Cortese list, or other lists compiled pursuant to Section 65962.5 of the Government Code (CalEPA 2020; DTSC 2020; SWRCB 2020a). The closest site included on hazardous waste site list is an active voluntary cleanup site located approximately 350 feet east of the project site (DTSC 2020). As determined in the Phase I and Phase II site investigations, contamination on this nearby site has not affected the project site (Appendices D-1 and D-2). Therefore, impacts associated with hazardous materials sites would be less than significant.

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

**No Impact.** No private airstrips are located in the project area. The nearest operational public-use airport to the project site is Ontario International Airport, which is located approximately 5 miles west, well outside of the project area. Therefore, no impacts associated with airport hazards would occur.

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

**Less-than-Significant Impact.** In the event of an emergency, the following roads and highways would serve as evacuation routes in the Valley Region of the County: Interstates 10, 15, 210, 215; State Highways 30, 60, 66, and 83; and numerous major and second highways (County of San Bernardino 2007b). Additionally, Caltrans has identified a number of "potential evacuation routes" in the Valley Region. The closest "potential evacuation route" to the project site would be San Bernardino Avenue approximately 1-mile south of the project site. Project construction may result in the closure of a lane within this roadway; however, any construction-period lane closure would be short-term, and the lanes would reopen upon completion of construction activities. Moreover, standard traffic control practices would be employed to manage and direct traffic around closures in the event of an emergency. Therefore, impacts associated with emergency response and evacuation routes would be less than significant.

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

**Less-than-Significant Impact.** The project site is located in a highly developed part of the County outside of an urban-wildland interface. Maps provided by CAL FIRE show the project site would be located in a local responsibility area; however, the project site would not be located within or near state responsibility areas or lands classified as very high fire

hazard severity zones (CAL FIRE 2008), and the nearest natural open space area is found more than 1 mile south of the site. Given the considerable distance between the project site and the nearest wildland-urban interface, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impacts associated with wildland fire would occur.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

## X. Hydrology and Water Quality

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii. create or contribute runoff water which would	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
	exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff; or				
	iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

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

**Less-than-Significant Impact.** Construction of the project would include earthwork activities that could potentially result in erosion and sedimentation, which could subsequently degrade downstream receiving waters and violate water quality standards. Stormwater runoff during the construction phase may contain silt and debris, resulting in a short-term increase in the sediment load of the municipal storm drain system. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the project site and subsequently conveyed via stormwater to nearby drainages, watersheds, and groundwater.

For stormwater discharges associated with construction activity in the State of California, the State Water Resources Control Board (SWRCB) has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities (SWRCB 2020b). The Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which would include and specify water quality BMPs designed to prevent pollutants from contacting

stormwater and keep all products of erosion from moving off site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the SWRCB.

Because land disturbance for project construction activities would exceed one acre, the project applicant would be required to obtain coverage under the Construction General Permit issued by the SWRCB prior to the start of construction within the project site. Specifically, the Construction General Permit requires that the following be kept on-site at all times: (i) a copy of the Notice of Intent to Comply with Terms of the General Permit to Discharge Water Associated with Construction Activity; (ii) a waste discharge identification number issued by the SWRCB; (iii) a SWPPP and Monitoring Program Plan for the construction activity requiring the construction permit; and (iv) records of all inspections, compliance and non-compliance reports, evidence of self-inspection, and good housekeeping practices.

The SWPPP requires the construction contractor to implement water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas do not cause degradation of water quality in receiving water bodies. The SWPPP must describe the type, location, and function of stormwater BMPs to be implemented, and must demonstrate that the combination of BMPs selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in Construction General Permit.

As such, through compliance with the Construction General Permit, the project would not adversely affect water quality. Therefore, short-term construction impacts associated with water quality would be less than significant.

With respect to project operation, future uses on-site that could contribute pollutants to stormwater runoff in the long term include uncovered parking areas (through small fuel and/or fluid leaks), uncovered refuse storage/management areas, landscape/open space areas (if pesticides/herbicides and fertilizers are improperly applied), and general litter/debris (e.g., generated during facility loading/unloading activities). During storm events, the first few hours of moderate to heavy rainfall could wash a majority of pollutants from the paved areas where, without proper stormwater controls and BMPs, those pollutants could enter the municipal storm drain system before eventually being discharged to adjacent waterways. The majority of pollutants entering the storm drain system in this manner would be dust, litter, and possibly residual petroleum products (e.g., motor oil, gasoline, diesel fuel). Certain metals, along with nutrients and pesticides from landscape areas, can also be present in stormwater runoff. Between periods of rainfall, surface pollutants tend to accumulate, and runoff from the first significant storm of the year ("first flush") would likely have the largest concentration of pollutants.

Stormwater quality within the Santa Ana Region (of which the project site is a part) is managed by the Santa Ana Regional Water Quality Control Board, which administers the National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the incorporated Cities of San Bernardino County within the Santa Ana Region (MS4 Permit). The MS4 Permit covers 17 cities and most of the unincorporated

areas of San Bernardino County (including the project site) within the jurisdiction of the Santa Ana RWQCB. Under the MS4 Permit, the San Bernardino County Flood Control District is designated as the Principal Permittee. The Co-Permittees are the 17 San Bernardino County cities and San Bernardino County. The MS4 Permit requires Permittees and Co-Permittees, to implement a development planning program to address stormwater pollution. These programs require project applicants for certain types of projects to implement a WQMP throughout the operational life of each projects. The purpose of a WQMP is to reduce the discharge of pollutants in stormwater and to eliminate increases in pre-existing runoff rates and volumes by outlining BMPs, which must be incorporated into the design plans of new development and redevelopment (SARWQCB 2010).

Per the MS4 Permit, and as described in the Water Quality Management Plan for the Santa Ana Region of San Bernardino County, a project-specific WQMP is required to manage the discharge of stormwater pollutants from development projects to the “maximum extent practicable” (County of San Bernardino 2013). The maximum extent practicable is the standard for control of stormwater pollutants, as set forth by Section 402(p)(3)(iii) of the Clean Water Act. However, the Clean Water Act does not quantitatively define the term maximum extent practicable. As implemented, maximum extent practicable varies with conditions. In general, to achieve the maximum extent practicable standard, permittees and co-permittees must require deployment of whatever BMPs are technically feasible (that is, are likely to be effective) and are not cost prohibitive. To achieve fair and effective implementation, criteria and guidance for those controls must be detailed and specific, while also offering the right amount of flexibility or exceptions for special cases. A project-specific WQMP’s compliance with the requirement to achieve the maximum extent practicable standard is documented within the project-specific WQMP through the completion of worksheets that document the feasibility or infeasibility of the deployment of BMPs.

As a Co-Permittee subject to the MS4 permit, the County is responsible for ensuring that all new development and redevelopment projects comply with the MS4 Permit (County of San Bernardino 2020b).

At this point in time, the project’s final stormwater management system has not yet been fully designed (and will likely be completed during the final engineering phase). However, as required by the MS4 Permit, the project will be required to manage and treat stormwater flows to maximum extent practicable to control pollutants, pollutant loads, and runoff volume emanating from the project site by: (1) minimizing the impervious surface area and implementing source control measures, (2) controlling runoff from impervious surfaces using structural BMPs (e.g., infiltration, bioretention, and/or rainfall harvest and re-use), and (3) ensuring all structural BMPs are monitored and maintained for the life of the project. As required by Section 85.15.030 of the County’s Development Code (2007), the quality control engineer will inspect the work in progress to ensure compliance with the condition of approval for the project’s WQMP’s site design, source control and treatment control features (County of San Bernardino 2007a).

In addition, industrial facilities such as manufacturers, landfills, mining, steam generating electricity, hazardous waste facilities, transportation with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities are required to obtain coverage under the Statewide General Permit for Storm Water Discharges Associated with

Industrial Activities, Order 2014-0057-DWQ (Industrial General Permit), which implements the federally required stormwater regulations in the state for stormwater associated with industrial activities. If the future end users of the project site propose to operate a building as an industrial facility that would be required to obtain coverage under the Industrial General Permit, the end user would be required to seek coverage under the Industrial General Permit, which involves preparing a SWPPP for operational activities and the implementation of a long-term water quality sampling and monitoring program unless an exemption is granted. Mandatory compliance with the Industrial General Permit would further reduce water quality impacts during long-term operation of the project to below a level of significance.

With respect to groundwater quality, the project would be required (via compliance with the MS4 Permit) to include BMPs that would allow for stormwater to be collected and treated in bio-filtration basins. Depending on the subgrade layers that underlie a project site, these BMPs may be designed to allow for stormwater flows to infiltrate soils and recharge groundwater. During the final engineering phase, the proposed locations for the structural BMPs will be thoroughly tested for potential infiltration opportunities and will be implemented if possible. If determined to be feasible, the structural BMPs would treat stormwater flows prior to infiltration, ensuring that flows infiltrating groundwater aquifers do not result in adverse effects to groundwater quality. Moreover, flows entering these structural BMPs, if implemented as infiltration locations, would be typical of runoff collected from a commercial development and would not contain substantial quantities of pollutants that could not be appropriately treated by the proposed BMPs.

In summary, project grading and construction would be completed in accordance with a National Pollutant Discharge Elimination System-mandated SWPPP, which would include standard BMPs to reduce potential off-site water quality impacts related to erosion and incidental spills of petroleum products and hazardous substances from equipment. Surface water runoff during project operations would be managed through a mixture of strategies that would be designed to remove pollutants from on-site runoff prior to discharge into the storm drain system to the maximum extent practicable, as required by MS4 and as will be demonstrated in the project-specific WQMP. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and water quality impacts would be less than significant.

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

### ***Groundwater Supplies***

**Less-than-Significant Impact.** The project would be served with potable water from the Fontana Water Company (FWC), and the project applicant does not propose the use of any wells or other groundwater extraction activities. As such, the project would not directly draw water from the groundwater table; however, according to FWC's 2015 Urban Water Management Plan (UWMP) (FWC 2016), FWC currently obtains water from three different sources: local groundwater basins (primarily Chino Basin), local surface water, and

imported surface water. Therefore, the project may rely on water supplies that would be composed, at least in part, of groundwater

FWC pumps groundwater from 15 active wells within the Chino Basin. These wells have a combined capacity of approximately 31,007 gallons per minute. FWC has the legal right to pump groundwater from the Chino Basin pursuant to the 1978 Chino Basin Court Adjudication under the Chino Basin Judgment. The Chino Basin Judgment provides groundwater management that allows use of groundwater supplies to meet overlying water demands and provides a mechanism to fund purchases of untreated imported water to replenish the groundwater basin that supplements recharge with local stormwater. The Chino Basin Judgment permits the Chino Basin Watermaster to levy and collect annual assessments in amounts sufficient to purchase replenishment water to replace production during the preceding year that exceeds that allocated share of safe yield/operating safe yield (FWC 2016).

FWC currently owns appropriative rights based on a 0.002% share of the operating safe yield, and Fontana Union Water Company, of which FWC is a principal shareholder, currently owns appropriative rights based on an 11.66% share of the operating safe yield. Appropriators who are parties of the Chino Basin Judgment, such as FWC, are authorized to extract groundwater in excess of the allocated quantities. Appropriators pay an assessment for such extractions to the Chino Basin Watermaster. The assessments are used to purchase untreated imported water to replenish the Chino Basin through imported surface water recharge. Water to replenish the Chino Basin is purchased from the Metropolitan Water District of Southern California by Inland Empire Utilities Agency in cooperation with the Chino Basin Watermaster (FWC 2016).

FWC also pumps groundwater from four active wells within the Rialto Basin and three active wells within the No Man's Land Basin (unnamed basin located between the Chino and Rialto Basins), neither of which are subject to production restrictions, although extractions in some years may be affected by the groundwater elevations. The No Man's Land Basin wells have a capacity of approximately 3,314 gallons per minute and the Rialto Basin wells are subjected to unrestricted pumping in most years pursuant to the 1961 Rialto-Colton Basin Court Decree (FWC 2016).

Further, FWC extracts groundwater from 10 active wells within Lytle Basin Creek, which have a combined capacity of approximately 3,700 gallons per minute. The 1897 McKinley Decree, which specifies surface water allocations, and the January 28, 1924, judgment by the Superior Court for the County of San Bernardino, which confirms the McKinley Decree and specifies allowed groundwater diversions, allow Fontana Union Water Company and FWC to divert surface water and pump groundwater from the Lytle Creek Region up to a maximum of approximately 50,400 acre-feet per year, including up to approximately 36,200 acre-feet per year of allowable combined surface and groundwater extractions to augment deficiencies in surface water diversions. FWC is allowed to extract and divert a combined approximately 18,800 acre-feet per year of groundwater from the Lytle Creek region (FWC 2016).

Groundwater levels within these basins are both individually and collectively monitored by their respective watermasters to prevent future overdraft of the groundwater basins. Legal, regulatory, and other mechanisms are currently in place to ensure that the amount of

groundwater pumped in the broader project region does not exceed safe yields/operating safe yields. Thus, although the project would rely on water supplies that would be composed, at least in part, of groundwater, all extraction of groundwater for use by FWC is actively managed to prevent overdraft, ensure the long-term reliability of the groundwater basins, and avoid adverse effects to groundwater supplies.

With respect to groundwater recharge, the project site is a relatively small, partially developed site. Under the existing condition, the project site does not allow for significant groundwater recharge and does not share any characteristics with locations typically associated with groundwater recharge (e.g., earthen bottom creeks and streams, lakes, and spreading basins). Following construction, the project site would contain landscape areas and other pervious surfaces that would allow for a percentage of water to percolate into the subsurface soils. Therefore, impacts associated with groundwater recharge would be less than significant.

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

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

**Less-than-Significant Impact.** The project would result in the demolition and removal of the existing asphalt and structures on the project site and the construction of new paved surfaces, a warehouse building, and landscape areas. The project would also include a new engineered stormwater drainage system that would feature structural BMPs such as retention facilities to treat and manage storm water flows before conveying them into the public storm drain system. While the project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent practicable, demolition and construction activities would inevitably result in changes to the internal drainage patterns of the site. However, the project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the current MS4 Permit adopted by the Santa Ana RWQCB. Per the requirements of the MS4 Permit, the project's WQMP would be required to demonstrate that the project's stormwater system can attenuate 2-year storm runoff flows (see discussion below for a discussion of the capacity of the stormwater system), thereby reducing the potential for the project to result in stormwater flows off-site that could result in erosion on or off site. Additionally, the project's structural BMPs would be designed such any potential sediments collected on-site are captured in retention facilities so that they would not be conveyed to downstream waters and result in siltation. As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater, such that they would not result in substantial erosion or siltation on or off site. Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

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

**Less-than-Significant Impact.** Under existing conditions, the project site is developed with asphalt areas and multiple structures. The project would result in the demolition and removal of the existing asphalt and structures on the project site and the construction of new paved surfaces, a warehouse building, and landscape areas. The project would include a new engineered stormwater drainage system that would feature structural BMPs such as retention facilities to treat and manage storm water flows before conveying them into the public storm drain system. While the project's future drainage conditions would be designed to mimic the existing on-site drainage conditions to the maximum extent practicable, demolition and construction activities would inevitably result in changes to the internal drainage patterns of the site. However, the project's future storm drain system will be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the current MS4 Permit adopted by the Santa Ana RWQCB. The MS4 Permit requires that projects be designed to attenuate a 2-year, 24-hour storm event. A project's WQMP would be required to demonstrate this capability using the methodology outlined in the Technical Guidance Document for Water Quality Management Plans (SARWQCB 2013). As discussed previously, the project's final stormwater management system has not yet been fully designed at this point in time (and will likely be completed during the final engineering phase). However, per Section 83.04.030 of the County Development Code, a quality control engineer will review the project's WQMP during the plan check process to ensure the project's future stormwater system is capable of stormwater flows such that flooding on or off site would not occur (County of San Bernardino 2007a). As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater. Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

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

**Less-than-Significant Impact.** As discussed above, the project would inevitably alter the drainage patterns of the project site; however, the project would include a new engineered stormwater drainage system that would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the current MS4 Permit adopted by the Santa Ana RWQCB. Per the requirements of the MS4 Permit, the project's WQMP will be required to demonstrate the future stormwater system can adequately treat and manage stormwater flows such that they would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Further, per Section 83.04.030 of the County Development Code, a quality control engineer will review the project's WQMP during the plan check process to ensure the project complies with all requirements of the MS4 Permit (County of San Bernardino 2007a).

As such, altering the on-site drainage pattern would be conducted in a manner consistent with all applicable standards related to the collection and treatment of stormwater. Therefore, impacts associated with altering the existing drainage pattern of the project site would be less than significant.

**iv) *impede or redirect flood flows?***

**Less-than-Significant Impact.** According to the Flood Insurance Rate Map No. 06071C8651H (FEMA 2020) for the project area, the majority of the project site is located within Zone X, which is defined by the Federal Emergency Management Agency as an area determined to be outside of the 0.2% annual chance floodplain. As such, the majority of the project site is not located within a flood hazard area. However, the southern portion of the project site is located in a Floodplain Overlay Zone, Zone AO, which is a regulatory floodway area (FEMA 2020). However, only a small portion of the project site and a minimal area of the proposed warehouse building would be located within Zone AO. The project would adhere to applicable development standards relating to construction materials and methods, grading, and other design requirements set forth in Section 82.14.040, Floodplain Safety Review Areas in the County Development Code (County of San Bernardino 2007a) and would adhere to specific standards set by the County Public Works Department and County Flood Control District to reduce impacts that could result to the project in the event of a flood. Therefore, impacts associated with flooding would be less than significant.

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

**Less-than-Significant Impact.** While a small portion of the project site is located in a FEMA-designated flood hazard zone, Zone AO, which is a regulatory floodway area, only a small portion of the proposed warehouse would be located in the aforementioned zone. Additionally, the project would be designed in conformance with development standards relating to construction materials and methods, grading, and other design requirements set forth in Section 82.14.040, Floodplain Safety Review Areas, in the County Development Code (County of San Bernardino 2021) and would adhere to specific standards set by the County Public Works Department and County Flood Control District to reduce impacts that could result to the project in the event of a flood. The project's septic system would be located entirely outside of the flood hazard zone, in conformance with San Bernardino County of Environmental Health Services requirements, to prevent the risk of release of pollutants during project inundation. Furthermore, the project site would not be located along the coast, and because of the lack of nearby large contained waterbody (e.g., a reservoir or similar), the project would not be susceptible to seiche, tsunami, or mudflow. Therefore, impacts associated with flood hazards, seiche, tsunami, would be less than significant.

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

**Less-than-Significant Impact.** See response to X(a) and (b).

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

### XI. Land Use and Planning

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

**a) *Would the project physically divide an established community?***

**No Impact.** The project site is located within an industrial area of the County. There are numerous existing industrial operations in areas to the north, east, and west, residential uses further to the north and northeast, and existing commercial operations to the south. The physical division of an established community is typically associated with the construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area. Currently, the project site is located within a largely industrial area of the County, and thus, is not used as a connection between two established communities. Instead, connectivity in the surrounding project area is facilitated via local roadways and pedestrian facilities. The project would not impede use of these facilities and would in fact include improvements such as new sidewalks that would improve pedestrian connectivity and safety along the project frontage. Therefore, no impacts associated with division of an existing community would occur.

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

**No Impact.** On October 27, 2020, the Countywide Plan was adopted as a traditional general plan for the County’s unincorporated communities. The Countywide Policy Plan is a component of the Countywide Plan that addresses the County’s municipal services and community planning for the unincorporated areas. The project site is located in unincorporated San Bernardino County; and thus, shall refer to the Countywide Plan for

land use designation and applicable land use goals and policies. According to the Countywide Policy Plan Land Use Map the land use designation for the project site is General Industrial (GI) (County of San Bernardino 2020b).

Additionally, according to the Land Use Categories Map in the Countywide Policy Plan, the project site is presently zoned Regional Industrial (IR) (County of San Bernardino 2020b). With approval of a conditional use permit, the project would be a permitted use within the IR zone. Moreover, the project represents a logical continuation of industrial development in this part of the County. As such, the project would be consistent with both the Countywide Policy Plan land use designation and General Plan zoning district.

### Countywide Policy Plan

The Countywide Policy Plan Land Use Element contains several goals and policies that address land use and planning and are applicable to the project. An analysis of the project's consistency with these goals and policies is provided in Table 17.

Table 17. Policy Plan Consistency Analysis

Policy Plan Goal or Policy	Consistency Summary
<p><b>Goal LU 1. Fiscally Sustainable Growth.</b>                      Growth and development that builds thriving communities, contributes to our Complete County, and is fiscally sustainable.</p>	<p><b>No Conflict.</b> The project would be located in the Valley region of the County and would involve the development of an industrial use that is compatible with the existing zoning (IR) and designated land use (GI). During operation, the project would establish a jobs-producing and tax-generating industrial land use that would meet contemporary industry standards, can accommodate a wide variety of users, and is economically competitive with similar industrial buildings in the local area and region.</p>
<p><b>Policy LU 1.1. Growth.</b>                      We support growth and development that is fiscally sustainable for the County. We accommodate growth in the unincorporated county when it benefits existing communities, provides a regional housing option for rural lifestyles, or supports the regional economy.</p>	<p><b>No Conflict.</b> The project would involve the development of a high-quality and economically competitive facility that would be designed to meet the needs of a growing logistics sector. The project would be located in an established industrial area within the Valley region of the County and would be compatible with the existing zoning (IR) and designated land use (GI).</p>
<p><b>Policy LU 1.2. Infill Development.</b>                      We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available.</p>	<p><b>No Conflict.</b> Under existing conditions, the project site contains industrial land uses. The project site also includes several storage buildings and sheds. The proposed project would demolish the existing structures and construct a single, one-story industrial/warehouse building. Upon</p>

Table 17. Policy Plan Consistency Analysis

Policy Plan Goal or Policy	Consistency Summary
	completion of construction, the project would utilize the entirety of the project site and introduce a new industrial development to the area. As discussed in Section XV, Public Services and Section XIX, Utilities and Service Systems, the project site is already served by existing public services and infrastructure.
<p><b>Policy LU 1.5. Development impact fees.</b> We require payment of development impact fees to ensure that all new development pays its fair share of public infrastructure.</p>	<p><b>No Conflict.</b> Similar to other development projects in the County, the project would be subject to Senate Bill 50, which requires the payment of mandatory impact fees to offset any impact to school services or facilities (County of San Bernardino 2020a). These impact fees are required of most residential, commercial, and industrial development projects in the County.</p>
<p><b>Goal LU 2. Land Use Mix and Compatibility.</b> An arrangement of land uses that balances the lifestyle of existing residents, the needs of future generations, opportunities for commercial and industrial development, and the value of the natural environment.</p>	<p><b>No Conflict.</b> The project would involve the development of a high-quality industrial facility within an established industrial area. During operation, the project would be a jobs-producing and tax-generating land use that would support economic growth within the County, benefitting future generations.</p>
<p><b>Policy LU 2.1. Compatibility with existing uses.</b> We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.</p>	<p><b>No Conflict.</b> The project would be located within an established industrial area of the County and is consistent with the existing zoning (IR) and land use designation (GI). The project would be designed to be aesthetically consistent with existing development in both the immediate and broader project areas. The project would be consistent with all design standards described within the County’s 2007 Development Code. Moreover, development of the project on the project site would help concentrate non-residential uses near existing roadways, highways, and freeways in an effort to isolate and reduce any potential environmental impacts related to truck traffic congestion, air emissions, and industrial noise to the greatest extent feasible.</p>
<p><b>Policy LU 2.4. Land Use Map consistency.</b> We consider proposed development that is consistent with the Land Use Map (i.e., it</p>	<p><b>No Conflict.</b> The project site is located would be located within an established industrial area of the County and is consistent with the existing</p>

Table 17. Policy Plan Consistency Analysis

Policy Plan Goal or Policy	Consistency Summary
<p>does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity.</p>	<p>zoning (IR) and land use designation (GI). The project would be consistent with all design standards described within the County's 2007 Development Code. The project would be designed to be aesthetically consistent with existing development in both the immediate and broader project areas.</p>
<p><b>Policy LU 2.12. Office and industrial development in the Valley region.</b> We encourage office and industrial uses in the unincorporated Valley region in order to promote a countywide jobs-housing balance.</p>	<p><b>No Conflict.</b> The project would involve the development of an industrial use within the Valley region of the County. During operation, the project would employ approximately 100 people; thus, promoting a balanced jobs-housing ratio.</p>
<p><b>Policy LU 4.5. Community identity.</b> We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.</p>	<p><b>No Conflict.</b> The project site would be located within an established industrial area of the County and is consistent with the existing zoning (IR) and land use designation (GI). The project would be designed to be aesthetically consistent with existing development in both the immediate and broader project areas and would be consistent with all design standards described within the County's 2007 Development Code. The project would incorporate high-quality architectural elements similar to those of other new industrial/warehouse buildings in the surrounding area, including a neutral color palette and a variety of building materials, such as medium reflective panels and windows. Additionally, the project would incorporate a diverse landscape palate that would soften views of the project site and enhance the visual quality of the project.</p>
<p><b>Policy LU 4.7. Dark skies.</b> We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations</p>	<p><b>No Conflict.</b> Consistent with Chapter 83.07 (Glare and Outdoor Lighting) of the County's Code of Ordinances (County of San Bernardino 2021), 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. All exterior lighting would be</p>

Table 17. Policy Plan Consistency Analysis

Policy Plan Goal or Policy	Consistency Summary
	shielded/hooded to prevent light trespass onto nearby public right-of-way. Additionally, the project would use a variety of non-reflective building materials, and although some new reflective improvements (i.e., windows and building front treatments) would be introduced onto the project site, the project as a whole would not be considered a source of glare in the project area.

Source: County of San Bernardino 2020b

### Development Code

In compliance with County Development Code Section 82.06.060, Industrial and Special Purpose Land Use and Zoning District Site Planning and Building Standards, the project would adhere to applicable site layout and building standards such as density, setbacks, and height limit requirements defined for industrial uses in the Valley Region (County of San Bernardino 2007a). Additionally, because the southern portion of the project site would be located within a Floodplain Overlay Zone, the project would adhere to applicable development standards relating to construction materials and methods, grading, and other design requirements set forth in Section 82.14.040, Floodplain Safety Review Areas (County of San Bernardino 2007a). While an insignificant portion of the proposed warehouse structure would reside in the Floodplain Overlay Zone, the project would still adhere to the specific standards set by the County Public Works Department and County Flood Control District to reduce impacts that could result to the project in the event of a flood.

Therefore, because the project would be consistent with the goals and policies set forth in the Policy Plan Land Use Element and the project would adhere to applicable development standards set forth by the County Development Code, impacts associated with the project conflicting with a land use plan, policy, or regulation would not occur.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

## XII. Mineral Resources

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact	
Would the project:					
a)	Result in the loss of availability of a known mineral resource that will be of value to the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION: (Check  if project is located within the Mineral Resource Zone Overlay):

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

**Less-than-Significant Impact.** According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no gas, geothermal, or other known wells located on or in the vicinity of the project site; the nearest wells to the project site are located over 1 mile north and over 4 miles west within the City of Rancho Cucamonga (CDOC 2020c). Additionally, Policy Map NR-4, Mineral Resource Zones, in the Policy Plan, shows that the project site is located within an MRZ-2 area, which is an area containing mineral occurrences of mineral resource significance (County of San Bernardino 2020b). However, project site is located in an urbanized, industrial portion of the County and is bound by existing and future development in all directions. Mineral resource mining is not a compatible use with existing surrounding land uses. Therefore, impacts associated with mineral resources would be less than significant.

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

**Less-than-Significant Impact.** The project site is not large enough to extract mineral resources effectively. Considering the existing surrounding land uses and the incompatibility of mineral resource extraction activities in the project area, potential significant mineral resources within the project area are considered unavailable for extraction; therefore, impacts associated with the loss of available mineral resources would be less than significant.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

### XIII. Noise and Vibration

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project result in:					
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SUBSTANTIATION: (Check if the project is located in the Noise Hazard Overlay District  or is subject to severe noise levels according to the General Plan Noise Element ):

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Air Quality and GHG Emissions Attachments (Appendix A), Noise Attachments (Appendix E)

#### Noise Characteristics

Noise is defined as unwanted sound. Sound may be described in terms of level or amplitude (measured in decibels [dB]), frequency or pitch (measured in hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the amplitude of sound is the decibel. Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The dBA scale performs this compensation by discriminating against low and very high frequencies in a manner approximating the sensitivity of the human ear. Several descriptors of noise (noise metrics) exist to help predict average community reactions to the adverse effects of environmental noise, including traffic-generated noise, on a community. These descriptors include the equivalent noise level over a given period ( $L_{eq}$ ), the statistical sound level, the day–night average noise level ( $L_{dn}$ ), and the Community Noise Equivalent Level (CNEL). Each of these descriptors uses units of dBA. Table 18 provides examples of A-weighted noise levels from common sounds. In general,

human sound perception is such that a change in sound level of 3 dBA is barely noticeable, a change of 5 dBA is clearly noticeable, and a change of 10 dBA is perceived as doubling or halving the sound level.

Table 18. Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet flyover at 300 meters (1,000 feet)	100	—
Gas lawn mower at 1 meter (3 feet)	90	—
Diesel truck at 15 meters (50 feet), at 80 kilometers per hour (50 mph)	80	Food blender at 1 meter (3 feet) Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime gas lawn mower at 30 meters (100 feet)	70	Vacuum cleaner at 3 meters (10 feet)
Commercial area Heavy traffic at 90 meters (300 feet)	60	Normal speech at 1 meter (3 feet)
Quiet urban daytime	50	Large business office Dishwasher, next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural night time	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

**Source:** Caltrans 2013.

**Note:** dBA = A-weighted decibel.

$L_{eq}$  is a sound energy level averaged over a specified period (typically no less than 15 minutes for environmental studies).  $L_{eq}$  is a single numerical value that represents the amount of variable sound energy received by a receptor during a time interval. For example, a 1-hour  $L_{eq}$  measurement would represent the average amount of energy contained in all the noise that occurred in that hour.  $L_{eq}$  is an effective noise descriptor because of its ability to assess the total time-varying effects of noise on sensitive receptors.

Unlike the  $L_{eq}$  metrics,  $L_{dn}$  and CNEL metrics always represent 24-hour periods, usually on an annualized basis.  $L_{dn}$  and CNEL also differ from  $L_{eq}$  because they apply a time-weighted factor designed to emphasize noise events that occur during the evening and nighttime hours (when speech and sleep disturbance is of more concern). “Time weighted” refers to the fact that  $L_{dn}$  and CNEL penalize noise that occurs during certain sensitive periods. In the case of CNEL, noise occurring during the daytime (7:00 a.m.–7:00 p.m.) receives no penalty. Noise during the evening (7:00 p.m.–10:00 p.m.) is penalized by adding 5 dB, while nighttime (10:00 p.m.–7:00 a.m.) noise is penalized by

adding 10 dB.  $L_{dn}$  differs from CNEL in that the daytime period is defined as 7:00 a.m.–10:00 p.m., thus eliminating the evening period.  $L_{dn}$  and CNEL are the predominant criteria used to measure roadway noise affecting residential receptors. These two metrics generally differ from one another by no more than 0.5 dB to 1 dB and, as such, are often treated as equivalent to one another.

## **Vibration Characteristics**

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earthmoving equipment.

Several different methods are used to quantify vibration. Peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square amplitude is most frequently used to describe the effect of vibration on the human body and is defined as the average of the squared amplitude of the signal. Decibel notation is commonly used to measure root mean square. The decibel notation acts to compress the range of numbers required to describe vibration.

High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of vibration can damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes). Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

## **Sensitive Receptors**

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would be considered noise and vibration sensitive and may warrant unique measures for protection from intruding noise. Sensitive receptors in the vicinity of the project site consist of residential uses located to the north, south and east of the project site, and residences further to the northwest. These sensitive receptors represent the nearest sensitive land uses with the potential to be impacted by construction and/or operation of the project.

## **Existing Noise Conditions**

Noise measurements were conducted in the vicinity of the project site on October 28, 2020, to characterize the existing noise levels. Table 19 provides the locations, dates, and times the noise measurements were taken. The noise measurements were taken using a Soft dB Piccolo sound

level meter equipped with a 0.5-inch, pre-polarized condenser microphone with pre-amplifier. The sound level meter meets the current American National Standards Institute standard for a Type 2 (General Use) sound level meter. The accuracy of the sound level meter was verified using a field calibrator before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Table 19. Measured Noise Levels

Receptor	Location	Date	Time	L <sub>eq</sub> (dBA)	L <sub>max</sub> (dBA)
ST1	North of project site, near northeast corner of Whittram Avenue and Almond Avenue, west of residential uses and similar setback from Whittram Avenue	10/28/2020	9:35 a.m.–9:50 a.m.	68.2	88.4
ST2	Northwest of project site, at mobile home park at 14224 Whittram Avenue	10/28/2020	10:02 a.m.–10:17 a.m.	63.2	84.1
ST3	South of project site, at Kaiser Park, near tennis court	10/28/2020	10:34 a.m.–10:49 a.m.	57	69.8
ST4	North-northeast of project site, adjacent to residences at 8260 Cherry Avenue	10/28/2020	11:09 a.m.–11:24 a.m.	63.8	84.4
ST5	North-northwest of project site, adjacent to residences at 12914 Chestnut Avenue	10/28/2020	11:43 a.m.–11:58 a.m.	64.9	86.3

**Source:** Appendix E.

**Notes:** L<sub>eq</sub> = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; L<sub>max</sub> = maximum sound level during the measurement interval.

Five short-term noise measurement locations (ST) were conducted in the vicinity of the project site, as shown in Figure 7, Noise Measurement Locations. The measured Leq and maximum noise levels are provided in Table 19. The field noise measurement data sheets are provided in Appendix E, Field Data Noise Sheets. As shown in Table 19, the measured sound levels ranged from approximately 57 dBA Leq at ST3 to approximately 68 dBA Leq at ST1. The primary noise sources at the sites identified in Table 19 consisted of traffic on local roadways; other, secondary noise sources included distant construction noise and industrial noise.

## Regulatory Setting

### *Federal*

There are no federal noise standards that would directly regulate environmental noise during construction and operation of the project. The following is provided because guidance summarized herein is used or pertains to the analysis.

### Federal Transit Administration

In its Transit Noise and Vibration Impact Assessment guidance manual, the Federal Transit Administration (FTA) recommends a daytime construction noise level threshold of 80 dBA  $L_{eq}$  over an 8-hour period (FTA 2018) when “detailed” construction noise assessments are performed to evaluate potential impacts to community residences surrounding a project. Although this FTA guidance is not a regulation, it can serve as a quantified standard in the absence of such limits at the State and local jurisdictional levels.

### Federal Interagency Committee on Noise

Some guidance regarding the determination of a substantial permanent increase in ambient noise levels in the project vicinity above existing levels is provided by the 1992 findings of the Federal Interagency Committee on Noise (FICON; FICON 1992), which assessed the annoyance effects of changes in ambient noise levels resulting from aircraft operations. The FICON recommendations are based upon studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. Annoyance is a qualitative measure of the adverse reaction of people to noise that generates speech interference, sleep disturbance, or interference with the desire for a tranquil environment.

The rationale for the FICON recommendations is that it is possible to consistently describe the annoyance of people exposed to transportation noise in terms of  $L_{dn}$ . The changes in noise exposure that are shown in Table 20 are expected to result in equal changes in annoyance at sensitive land uses. Although the FICON recommendations were specifically developed to address aircraft noise impacts, they are used in this analysis to define a substantial increase in community noise levels related to all transportation noise sources and permanent non-transportation noise sources.

Table 20. Measures of Substantial Increase for Community Noise Sources

Ambient Noise Level Without Project ( $L_{dn}$ )	Significant Impact Assumed to Occur if the Project Increases Ambient Noise Levels by:
<60 dBA	+ 5 dBA or more
60-65 dBA	+ 3 dBA or more
>65 dBA	+ 2 dBA or more

Source: FICON 1992.

Notes:  $L_{dn}$  = day-night average noise level; dBA = decibels.

### State

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services. The guidelines rank noise land use compatibility in terms of “normally acceptable,” “conditionally acceptable,” “normally unacceptable,” and “clearly unacceptable” noise levels for various land use types. Single-family homes are “normally acceptable” in exterior noise environments up to 60 dBA CNEL and “conditionally acceptable” up to 70 dBA CNEL.<sup>9</sup> Multiple-family residential uses are “normally acceptable” up to dBA 65 CNEL and “conditionally acceptable” up to dBA 70 CNEL. Schools, libraries, and churches are “normally acceptable” up to 70 dBA CNEL, as are office buildings and business, commercial, and professional uses.

**Local**

San Bernardino County Code of Ordinances

*Noise Standards.* The County’s Code of Ordinances (Title 8, Development Code; Division 3, Countywide Development Standards; Chapter 83.01, General Performance Standards, Section 83.01.080, Noise) sets interior and exterior noise standards for specific land uses by type of noise source. Noise standards for stationary noise sources are summarized in Table 21. As shown, the noise standard for residential properties is 55 dB(A)  $L_{eq}$  from 7 a.m. to 10 p.m. and 45 dB(A)  $L_{eq}$  from 10 p.m. to 7 a.m. For industrial properties the noise standard from stationary noise sources is 70 dB(A) during any time of the day or night. The County’s Code of Ordinances exempts noise from construction noise provided that construction is limited to between the hours of 7 a.m. to 7 p.m. except on Sundays or federal holidays.

Table 21. Noise Standards for Stationary Noise Sources

Affected Land Uses (Receiving Noise)	7:00 a.m. - 10:00 p.m. (dBA $L_{eq}$ )	10:00 p.m. – 7:00 a.m. (dBA $L_{eq}$ )
Residential	55	45
Professional Services	55	55
Other Commercial	60	60
Industrial	70	70

**Source:** County of San Bernardino 2007a.

**Note:** dBA = A-weighted decibel scale

$L_{eq}$  = (Equivalent Energy Level). The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period, typically one, eight or 24 hours.

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<sup>9</sup> A “conditionally acceptable” designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a “normally acceptable” designation indicates that standard construction can occur with no special noise reduction requirements.

For noise from mobile sources (such as traffic), the County’s standards are summarized in Table 22.

Table 22. Noise Standards for Adjacent Mobile Noise Sources

Categories	Uses	L <sub>dn</sub> or CNEL, dB(A)	
		Interior	Exterior
Residential	Single and multi-family, duplex, mobile homes	45	60
Commercial	Hotel, motel, transient housing	45	60
	Commercial retail, bank, restaurant	50	N/A
	Office building, research and development, professional offices	45	65
	Amphitheater, concert hall, auditorium, movie theater	45	N/A
Institutional / Public	Hospital, nursing home, school classroom, religious institution, library	45	65
Open Space	Park	N/A	65

**Source:** County of San Bernardino 2007a.

**Note:** dBA = A-weighted decibel scale

CNEL = (Community Noise Equivalent Level). The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of approximately five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and ten decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m.

N/A = not applicable

*Vibration Standards.* The County’s Code of Ordinances, Section 83.01.090 prohibits the operation of any device that creates vibration that can be felt without the aid of instruments at or beyond the lot line, or which produces a particle velocity greater than or equal to two-tenths (0.2) inches per second measured at or beyond the lot line.

*San Bernardino Countywide 2020 Policy Plan*

The Hazards Element of the Countywide 2020 Policy Plan (County of San Bernardino 2020b) includes noise goals and policies, including:

**Goal HZ-2: Human-generated Hazards.** People and the natural environment protected from exposure to hazardous materials, excessive noise, and other human-generated hazards.

**Policy HZ-2.7: Truck Routes for Hazardous Materials.** We encourage truck delivery areas to be located away from residential properties and require associated noise impacts to be mitigated.

**Policy HZ-2.8: Proximity to Noise Generating Uses.** We limit or restrict new noise sensitive land uses in proximity to existing conforming noise generating uses and planned industrial areas.

**Policy HZ-2.9: Control sound at the source.** We prioritize noise mitigation measures that control sound at the source before buffers, soundwalls, and other perimeter measures.

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

### **Short-Term Construction Noise**

**Less-than-Significant Impact.** Construction noise is considered a short-term impact and would be considered significant if construction activities exceed the allowable hours of operation, as permitted by the County, and/or the FTA's advisory threshold of 80 dBA  $L_{eq}$  over an 8-hour period. Noise-sensitive land uses in the vicinity of the project include residences to the north (approximately 100 feet from the construction boundary), and residences to the northwest (approximately 180 from the construction boundary). The construction noise assessment focused on noise levels that would occur at the nearest residences; other residences and a school exist to the northeast, at distances of over 1,800 feet and more. Construction noise levels at these more distant receivers would be substantially lower. Modeling assumptions and output calculations are provided in Appendix E, Construction Noise Modeling Inputs and Outputs.

Project-generated construction noise will vary depending on the construction process, the type of equipment involved, the location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week), and the duration of the construction work. A likely worst-case construction noise scenario using information provided by the project applicant as well as equipment identified by CalEEMod (see Section III, Air Quality) for this type and size of development was calculated using the Federal Highway Administration's Roadway Construction Noise Model (FHWA 2008). Table 21 in Section III, Air Quality, presents the equipment list used for the construction noise analysis

Using the provided construction information, the Roadway Construction Noise Model construction noise model was used to predict noise from on-site construction activities. The results are summarized in Table 23 (see Appendix E for model results). As shown, the highest noise levels from construction are predicted to range from approximately 66 dBA  $L_{eq}$  (during the architectural coating phase) to 79 dBA  $L_{eq}$  (during demolition) at the nearest receivers. These maximum noise levels are considered to be a peak exposure, applicable to not more than 10%–15% of the total construction period, only while the construction activity is taking place along the property boundary closest to these nearest off-site receivers. The average construction noise levels (for construction taking place at a range of locations on site and modeled at the acoustical center for analysis purposes) range from approximately 55 dBA  $L_{eq}$  (during architectural coating) to approximately 71 dBA  $L_{eq}$  (during demolition) at the closest residences and are also shown in Table 23. The average noise levels (based upon the acoustic center) are considered a better representation of the overall noise exposure experience for adjacent receivers over the duration of each construction phase.

Table 23. Construction Noise Summary of Results (dBA L<sub>eq</sub>)

Receiver Location/ Description	Land Use	Construction Noise Level by Construction Phase <sup>1</sup>					
		Demo.	Site Prep.	Grading	Building Const.	Paving	Arch. Coating
North Neighbor (100 feet)	Residential	79	77	78	73	73	66
Northwest Neighbor (180 feet)	Residential	74	73	73	70	69	62
Acoustic Cntr. North Neighbor (300 feet)	Residential	71	70	70	68	66	57
Acoustic Cntr. Northwest Neighbor (400 feet)	Residential	68	67	68	65	63	55

**Source:** Appendix E.

**Notes:** L<sub>eq</sub> = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; Demo. = Demolition; Site Prep. = Site Preparation; Building Const. = Building Construction; Arch. Coating = Architectural Coating.

<sup>1</sup> See Section III, Air Quality.

The project would be required to comply with the County's Code of Ordinances, Section 83.01.080 (g)), by adhering to the following construction schedule:

Noise from construction activities may only occur between the hours of 7 a.m. to 7 p.m. on weekdays and Saturdays and may not occur on Sundays or Federal Holidays.

Based on the Roadway Construction Noise Model analysis (FHWA 2008; Appendix E), average noise levels from construction activities are calculated to create noise levels at sensitive residential receivers that do not exceed the FTA construction noise level threshold of 80 dBA L<sub>eq</sub> at nearby sensitive receiver locations; impacts associated with short-term construction noise would be considered less than significant.

### Long-Term Operational Noise

**Less-than-Significant Impact.** Operation of the project would result in the generation of noise both on- and off-site. Consistent with similar warehouse and light industrial uses, business operations supported by the project would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. As such, on-site operational noise sources are expected to include roof-top air conditioning units, parking lot activity, and truck loading dock activity. Off-site noise could be generated by vehicles, including heavy trucks, accessing the project site and contributing to vehicular roadway noise. As detailed below, these operational project

activities would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

#### *On-Site Operational Noise*

Implementation of the project would result in changes to existing noise levels on and around the project site by developing new stationary sources of noise, including introduction of outdoor HVAC equipment. These sources may affect noise-sensitive vicinity land uses off the project site.

The proposed warehouse space overall would not be served by heating or air conditioning equipment. However, the floor plan includes an office space at the northwest building corner and at the northeast building corner. For the analysis of noise from HVAC equipment operation, a York Model ZF-048 package HVAC unit was used as a reference. Based upon the square footage of the offices (5,000 square feet total), it was assumed that one such HVAC unit would be required for each of the office locations. The York Model ZF-048 package HVAC unit has a sound power rating of 80 dBA (Johnson Controls 2015). Based on the warehouse roof design provided, there would be a 2.8-foot-high parapet extending along the perimeter of the roof, which would minimize sound from the HVAC unit at nearby noise-sensitive land uses.

Assuming all the HVAC equipment is operating simultaneously for a minimum period of 1 hour, the worst-case calculated noise level at each property line and at the nearby residences is presented in Table 24. The maximum hourly noise level for all the HVAC equipment operating at each examined point along the property would range from 26 to 31 dBA  $L_{eq}$ , which is well below the County's noise standard of 70 dBA  $L_{eq}$  for industrial properties (to the east and west) and 55 dBA  $L_{eq}$  daytime /45 dBA  $L_{eq}$  nighttime for residential properties.

Table 24. Calculated Noise Level at Property Boundary and Nearby Noise-Sensitive Receivers

Equipment	Noise Level at Property Boundary/Nearby Noise-Sensitive Receiver	
	Receiver Location	Average Noise Level (dBA $L_{eq}$ )
HVAC	Eastern Property Boundary	26
HVAC	Western Property Boundary	27
HVAC	ST1	28
HVAC	ST2	31

**Source:** Appendix E.

**Notes:**  $L_{eq}$  = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibels; ST = short-term noise measurement location (see Figure 7, Noise Measurement Locations).

The results of the mechanical equipment operations noise analysis indicate that the project would comply with the County Code of Ordinances. Mechanical equipment operation would result in noise at the project site property boundaries that are in each case well below the applicable exposure limits.

#### Parking Lot Activity

A comprehensive study of noise levels associated with surface parking lots was published in the *Journal of Environmental Engineering and Landscape Management* (Baltrėnas et al. 2004). The study found that average noise levels during the peak period of use of the parking lot (generally in the morning with arrival of commuters, and in the evening with the departure of commuters), was 47 dBA at 1 meter (3.3 feet) from the outside boundary of the parking lot. The parking areas would function as a point source for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. The employee parking lots are proposed to be situated on the east and west sides of the warehouse, no closer than 30 feet from the property lines of the project site (from center of drive-aisle to fence; 50 feet from parking stalls to fence). At a distance of 30 feet, parking lot noise levels would be no greater than 28 dBA  $L_{eq}$  at the eastern and western property boundaries. This noise level is slightly higher than the noise levels from the HVAC equipment operation along the eastern and western property boundaries (26 to 27 dBA  $L_{eq}$ ). Adding together the parking lot noise (28 dBA  $L_{eq}$ ) and HVAC equipment noise levels (26 to 27 dBA  $L_{eq}$ ), the combined noise level would be approximately 30 dBA  $L_{eq}$ , which is still well below the City's noise standard of 70 dBA  $L_{eq}$  for industrial properties (which exist on either side of the project site). It is also well below the ambient noise levels of 63 to 68 dBA  $L_{eq}$  measured adjacent to the project. Parking lot noise levels at the nearest residences and other noise-sensitive uses would be even lower because these land uses are located further away.

#### Truck Loading Dock Activity

The parking lot study (Baltrėnas et al. 2004) also examined noise levels associated with cargo truck delivery activity, including noise produced by backup alarms and forklift/yard hostler operations. The study concluded that average noise levels from truck loading/unloading areas was 96 dBA at one meter (3.3 feet) from the boundary of the truck activity area. The truck loading dock area (i.e., the truck court) would be located on the southern side of the proposed warehouse building, and the site design includes perimeter walls in the truck court area. The truck court would be surrounded by 8-foot-high solid perimeter walls. Additionally, the warehouse building would provide effective screening of the truck loading dock noise at the nearby noise-sensitive uses, which are all located to the north, northwest or northeast. The loading docks would be located approximately 200 feet from the both the eastern and western property lines. Using the outdoor attenuation rate of 6 dBA with each doubling of distance, truck loading activity along the eastern and western (industrially-zoned) property lines would produce noise levels of approximately 60 dBA  $L_{eq}$ , not accounting for the 8-foot-high perimeter walls or shielding effects from the building's configuration for the industrial uses to the east and west. Accounting for this acoustical shielding, the truck loading dock noise at the northern and eastern project boundaries is estimated to be approximately 55 dBA  $L_{eq}$ . Consequently, truck-loading operations would comply with the San Bernardino County noise standard of 70 dBA  $L_{eq}$  for industrial uses. Additionally, truck loading dock noise at the nearest noise-sensitive uses (located to the north and northwest) would be approximately 34 and 32 dBA  $L_{eq}$  respectively, accounting for distance and the shielding provided by the intervening warehouse building and the truck court walls.

In summary, the project would have operational noise levels well below the County's noise standards for industrial noise (70 dBA  $L_{eq}$  day or night) and residential noise (55 dBA  $L_{eq}$  daytime /45 dBA  $L_{eq}$ ). Consequently, operational noise impacts would be less than significant.

### *Project-Generated Off-Site Traffic Noise*

The project is expected to generate 365 daily trips to the roadway system; in terms of passenger car equivalents, or PCE, which accounts for truck percentages, the project would generate 534 PCE). Existing industrial uses on-site generate approximately 519 trips to the roadway system, or 659 PCE. Thus, overall trips on-site would decrease, and the project would not result in a doubling of trips on any particular road segment, per existing traffic data provided in the Transportation Assessment (Appendix F). Typically, a doubling of the energy of a noise source, such as a doubling of traffic volume, would increase noise levels by 3 dBA<sup>10</sup>. Given that it would result in a modest decrease in traffic on local and regional roadways, the project would not result in an increase of 3 dBA or greater on roadways in the study area. The change in noise level due to the project would not be audible. Therefore, impacts associated with off-site project-generated traffic noise would be less than significant.

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

**Less-than-Significant Impact.** The main concern associated with ground-borne vibration is annoyance; however, in extreme cases, vibration can cause damage to buildings, particularly those that are old or otherwise fragile. Some common sources of ground-borne vibration are trains, and construction activities such as blasting, pile-driving, and heavy earth-moving equipment. The primary source of ground-borne vibration occurring as part of the project is construction activity.

According to Caltrans, D-8 and D-9 Caterpillars, earthmovers, and trucks have not exceeded 0.10 inches/second PPV at 10 feet. Since the closest off-site residence is located approximately 100 feet away from likely heavy construction equipment, vibration from construction activities at the closest sensitive receiver would not exceed the significance threshold of 0.20 inches/second PPV. Vibration-sensitive instruments and operations may require special consideration during construction. Vibration criteria for sensitive equipment and operations are not defined and are often case-specific. As a guide, major construction activity within 200 feet and pile driving within 600 feet may be potentially disruptive to vibration-sensitive operations (Caltrans 2020b). There are no known vibration-sensitive facilities within 200 feet of the project, and pile driving would not be employed in project construction. Therefore, project construction would not result in a significant impact associated with ground-borne vibration.

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<sup>10</sup> Under normal circumstances (i.e., outside of a controlled setting such as a listening laboratory), a 3-dBA increase in noise levels is considered to be the smallest increase that is audible to the human ear; whereas a less than 3-dBA increase in noise levels is considered to be a barely or non-audible increase.

- 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?**

**No Impact.** There are no private airstrips located in the project vicinity (AirNav 2020). The project site is located approximately 5.5 miles northeast of Ontario International Airport and is subject to the 2011 Airport Land Use Compatibility Plan (City of Ontario 2011). According to the 2011 Airport Land Use Compatibility Plan, the project site is not located within the Airport Influence Area and is outside of the 60-65 dBA CNEL aircraft noise contour or higher-level noise contours. Therefore, the project would not require mitigation measures (such as noise-rated windows, doors, or building assemblies) to reduce aircraft-generated noise and would not expose people residing or working in the project area to excessive noise levels. Therefore, there would be no impact related to aircraft and airport-related noise.

#### XIV. Population and Housing

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials.

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

**Less-than-Significant Impact.** The project would require a temporary construction workforce and a permanent operational workforce, both of which could potentially induce population growth in the project area. The temporary workforce would be needed to construct the proposed industrial/warehouse building and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction, but will likely fluctuate between a few and several dozen workers on a daily basis. However, it is anticipated that the limited number of construction workers needed to develop the project would come from the local labor pool, with additional workers from outside the region not being required.

Because the future tenant is not yet known, the number of jobs that the project would generate cannot be precisely determined. Thus, for purposes of analysis, employment estimates are calculated using average employment density factors reported by SCAG in their publication "Employment Density Study." This publication reports that for every 2,111 square feet of warehouse space in San Bernardino County, the median number of jobs supported is one employee (SCAG 2001). The proposed warehouse would be 209,600 square feet, and as such, the estimated number of employees required for operation would be approximately 100 people.

According to the SCAG Demographics and Growth Forecast (appendix to the 2016–2040 RTP/SCS [SCAG 2016a]), employment in unincorporated San Bernardino County is anticipated to grow from 57,400 in 2012 to 91,100 in 2040 (SCAG 2016b, p. 28). The project-related increase in employment would be minimal in comparison to the anticipated increase in the SCAG Demographics and Growth Forecast.

Additionally, current data (July 2021) provided by the California Employment Development Department found that the unemployment rate for the County of San Bernardino, is at 7.9%, which is similar to the state (7.9%) (EDD 2021). Therefore, the project's temporary and permanent employment requirements could likely be met by the County's existing labor force without people needing to relocate into the project region. The project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans. Therefore, impacts associated with population growth would be less than significant.

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

**Less-than-Significant Impact.** The project site contains a residence that is also used as an office for trucking operations that occur on site. This building would be removed to facilitate construction of the project. Given that the surrounding area (i.e., the City of Fontana – where the majority of local housing opportunities are located) currently has an estimated vacancy rate of 4.2%, equating to approximately 2,227 vacant dwelling units (U.S. Census Bureau 2016), it is assumed that the resident living on the project site would be able to secure new housing in or around the project area. Therefore, impacts associated with displacement of housing and people would be less than significant.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

**XV. Public Services**

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

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

***Fire protection?***

**Less-than-Significant Impact.** The SBCFD provides emergency mitigation and management for fire suppression. SBCFD services and programs include helicopter rescue, a dozer, fire abatement hand crews, an inmate hand crew specialized program, and an honor guard. As of 2016, SBCFD covers a territory of 16,500 square miles and operates over 75 fire stations and 11 facilities that serve more than 60 unincorporated communities (County of San Bernardino 2020a). The closest fire station to the project site is Station #73 (8143 Banana Avenue) located approximately 1 mile to the north (County of San Bernardino 2020a). The current 2019 response time is 8 minutes and 38 seconds on average; however, this information is skewed due to the extreme response distances in the outlying areas of the County (County of San Bernardino 2020a). Based on the proximity of the project site to the existing SBCFD facilities and the fact that the project site is already located within the SBCFD service area, the project could be adequately served by the SBCFD without the construction of new, or the expansion of existing, facilities.

Additionally, the project would neither directly nor indirectly induce population growth in the County, and the proposed land use and activities are not expected to result in an increase in calls for service to the project site in comparison to the existing conditions. Overall, it is anticipated that the project would be adequately served by existing SBCFD facilities, equipment, and personnel. Therefore, impacts associated with the construction or expansion of SBCFD facilities would be less than significant.

### ***Police protection?***

**Less-than-Significant Impact.** The San Bernardino County Sheriff's Department is the chief law enforcement agency for the County. The department's general law enforcement mission is carried out through the operation of 15 stations and a centralized headquarters, gangs, narcotics and homicide investigations, a crime laboratory and identification bureau, central records, specialized enforcement detail, technical services division, training division, employee resources division, two dispatch communication centers, and an aviation division for general patrol and search/rescue operations (County of San Bernardino 2020a). The closest police station to the project site is the Fontana Patrol Station (17780 Arrow Boulevard Fontana, CA 92335) located approximately 4.5-miles east of the project site.

The project site, which has been used for industrial purposes for decades, has historically received police protection services. 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. 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.

### ***Schools?***

**No Impact.** The project would not directly or indirectly induce population growth in the County. The number of employees hired to construct and operate the project would be minimal and would likely already reside within the broader project area. As such, it is not anticipated that people would relocate to the County as a result of the project, and thus, an increase in school-age children requiring public education is not expected to occur.

Nonetheless, similar to other development projects in the County, the project would be subject to Senate Bill 50, which requires the payment of mandatory impact fees to offset any impact to school services or facilities (County of San Bernardino 2020a). These impact fees are required of most residential, commercial, and industrial development projects in the County. Therefore, no impacts associated with the construction or expansion of school facilities would occur.

### ***Parks?***

**No Impact.** As discussed in Section XIV response (a), the project would not induce substantial population growth in the County. As such, the project would not increase the use of existing parks and recreational facilities requiring the need for additional parks. Therefore, no impacts associated with the construction or expansion of parks would occur.

**Other public facilities?**

**No Impact.** Given the lack of population growth that would result from the project, it is unlikely that the project would increase the use of libraries and other public facilities. Additionally, future development would generate new tax revenues and funding sources for the San Bernardino County Library would consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue (County of San Bernardino 2020a). Therefore, no impact associated with libraries and other public facilities would occur.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**XVI. Recreation**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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 will occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials

- 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?***

**Less-than-Significant Impact.** The project consists of the construction and operation of an industrial/warehouse building, equaling a combined total of 209,600 square feet (inclusive of office space). As discussed in Section XIV response (a), the project would not induce substantial population growth in the County. As such, the project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of recreational facilities would occur or be accelerated. Additionally, due to the anticipated

limited number of construction personnel, short-term impacts to local recreational facilities would not occur. Therefore, substantial physical deterioration of these facilities would not occur or be accelerated with implementation of the project, and the project would result in less-than-significant impacts to recreational facilities.

**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?**

**Less-than-Significant Impact.** As mentioned above, the project would not induce substantial population growth in the County. Thus, the project would not increase the demand for recreational facilities. Additionally, the project would not promote or indirectly induce new development that would require the construction or expansion of recreational facilities. As such, the project would result in less-than-significant impacts related to the construction or expansion of recreational facilities.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**XVII. Transportation**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
Would the project:					
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SUBSTANTIATION:

San Bernardino Countywide Policy Plan, 2020; Submitted Project Materials; Transportation Assessment (Appendix F)

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

**Less-than-Significant Impact.** As detailed below, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The following analysis is based on the Whittram Warehouse Project Transportation Assessment prepared by Dudek in December 2020. That assessment was prepared consistent with the requirements of the County's Transportation Impact Study (TIS) Guidelines (County of San Bernardino 2019), the Countywide Policy Plan Transportation and Circulation Element, SB 743, and current CEQA Guidelines.

**Trip Generation Analysis**

Trip generation estimates for the project are based on daily and AM and PM peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 10th Edition (ITE 2017), using the warehousing land use (ITE Code 150). Trip generation estimates for the project are summarized below and detailed in the Transportation Assessment (Appendix F).

Additionally, while there are existing industrial uses on the site, consisting of approximately 10.02 acres of primarily industrial land uses, including a truck dismantling and heavy equipment businesses to the east and a wood recovery facility to the far west, trip generation estimates for the existing uses could not be determined from available ITE trip rates. However, for the purposes of this analysis, existing trip generation is provided in Appendix F for informational purposes only and are estimated based on a General Light Industrial rate (ITE Code 110), consistent with the industrial zoning for the project site. Due to absence of the acreage metric in the for ITE Code 110 in the 10th Edition, the 9th Edition Handbook was used to determine trip generation estimates as existing building square footages are unknown. No trip credits for the existing industrial uses have been assumed in this analysis.

PCE factors were applied to the trip generation estimates to account for truck traffic. The San Bernardino County Congestion Management Program indicates that projects with high truck percentages should convert project trips to PCE. A 1.5 PCE factor was applied to 2-axle trucks, 2.0 PCE for 3-axle trucks, and a 3.0 PCE factor was applied to 4-axle trucks per the San Bernardino County Congestion Management Program.

As detailed in Transportation Assessment (Appendix F), the project would generate 365 daily trips, 36 AM peak hour trips (27 inbound and 9 outbound), and 60 PM peak hour trips (17 inbound and 43 outbound). Accounting for truck traffic from the warehousing land use, the project would generate 534 daily PCE trips, 55 AM peak hour PCE trips (40 inbound and 15 outbound), and 60 PM peak hour PCE trips (17 inbound and 43 outbound).

## **Roadway Facilities**

The project is located within the jurisdiction of the County of San Bernardino; therefore, the following consistency requirements would apply.

### *San Bernardino Associated Governments Congestion Management Plan*

The project is located in San Bernardino County and therefore, the San Bernardino County Transportation Authority Congestion Management Plan (CMP) is applicable. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, Proposition 111 created the Congestion Management Program in 1990. The intent of the Congestion Management Program is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program process. In 1990, the San Bernardino Associated Governments was designated the Congestion Management Agency for San Bernardino County. Although implementation of the CMP was made voluntary by the passage of AB 2419 (Bowler, 1996), the CMP requirement has been retained in San Bernardino County.

The level of service (LOS) at each CMP location is monitored by local jurisdictions in order to implement the statutory requirements of the CMP. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan. The local CMP requires that a Transportation Impact Analysis report be prepared when a project's trip generation exceeds 250 two-way peak hour trips and expects to add at least 50 two-way peak hour trips to a State highway facility. For the CMP roadway system, the LOS standard shall be E for all segments and intersections except those designated LOS F, as listed in Table 2-1 of the CMP (SANBAG 2016). The nearest CMP facilities include the intersection of Etiwanda Avenue and Foothill Boulevard, as well as the segment of Foothill Boulevard, from Etiwanda Avenue to Cherry Avenue.

Based on the project's trip generation estimates described above, development of the project would likely not result in degradation of the nearby intersections due to the low volume of vehicular traffic (less than 250 peak hour trips). Additionally, although the project would generate greater than 50 PCE-adjusted peak hour trips, project traffic would be distributed to the east and west along Whittram Avenue out to truck routes along Cherry Avenue to the east and Etiwanda Avenue to the west. The County of San Bernardino does not provide specific truck route designations aside from Federal and State Truck Routes, as such, truck routes have been referenced from the City of Fontana Local Truck Routes (City of Fontana 2017). Therefore, project-related traffic would disperse in different directions upon leaving the project site and would not add greater than 50 peak hour trips to a State highway facility per the CMP. Therefore, impacts associated with project-related traffic on both the local and regional circulation system would be less than significant.

### *County of San Bernardino Countywide Plan Community Transportation and Mobility Element*

On October 27, 2020, the County of San Bernardino Board of Supervisors adopted the Countywide Plan, inclusive of the Policy Plan (County of San Bernardino 2020b). The Transportation and Mobility Element within the Policy Plan includes the following LOS policy:

**Policy TM-1.1 Roadway level of service (LOS).** We require our roadways to be built to achieve the following minimum level of service standards during peak commute periods (typically 7:00-9:00 AM and 4:00-6:00 PM on a weekday):

- LOS D in the Valley Region
- LOS D in the Mountain Region
- LOS C in the North and East Desert Regions

As the project is forecast to generate 55 AM peak hour PCE trips 60 PM peak hour PCE trips, the project would not exceed the 100 two-way peak hour trip threshold for the preparation of a TIS. Therefore, per the County's TIS Guidelines, a TIS and further LOS analysis would not be required and impacts to the County's Community Transportation and Mobility Element would be less than significant.

#### *San Bernardino County Transportation Impact Study Guidelines*

On July 9, 2019, the County of San Bernardino released updated Transportation Impact Study Guidelines (TIS Guidelines). Although changes in CEQA regarding SB 743 implementation shifts the primary metric for traffic analyses from LOS to VMT, the County continues to require a TIS to analyze the potential transportation impacts of proposed development projects, identify improvements required to maintain consistency with the County's LOS standards, and ensure consistency with CEQA (County of San Bernardino 2019). Per the TIS Guidelines, a TIS would be required if a project exceeds 100 or more two-way peak hour trips, and an intersection LOS analysis should be performed where a project would add 50 or more peak hour trips. Trip generation estimates for the project are summarized above and detailed in the Transportation Assessment (Appendix F).

According to the Transportation Assessment, the project is forecast to generate 55 AM peak hour PCE trips 60 PM peak hour PCE trips. As such, the project would not exceed the 100 two-way peak hour trip threshold for the preparation of a TIS. Therefore, per the County's TIS Guidelines, a TIS and further LOS analysis would not be required. As part of the County's review process, County Public Works staff have reviewed the project's Transportation Assessment and concurred with the findings. Therefore, impacts associated with project-related traffic on both the local and regional circulation system would be less than significant.

#### **Pedestrian and Bicycle Facilities**

The Countywide Plan Transportation and Circulation Element identifies and defines the following bicycle facility classifications:

- Class I (shared use or bike paths). A bikeway physically separated from any street or highway. Shared Use Paths may also be used by pedestrians, skaters, wheelchair users, joggers, and other non-motorized users.
- Class II (bike lanes). A portion of roadway that has been designated by striping, signaling, and pavement markings for the preferential or exclusive use of bicyclists.
- Class III (bike route). A generic term for any road, street, path, or way that in some manner is specifically designated for bicycle travel regardless of whether such

facilities are designated for the exclusive use of bicycles or are to be shared with other transportation modes.

- Class IV (separated bikeway). A bikeway for the exclusive use of bicycles and includes a required separation between the bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking.

No existing bicycle facilities exist along Whittram Avenue adjacent to the project site. The nearest bicycle facilities include a Class II bike lane along Cherry Avenue to the east and Arrow Boulevard to the north, as well as a Class I bike path along Hickory Avenue to the west. Development of the project would not conflict with existing or proposed bicycle facilities, and impacts would be less than significant.

The existing frontage to the project site does not include paved sidewalk facilities. However, the project would provide frontage improvements, including sidewalks along the Whittram Avenue frontage. As such, development of the project would not conflict with existing or proposed pedestrian facilities, and impacts would be less than significant.

### **Transit Facilities**

Omnitrans provides public transportation throughout the San Bernardino Valley and would serve as the nearest transit service to the project site. The nearest Omnitrans bus stop serves Route 66, located approximately 0.75 miles north of the project site at the intersection of Almond Avenue and Foothill Boulevard. Route 66 operates between Montclair Plaza and the Fontana Metrolink Transit Center, with a peak service frequency of 20 to 30 minutes throughout the week.

Development of the project would not conflict with the existing bus routes or bus stops. Impacts to transit would be less than significant.

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

**Less-than-Significant Impact.** On September 27, 2013, Senate Bill (SB) 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Under the new transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA (OPR 2018). The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. These guidelines identify VMT as the most appropriate measure of transportation impacts under CEQA and are currently being implemented as of July 1, 2020.

The Updated CEQA Guidelines state that "...generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts..." and define VMT as "...the amount and distance of automobile travel attributable to a project...". It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Heavy-duty truck VMT could be included for modeling convenience and ease of calculation (for example, where models or data provide combined auto and heavy truck

VMT). Other relevant considerations may include the effects of the project on transit and non-motorized travel.

The County released TIS Guidelines on July 9, 2019, detailing the County’s methodology for SB 743 compliance. Per the County’s guidelines, “...a VMT analysis should be conducted for land use projects as deemed necessary by the Traffic Division and would apply to projects that have the potential to increase the average VMT per person or employee” allowing the project to be compared “to the remainder of the unincorporated area for purposes of identifying transportation impacts.”

Based on the County’s July 2019 TIS Guidelines, the project can be screened-out of VMT analysis based on its location in a low VMT generating area. Although the County does not provide a specific low-VMT screening threshold, the County’s TIS guidelines define a project VMT impact if “the project VMT per person/employee is greater than 4% below the existing VMT per person for the unincorporated County.” As such, for the purposes of this analysis, if the project is located within a Traffic Analysis Zone (TAZ) in which the VMT per employee is greater than 4% below the existing baseline, the project would be located in a low VMT generating area. TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior.

As shown in Table 25, the VMT per worker for the project TAZ is 15.6, and the County of San Bernardino VMT per worker is 17. Therefore, the TAZ would be 8.4% below the County’s threshold, which would meet the 4% below baseline screening criteria. Additional VMT discussion is provided in Appendix F.

Table 25. Summary of Project TAZ VMT

Base Year (2020)	VMT
<i>VMT Per Worker</i>	
Project TAZ	15.6
Jurisdiction	17
<b>% Difference (Project TAZ – Jurisdiction)</b>	<b>-8.4%</b>
Threshold	17

**Source:** San Bernardino County Transportation Authority VMT Screening Tool (Attachment A).

Therefore, based on the project’s location in a low VMT generating TAZ, the project can be screened-out of VMT analysis and transportation impacts under CEQA would be considered less than significant.

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

**Less-than-Significant Impact.** Access to the project site would be provided by two driveways off Whittram Avenue; the first driveway would be a 40-foot-wide truck driveway at the northwestern corner of the project site, and the other driveway would be a 40-foot-wide truck driveway at the northeastern corner of the site. The eastern and western

portions of the project site would include paved employee parking lots. The southern portion of the project site would include truck court with trailer parking spaces and loading docks. Gated entry to the truck court would be provided on the southeast and southwest sides of the truck court.

With the exception of required street frontage improvements along Whittram Avenue, including a new sidewalk and curb and gutter, the project does not include any substantial changes to the geometry of streets or intersections. All improvements within the public right-of-way are required to comply with standards set forth by the County to ensure that the project does not introduce an incompatible design feature that would impede operations on adjacent local streets. Therefore, impacts associated with hazardous design features would be less than significant.

**d) Would the project result in inadequate emergency access?**

**Less-than-Significant Impact.** Site access would be provided via two driveways along Whittram Avenue. Emergency vehicle access will be available at both driveways and facilitated within the entirety of the project site. The project site would be accessible to emergency responders during construction and operation of the project. Therefore, impacts associated with an emergency response plan or emergency evacuation plan would be less than significant.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**XVIII. Tribal Cultural Resources**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
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**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan, 2020; Cultural Historical Resources Information System (CHRIS), South Central Coast Information Center, California State University, Fullerton; Submitted Project Materials; Cultural Resources Assessment (Appendix B)

***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

**Less-than-Significant Impact with Mitigation Incorporated.** A pedestrian survey, background research, and records searches conducted as part of the cultural resources letter report (Appendix B) found that there is little potential for the inadvertent discovery of subsurface archaeological, paleontological, or other cultural resources materials during earthwork activities. The records searches conducted at the South Central Coastal Information Center indicated that no previously recorded prehistoric, historic, or built-environment resources are located within the project site. The records search identified five previously conducted cultural resources technical investigations within the records search area. Within 0.5 miles of the project site, 5 cultural resources were previously recorded. Two of these previously recorded cultural resources are historic-era archaeological resources and three are built environment resources; however, none of these previously recorded sites are located on or directly adjacent to the project site.

The pedestrian survey results characterize the project site as entirely disturbed by decades of development activity. As concluded from archival research, the project site was used for agricultural purposes in the early twentieth century before transitioning to industrial activities. No cultural resources were identified within the project site as a result of the pedestrian survey.

Additionally, the project is subject to compliance with AB 52 (California Public Resources Code, Section 21074), which requires consideration of impacts to Tribal Cultural Resources as part of the CEQA process. AB 52 requires the County, as the lead agency responsible for CEQA compliance for the project, to notify any groups (who have

requested notification) of the project who are traditionally or culturally affiliated with the geographic area of the project. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with the County. In accordance with AB 52, on March 29, 2021, the County sent notification letters to the tribal representatives that have formally requested such notice under AB 52.

As part of the government-to-government consultation efforts prescribed under AB 52, the County notified all Native American tribes on the County's AB 52 list of the project, inviting the tribes to consult on the proposed project. To date, the County has received two responses to the notification letters: one response received from the was Gabrieleno Band of Mission Indians-Kizh Nation and one response was received from the San Manuel Band of Mission Indians. Records of consultation are on-file with the County. No tribal cultural resources were identified on the project site during consultation. However, both Tribes requested that mitigation measures be required of the project in the event that previously unidentified tribal cultural resources were present on site.

The project site is entirely disturbed and has been developed for several decades. The development and construction activities that have taken place over the years have heavily disturbed subsurface soils found on the project site. Additionally, much like most of the surrounding area, the project site supported agricultural activities prior to development, which disturbed underlying soils as well.

However, despite the previous disturbance on the project site, it is always possible that intact tribal cultural resources deposits are present at subsurface levels, and the County is committed to preserving the integrity of such resources. Thus, MM-TCR-1 and MM-TCR-2, as well as MM-CUL-1 through MM-CUL-3 would be required to ensure that tribal monitors have access to the project site during subsurface construction activities.

MM-TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The project applicant/lead agency shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation (the "Kizh" or the "Tribe"). The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project, at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be provided to the lead agency prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The project applicant/developer shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of any project ground-disturbing

activity so that the Tribe has sufficient time to secure and schedule a monitor for the project.

- D. The project applicant/developer shall hold at least one (1) pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where at a senior member of the Tribe will inform and educate the project's construction and managerial crew and staff members (including any project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the project's compliance with the TCR mitigation measures.
- E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request.
- F. Native American monitoring for the project shall conclude upon the latter of the following: (1) written confirmation from a designated project point of contact to the Tribe that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact TCRs.

MM-TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods

- A. Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Consulting Tribe(s) (i.e., interested Tribes who have requested and engaged in formal Tribal consultation) shall be immediately informed of the discovery. An archaeologist that meets Secretary of Interior Professional Qualifications and/or a representative from the Consulting Tribe(s) will promptly report to the location of the discovery to evaluate the TCR and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until the Consulting Tribe(s) and archaeologist have completed their assessment/evaluation/treatment of the discovered TCR and surveyed the surrounding area. Treatment protocols outlined in TCR-3 shall be followed for all discoveries that do not include human remains.
- B. If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities

shall immediately cease. Native American “human remains” are defined to include “an inhumation or cremation, and in any state of decomposition or skeletal completeness.” (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as “associated grave goods,” shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).)

- C. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission (NAHC), and Public Resources Code Section 5097.98 shall be followed, which includes the NAHC identifying the “Most Likely Descendant” (MLD). The landowner and MLD will then discuss appropriate treatment of the human remains.
- D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if the MLD determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Tribal representatives and/or archaeologist deems necessary). (14 Cal. Code Regs. § 15064.5(f).)
- E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.
- F. Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance.

### TCR 3: Treatment and Disposition of TCRs

- A. After the notification of discovery to the Consulting Tribe(s) and assessments/evaluations have occurred, the following treatment/disposition of the TCRs shall occur:
  - 1. Preservation-In-Place of the TCRs, if feasible as determined through coordination between the project archeologist, developer/applicant, and Consulting Tribe(s), is the preferred method of treatment. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources in perpetuity.
  - 2. Should Preservation-In-Place not be feasible, the landowner shall accommodate the process for on-site reburial of the discovered items with the Consulting Tribe(s). This shall include measures and provisions to protect

the future reburial area from any future impacts. During the course of construction, all recovered resources shall be temporarily curated in a secure location on site. The removal of any artifacts from the project site shall require the approval of the Consulting Tribe(s) and all resources subject to such removal must be thoroughly inventoried with a tribal representative from each consulting tribe to oversee the process. Reburial shall not occur until all cataloguing and basic recordation have been completed.

3. If Preservation-In-Place and reburial are not feasible, the landowner(s) shall relinquish ownership of all TCRs and a curation agreement with an appropriate qualified repository within San Bernardino County that meets federal standards per 36 CFR Part 79 shall be established. The collections and associated records shall be transferred, including title, to said curation facility by the landowner, and accompanied by payment of the fees necessary for permanent curation.

- B. Any historic archaeological material that is not Native American in origin (non-TCRs) shall be curated at a public, non-profit institution with a research interest in the materials within the County of the discovery, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

If discoveries were made during the project, a Monitoring Report shall be submitted to the County by the Archaeologist at the completion of grading, excavation, and ground-disturbing activities on the site. Said report will document monitoring and archaeological efforts conducted by the archaeologist and Consulting Tribe(s) within 60 days of completion of grading. This report shall document the impacts to the known resources on the property, describe how each mitigation measure was fulfilled, document the type of cultural resources recovered, and outline the treatment and disposition of such resources. All reports produced will be submitted to the County of San Bernardino, appropriate Information Center, and Consulting Tribe(s).

In summary, while there is low potential for the inadvertent discovery of cultural resources within the project site, incorporation of MM-TCR-1 through MM-TCR-3 and MM-CUL-1 through MM-CUL-3 would reduce potential impacts to less than significant levels. Therefore, impacts would be less than significant with incorporation of mitigation.

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

**Less-than-Significant Impact with Mitigation Incorporated.** As discussed in Section XVIII (a), as part of the government-to-government consultation efforts prescribed under AB 52, the County notified all Native American tribes on the County's AB 52 list of

the project, inviting the tribes to consult on the proposed project. To date, the County has received two responses to the notification letters: one response received from the was Gabrieleno Band of Mission Indians-Kizh Nation and one response was received from the San Manuel Band of Mission Indians. Records of consultation are on-file with the County. No tribal cultural resources were identified on the project site during consultation. No tribal cultural resources were identified on the project site during consultation. However, both Tribes requested that mitigation measures be required of the project in the event that previously unidentified tribal cultural resources were present on site. These mitigation measures have been included within this Draft IS/MND as MM-TCR-1 through MM-TCR-3.

The project site is entirely disturbed and has been developed for several decades. The development and construction activities that have taken place over the years have heavily disturbed subsurface soils found on the project site. Additionally, much like most of the surrounding area, the project site supported agricultural activities prior to development, which disturbed underlying soils as well.

However, despite the previous disturbance on the project site, it is always possible that intact tribal cultural resources deposits are present at subsurface levels, and the County is committed to preserving the integrity of such resources. Thus, MM-TCR-1 through MM-TCR-3, as well as MM-CUL-1 through MM-CUL-3 would be required to ensure that tribal monitors have access to the project site during subsurface construction activities. With incorporation of MM-TCR-1 through MM-TCR-3 and MM-CUL-1 through MM-CUL-3, impacts would be less than significant.

**Therefore, with implementation of MM-TCR-1 through MM-TCR-3 and MM-CUL-1 through MM-CUL-3, no significant adverse impacts are identified or anticipated.**

**XIX. Utilities And Service Systems**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact	
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan 2020; Submitted Project Materials

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

**Wastewater Treatment Facilities**

**No Impact.** The Project would include an on-site septic tank to treat wastewater generated on-site. This septic tank would be subject to the permitting requirements of the San Bernardino County Department of Environmental Health Services, which sets forth requirements for the siting and construction of private septic systems. This project component is a part of the project analyzed herein. Given that the project would not require the construction of new or expansion of existing wastewater treatment facilities, the project would have no impact on wastewater treatment facilities.

**Water Treatment Facilities**

**Less-than-Significant Impact.** The project site is located within the service area of the FWC. According to FWC's 2015 UWMP, FWC currently obtains water from three sources:

local groundwater basins (primarily Chino Basin), local surface water, and imported surface water (FWC 2016).

The UWMP contains existing and projected water supplies and demands during dry-year scenarios. Tables 26 through 28 shows projected water supplies during normal year, single dry year, and multiple-dry year conditions, which represents “worst-case” conditions during extended periods of drought when supplies would be reduced.

Table 26. Normal Year Supply and Demand Comparison (Acre-Feet)

Normal-Year Scenario	2020	2025	2030	2035	2040
Supply Totals	40,140	47,536	50,773	53,711	56,562
Demand Totals	40,140	47,536	50,773	53,711	56,562

Source: FWC 2016.

Table 27. Single Dry Year Supply and Demand Comparison (Acre-Feet)

Dry-Year Scenario	2020	2025	2030	2035	2040
Supply Totals	29,998	35,526	37,945	40,141	42,272
Demand Totals	29,998	35,526	37,945	40,141	42,272

Source: FWC 2016

Table 28. Projected Multiple-Dry Year Supply and Demand Comparison (Acre-Feet)

Dry-Year Scenario	2020	2025	2030	2035	2040
<i>Multiple-Dry Year, First Year</i>					
Supply Totals	37,757	44,714	47,759	50,523	53,204
Demand Totals	37,757	44,714	47,759	50,523	53,204
<i>Multiple-Dry Year, Second Year</i>					
Supply Totals	36,462	43,180	46,120	48,790	51,379
Demand Totals	36,462	43,180	46,120	48,790	51,379
<i>Multiple-Dry Year, Third Year</i>					
Supply Totals	29,998	29,998	37,945	40,141	42,272
Demand Totals	29,998	29,998	37,945	40,141	42,272

Source: FWC 2016.

Once operational, the project would consume water at a rate of approximately 3.3 acre-feet per year, based on FWC water consumption rates (0.33 acre-feet per acre per year for industrial use) (IEUA 2016a). Based on the project’s usage rate, the project would represent a nominal percentage of FWC’s present and future water supplies for both

normal year, single-dry year, and multiple-dry-year scenarios. As such, the project's future water demands would be met through projected future water supplies. and would be conveyed and treated via existing infrastructure without the need for new or expanded facilities. Therefore, impacts associated with water facilities would be less than significant.

### **Stormwater Drainage Facilities**

**Less-than-Significant Impact.** The project would inevitably alter the drainage patterns of the project site; however, the project would include a new engineered stormwater drainage system that would be designed to conform with applicable federal, state, and local requirements related to drainage, hydrology, and water quality, including the current MS4 Permit adopted by the Santa Ana RWQCB. Per the requirements of the MS4 Permit, the project's WQMP will be required to demonstrate the future stormwater system can adequately treat and manage stormwater flows such that they would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts associated with stormwater drainage facilities would be less than significant.

### **Other Wet and Dry Utilities**

**Less-than-Significant Impact.** The project site is currently developed and served by existing utilities, including wet and dry facilities (with the exception of sanitary sewer service). As part of the project, lateral connections would be made to these existing utilities and no off-site utility upgrades would be necessary. Additionally, the project would involve the construction of an on-site septic tank to treat wastewater; however, this system would be located entirely within the project site. Any improvements required to existing electrical, natural gas, or telecommunications utilities would happen within or immediately adjacent to the project site and will occur as part of the project analyzed herein. As such, any upgrades to existing electrical, natural gas, or telecommunications utilities are already evaluated as part of the overall project, and no additional environmental impacts not already assessed in this document would occur. Therefore, impacts associated with other wet and dry utilities would be less than significant.

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

**Less-than-Significant Impact.** As previously discussed, the project site is located within the service area of the FWC. According to FWC's 2015 UWMP, FWC currently obtains water from three sources: local groundwater basins (primarily Chino Basin), local surface water, and imported surface water (FWC 2016).

The UWMP contains existing and projected water supplies and demands during normal and dry-year scenarios. As shown in response (a), Tables 26 through 28 show projected water supplies during single- and multiple-dry year conditions, which represents "worst-case" conditions during extended periods of drought when supplies would be reduced. Once operational, the project would consume water at a rate of approximately 3.3 acre-feet per year, based on FWC water consumption rates (0.33 acre-feet per acre per year

for industrial use) (IEUA 2016a). Based on the project's usage rate, the project would represent a nominal percentage of FWC's present and future water supplies for both single- and multiple-dry-year scenarios. As such, the project's future water demands would be met through projected future water supplies.

The project's water needs could be sufficiently met by existing and future water supplies and would be conveyed and treated via existing infrastructure without the need for new or expanded facilities. Therefore, impacts associated with water facilities would be less than significant.

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

**No Impact.** Wastewater generated by the project would be treated by an on-site septic tank system. Septic tanks installed in the County are subject to Section 33.0890 *et seq.*, Liquid Waste Disposal, of the San Bernardino County Code, which requires issuance of a permit by the San Bernardino County Department of Environmental Health Services for the construction of a private septic system and sets forth requirements for the siting and construction of private septic systems.

Prior to issuance of a Sanitation Permit, the San Bernardino County Department of Environmental Health Services will review the proposed septic system to ensure it is sufficiently sized and meets applicable development standards. As such, no determination of adequate capacity by a wastewater treatment provider is necessary to accommodate the project.

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

**Less-than-Significant Impact.** Private trash hauling companies collect solid waste from unincorporated areas of the County under franchise agreements with the County. Once collected, solid waste is transported to sorting/disposal facilities permitted to accept residential and commercial solid waste, with each facility's operations routinely inspected by regional and state regulatory agencies for compliance with all applicable statutes and regulations.

Non-durable wholesale distributors on average generate 6,931 pounds of waste material per employee per year. Of the total waste generation, approximately 4,070 pounds is diverted per employee per year (CIWMB 2006). Assuming that the project will employ a maximum of 100 employees, the project could produce approximately 693,100 pounds (347 tons) of solid waste per year, or 1,899 pounds (0.9 tons) per day. Note that these estimates represent a conservative, "worst-case" scenario and do not include credit for the diversion requirements set forth by AB 939. The County and cities within the County shall abide by AB 939 and AB 341 and divert 75 percent of their waste from landfills by the year 2020. AB 939 also requires California counties to show 15 years disposal capacity for all jurisdictions within the County; or show a plan to transform or divert its

waste (County of San Bernardino 2020a). Assuming that this diversion rate holds into the future, it is estimated that roughly half of the daily amount of solid waste generated by the project—or approximately 950 pounds (0.5 tons)—would require disposal at a permitted landfill facility.

The nearest permitted and active municipal waste landfill to the project site is the 498-acre (408-disposal-acre) Mid-Valley Landfill in the City of Rialto (CalRecycle 2019). The Mid-Valley Landfill has a permitted throughput of 7,500 tons per day, or more than 2.7 million tons per year. The amount of solid waste produced by the project would represent a nominal percentage of the land facility's permitted daily throughput and an equally small increase in the amount of solid waste processed at the facility per year. All collection, transportation, and disposal of any solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. In particular, AB 939 requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Cities, counties, and regional agencies are required to develop a waste management plan that would achieve a 50% diversion from landfills (California Public Resources Code, Section 40000 et seq.).

As required by existing regulations, any hazardous materials collected on the project site during demolition, construction, or operational activities would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, impacts associated with permitted landfill capacity and solid waste statutes and regulations would be less than significant.

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

**Less-than-Significant Impact.** Private trash hauling companies collect solid waste from unincorporated areas of the County under franchise agreements with the County. Once collected, solid waste is transported to sorting/disposal facilities permitted to accept residential and commercial solid waste, with each facility's operations routinely inspected by regional and state regulatory agencies for compliance with all applicable statutes and regulations.

Non-durable wholesale distributors on average generate 6,931 pounds of waste material per employee per year. Of the total waste generation, approximately 4,070 pounds is diverted per employee per year (CIWMB 2006). Assuming that the project will employ a maximum of 100 employees, the project could produce approximately 689,100 pounds (347 tons) of solid waste per year, or 1,899 pounds (0.9 tons) per day. Note that these estimates represent a conservative, "worst-case" scenario and do not include credit for the diversion requirements set forth by AB 939. The County and cities within the County shall abide by AB 939 and AB 341 and divert 75 percent of their waste from landfills by the year 2020. AB 939 also requires California counties to show 15 years disposal capacity for all jurisdictions within the County; or show a plan to transform or divert its waste (County of San Bernardino 2020a). Assuming that this diversion rate holds into the future, it is estimated that roughly half of the daily amount of solid waste generated by the project—or approximately 950 pounds (0.5 tons)—would require disposal at a permitted landfill facility.

The nearest permitted and active municipal waste landfill to the project site is the 498-acre (408-disposal-acre) Mid-Valley Landfill in the City of Rialto (CalRecycle 2019). The Mid-Valley Landfill has a permitted throughput of 7,500 tons per day, or more than 2.7 million tons per year. The amount of solid waste produced by the project would represent a nominal percentage of the land facility's permitted daily throughput and an equally small increase in the amount of solid waste processed at the facility per year. All collection, transportation, and disposal of any solid waste generated by the project would comply with all applicable federal, state, and local statutes and regulations. In particular, AB 939 requires that at least 50% of solid waste generated by a jurisdiction be diverted from landfill disposal through source reduction, recycling, or composting. Cities, counties, and regional agencies are required to develop a waste management plan that would achieve a 50% diversion from landfills (California Public Resources Code, Section 40000 et seq.).

As required by existing regulations, any hazardous materials collected on the project site during demolition, construction, or operational activities would be transported and disposed of by a permitted and licensed hazardous materials service provider at a facility permitted to accept such hazardous materials. Therefore, impacts associated with permitted landfill capacity and solid waste statutes and regulations would be less than significant.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

**XX. Wildfire**

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**SUBSTANTIATION:**

San Bernardino Countywide Policy Plan 2020; Submitted Project Materials

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

**Less-than-Significant Impact.** The project site is located in a highly developed part of the County outside of an urban-wildland interface. The project site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones (CAL FIRE 2008), and the nearest natural open space area is found more than 1 mile south of the site. Additionally, as discussed in Section IX response (f), the project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts associated with an adopted emergency response plan or emergency evacuation plan would be less than significant.

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

**Less-than-Significant Impact.** A project could result in an impact related to the exacerbation of wildfire risks if the project was located in or near a state responsibility area or in or near lands classified as very high fire hazard severity zones, and the project were to result in modifications to climatic, topographic, vegetation, weather conditions, or other factors that subsequently increase the severity of a wildfire. The project site is located in a highly developed area of the County with a relatively flat topography.

As discussed in Section IX response (g), the project site would be located in a local responsibility area. The project site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones (CAL FIRE 2008), and the nearest natural open space area is found more than 1 mile south of the site. Furthermore, to reduce the threat of wildfires, the San Bernardino County Fire Hazard Abatement (FHA) Program enforces the fire hazard requirements in San Bernardino County Code Sections 23.0301 to 23.0319. The FHA Program establishes defensible space and reduction/removal of flammable materials on properties (County of San Bernardino 2020c). Therefore, impacts associated with the project exacerbating wildfire risk would be less than significant.

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

**No Impact.** The project site is located in a highly developed part of the County and would connect to existing infrastructure (i.e., aboveground and underground utility lines, roads, etc.) located within the immediate vicinity of the project site. The project would require that this existing infrastructure be maintained throughout the life of the project; however, the maintenance of this infrastructure would not exacerbate fire risks because the project site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones (CAL FIRE 2008). The nearest natural open space area is found more than 1 mile south of the site. Given the highly developed location of the project area and distance between the project site and nearest natural open space, implementation of the project would not exacerbate wildfire risks. Therefore, the project would result in no impact with regard to the installation or maintenance of associated infrastructure that may exacerbate fire risk.

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

**Less-than-Significant Impact.** The project site is located in a highly developed part of the County outside of an urban-wildland interface. The project site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones (CAL FIRE 2008), and the nearest natural open space area is found more than 1 mile

south of the site. The project would result in grading to a level surface, altering the existing drainage pattern of the site. However, the project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. Due to the proposed grading of the site, the relatively flat surrounding lands, and the fact that the site would be paved for development and parking, it is unlikely that the project would expose people or structures to downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the project would result in less than significant impacts with regard to downslope or downstream flooding or landslides.

**Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.**

### XXI. Mandatory Findings of Significance

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	effects of probable future projects)?				
c)	Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Less-than-Significant Impact with Mitigation Incorporated.** As described in Section IV, Biological Resources, Section V, Cultural Resources, Section VII, Geology and Soils, and Section XVIII, Tribal Cultural Resources, the project would not result in significant impacts to biological resources, archaeological resources, paleontological resources, and tribal cultural resources with mitigation incorporated.

Therefore, with the incorporation of mitigation, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

**Less-than-Significant Impact with Mitigation Incorporated.** As addressed herein, the project would potentially result in project-related air quality, biological resources, cultural resources, paleontological, and tribal cultural resources, that could be potentially significant without the incorporation of mitigation. Thus, when coupled with similar impacts related to the implementation of other cumulative projects located throughout the broader project area, the project would potentially result in cumulative-level impacts if these significant impacts are left unmitigated.

However, with the incorporation of mitigation identified within this Initial Study/Mitigated Negative Declaration, the project’s individual-level impacts would be reduced to less-than-significant levels and would not considerably contribute to cumulative impacts in the greater project region. Additionally, these other related projects would presumably be bound by their applicable lead agency to (1) comply with the all applicable federal, state,

and local regulatory requirements; and (2) incorporate all feasible mitigation measures, consistent with CEQA, to further ensure that their potentially cumulative impacts would be reduced to less-than-significant levels.

Although cumulate impacts are always possible, the project, by incorporating all mitigation measures outlined herein, would reduce its contribution to any such cumulative impacts to less than cumulatively considerable. Therefore, the project would result in individually limited, but not cumulatively considerable, impacts. Thus, impacts would be less-than-significant with mitigation incorporated.

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

**Less-than-Significant Impact with Mitigation Incorporated.** As evaluated throughout this document, the project would have no impact, less-than-significant impact, or less-than-significant impact with mitigation incorporated with respect to all environmental impact areas. Therefore, with incorporation of mitigation, the project would not directly or indirectly cause substantial adverse effects on human beings.

**Therefore, with implementation of mitigation, no significant adverse impacts are identified or anticipated.**

## GENERAL REFERENCES

- Airnav.com. 2020. Accessed December 29, 2020. <https://www.airnav.com/airports/get>.
- Baltrėnas, P., D. Kazlauskas, and E. Petraitis. 2004. "Testing on Noise Level Prevailing at Motor Vehicle Parking Lots and Numeral Simulation of Its Dispersion." *Journal of Environmental Engineering and Landscape Management* 12:2, 63– 70.
- CalEPA (California Environmental Protection Agency). 2020. "Cortese List Data Resources." Accessed June 2020. <https://calepa.ca.gov/sitecleanup/corteselist/>.
- CAL FIRE. 2008. "Very High Fire Hazard Severity Zones in LRA" [map]. October 29, 2008. Accessed January 2018. <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>.
- CalRecycle (California Department of Resources Recycling and Recovery). 2019. "Facility/Site Summary Details: Mid-Valley Sanitary Landfill (36-AA-0055)." Accessed December 2020. <https://www2.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0055/Detail>.
- Caltrans (California Department of Transportation). 2013. Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. September 2013.
- Caltrans. 2020a. "California Scenic Highway Mapping System." Accessed November 2020. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- Caltrans. 2020b. Transportation and Construction Vibration Guidance Manual. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. Sacramento, CA. April 2020.
- CAPCOA (California Air Pollution Control Officers Association). 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008.
- CARB (California Air Resources Board). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Accessed October 2017. <http://www.arb.ca.gov/ch/landuse.htm>.
- CARB. 2014. First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006. May 2014. Accessed May 2019. [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/first\\_update\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf).

- CARB. 2017. California's 2017 Climate Change Scoping Plan. November 2017. [https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).
- CARB. 2019. "Common Air Pollutants." <https://ww2.arb.ca.gov/resources/common-air-pollutants>.
- CBC (California Building Code). 2019. "2019 California Building Code: California Code of Regulations; Title 24. Based on the 2018 International Building Code. Sacramento, California: California Building Standards Commission. July 2016. [http://www.ecodes.biz/ecodes\\_support/Free\\_Resources/2013California/13Building/13Building\\_main.html](http://www.ecodes.biz/ecodes_support/Free_Resources/2013California/13Building/13Building_main.html).
- CDOC (California Department of Conservation). 2020a. Important Farmland Finder. Accessed November 2020. <https://www.conservation.ca.gov/dlrp/fmmp>.
- CDOC. 2020b. "Regulatory Maps." Accessed November 2020. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.
- CDOC. 2020c. "Division of Oil, Gas, and Geothermal Resources Well Finder." Accessed December 2020. <http://maps.conservation.ca.gov/doggr>.
- CEC (California Energy Commission). 2018. Forecast Commission Final Report, California Energy Demand 2018-2030 Revised. February 2018. Accessed July 2020.
- CEC. 2019. "Electricity Consumption by Entity." Accessed June 2020. <http://www.ecdms.energy.ca.gov/elecbyutil.aspx>.
- CEC. 2020a. "Electricity Consumption by County." Accessed January 2021. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.
- CEC. 2020b. "Gas Consumption by County." Accessed January 2021. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.
- CIWMB (California Integrated Waste Management Board). 2006. Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups. June 2006. Accessed January 2018. <http://www.calrecycle.ca.gov/publications/Documents/Disposal%5C34106007.pdf>
- City of Fontana. 2017. City of Fontana Local Truck Routes. Ordinance No. 1273. Revised January 5, 2017. Accessed December 2020. <https://www.fontana.org/DocumentCenter/View/3971/Local-Truck-Routes-2017-11x17?bidId=>.
- City of Ontario. 2011. Ontario International Airport Land Use Compatibility Plan. Accessed November 2020. <https://www.ontarioplan.org/alucp-for-ontario-international-airport/>
- CNRA (California Natural Resources Agency). 2009. Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97. December 2009.

County of San Bernardino. 2007a. County of San Bernardino 2007 Development Code. Accessed December 2020. <http://www.sbcounty.gov/Uploads/lus/DevelopmentCode/DCWebsite.pdf>.

County of San Bernardino. 2007b. County of San Bernardino 2007 General Plan. Accessed December 2020. <http://www.sbcounty.gov/Uploads/lus/GeneralPlan/FINALGP.pdf>.

County of San Bernardino. 2008. San Bernardino County Land Use Plan General Plan Land Use Zoning District Map. Accessed December 2020. <http://cms.sbcounty.gov/lus/Planning/ZoningOverlayMaps/ZoningMaps.aspx>.

County of San Bernardino. 2013. Technical Guidance Document for Water Quality Management Plans. June 21, 2013. <https://cms.sbcounty.gov/Portals/50/Land/SantaAnaRiver-WQMP-Final-June2013.pdf?ver=2019-06-11-140312-780>

County of San Bernardino. 2019. Transportation Impact Study Guidelines. Accessed December 2020. <https://cms.sbcounty.gov/Portals/50/transportation/Traffic-Study-Guidelines.pdf?ver=2019-10-03-155637-153>.

County of San Bernardino. 2020a. San Bernardino Countywide Plan Final Program Environmental Impact Report. Adopted October 2020. <http://countywideplan.com/eir/>

County of San Bernardino. 2020b. San Bernardino Countywide Plan Policy Plan. October 2020. Accessed March 2021. [http://countywideplan.com/wp-content/uploads/2021/01/CWP\\_PolicyPlan\\_HardCopy\\_MainText\\_Tables\\_20201027\\_adopted.pdf](http://countywideplan.com/wp-content/uploads/2021/01/CWP_PolicyPlan_HardCopy_MainText_Tables_20201027_adopted.pdf).

County of San Bernardino. 2021. San Bernardino County Code of Ordinances. Accessed May 2021. [https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty\\_ca/0-0-0-71505](https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-71505).

DTSC (California Department of Toxic Substances Control). 2020. "EnviroStor Database." Accessed December 2020. <http://www.envirostor.dtsc.ca.gov/public>.

EDD (Employment Development Department). 2021. "Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA)." September 17, 2021. Accessed September 2021. [https://www.labormarketinfo.edd.ca.gov/file/lfmonth/rive\\$pds.pdf](https://www.labormarketinfo.edd.ca.gov/file/lfmonth/rive$pds.pdf).

EIA (Energy Information Administration). 2019. "California State Profile and Energy Estimates – Table F16: Total Petroleum Consumption Estimates, 2017." <https://www.eia.gov/state/seds/seds-data-complete.php?sid=CA>.

EPA (U.S. Environmental Protection Agency). 2004. User's Guide for the AMS/EPA Regulatory Model – AERMOD. September 2004. Accessed January 2020. [www3.epa.gov/scram001/7thconf/aermod/aermodugb.pdf](http://www3.epa.gov/scram001/7thconf/aermod/aermodugb.pdf).

- EPA. 2020. "Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes." Updated July 16, 2020. <https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes#mixed>.
- EPA. 2019. AERMOD Implementation Guide. Accessed August 2019. [https://gaftp.epa.gov/Air/aqmg/SCRAM/models/preferred/aermod/aermod\\_implementation\\_guide.pdf](https://gaftp.epa.gov/Air/aqmg/SCRAM/models/preferred/aermod/aermod_implementation_guide.pdf).
- EPA. 2020. "Defining Hazardous Waste: Listed, Characteristic and Mixed Radiological Wastes." Updated July 16, 2020. <https://www.epa.gov/hw/defining-hazardous-waste-listed-characteristic-and-mixed-radiological-wastes#mixed>.
- FEMA. 2020. Flood Insurance Rate Map. Accessed December 2020. <https://msc.fema.gov/portal/home>.
- FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model (RCNM), Software Version 1.1. U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division. Washington, D.C. December 8, 2008.
- FICON (Federal Interagency Committee on Noise). 1992. Federal Agency Review of Selected Airport Noise Analysis Issues. August 1992.
- FTA (U.S. Department of Transportation, Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. September 2018.
- FWC (Fontana Water Company). 2016. 2015 Urban Water Management Plan. June 2016. [https://www.fontanawater.com/wp-content/uploads/2018/10/San-Gabriel-Fontana\\_Amended-Final-December-2017-1.pdf](https://www.fontanawater.com/wp-content/uploads/2018/10/San-Gabriel-Fontana_Amended-Final-December-2017-1.pdf).
- IEUA (Inland Empire Utilities Agency). 2016a. "2015 Regional Water Recycling Plant No. 1." Accessed December 2020. <https://www.ieua.org/facilities/rp-1/>.
- IEUA. 2016b. 2015 Urban Water Management Plan. June 2016. Accessed December 2020. <https://18x37n2ovtbb3434n48jhbs1-wpengine.netdna-ssl.com/wp-content/uploads/2016/07/FINAL-IEUA-WFA-2015-UWMP-2016-07-07.pdf>.
- IPCC (Intergovernmental Panel on Climate Change). 2007. IPCC Fourth Assessment Synthesis of Scientific-Technical Information Relevant to Interpreting Article 2 of the U.N. Framework Convention on Climate Change.
- ITE (Institute of Transportation Engineers). 2017. Trip Generation Manual. 10th ed. Johnson Controls. 2015. York Technical Guide. R-410A ZE/ZF/ZR/XN/XP SERIES, 3 - 6 TON 60 Hertz. 251933-YTG-Y-0715.
- NETR (Nationwide Environmental Title Research). 2020. Historic Aerials. Accessed October 2020. <https://www.netronline.com>.

- OEHHA (Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments. Accessed February 2015. <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.
- OPR (California Governor’s Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December 2018. Accessed November 2020. [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).
- OSHA (Occupational Safety and Health Administration). 2020. “Hazard Communication Standard: Safety Data Sheets.” Accessed December 2020. <https://www.osha.gov/Publications/OSHA3514.html>.
- SANBAG (San Bernardino Associated Governments). 2016. San Bernardino County Congestion Management Program – 2016 Update. Accessed December 2020. <https://www.gosbcta.com/wp-content/uploads/2019/10/2016-Congestion-Management-Plan-.pdf>.
- SARWQCB (Santa Ana Regional Water Quality Control Board). 2010. National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino within the Santa Ana Region. January 29, 2010. [https://www.waterboards.ca.gov/santaana/board\\_decisions/adopted\\_orders/orders/2010/10\\_036\\_SBC\\_MS4\\_Permit\\_01\\_29\\_10.pdf](https://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_036_SBC_MS4_Permit_01_29_10.pdf).
- SARWQCB. 2013. Technical Guidance Document for Water Quality Management Plans. June 21, 2013. <https://www.cityofmontclair.org/home/showdocument?id=4910>.
- SBCOG (San Bernardino Council of Governments). 2021. Public Draft San Bernardino County Regional Greenhouse Gas Reduction Plan. February 2021. [https://www.gosbcta.com/wp-content/uploads/2019/09/San-Bernardino-County-Regional-GHG-Reduction-Plan\\_Main-Text\\_Feb-2021.pdf](https://www.gosbcta.com/wp-content/uploads/2019/09/San-Bernardino-County-Regional-GHG-Reduction-Plan_Main-Text_Feb-2021.pdf)
- SCAG (Southern California Association of Governments). 2001. Employment Density Study Summary Report. October 31, 2001. Accessed November, 2020. <http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf>.
- SCAG. 2016a. 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy. Adopted April 7, 2016. Accessed November 2017. <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>.
- SCAG. 2016b. “Demographics & Growth Forecast: 2016 RTP Growth Forecast.” April 2016. [http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf).
- SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

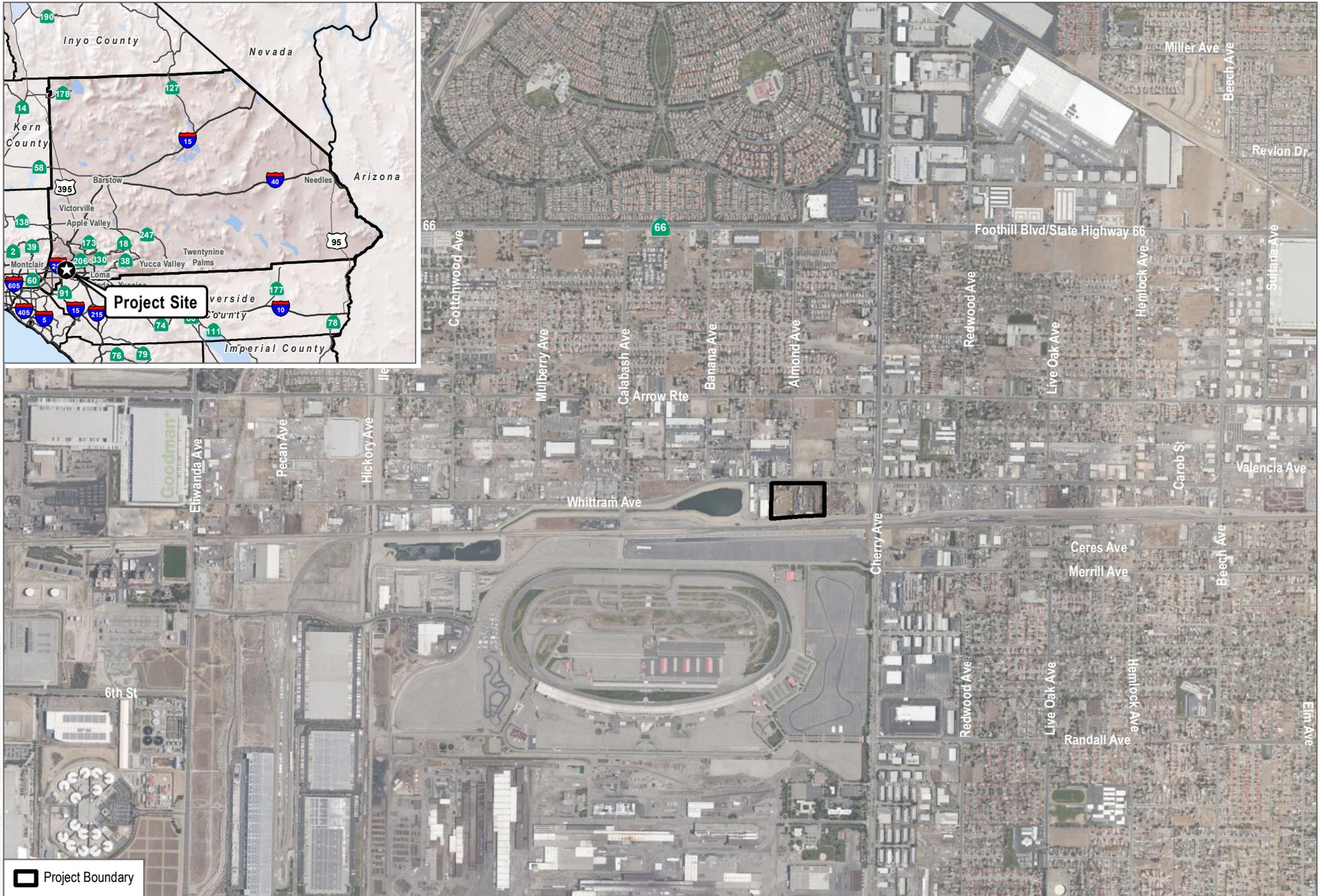
- SCAQMD. 2003a. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. August 2003. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf?sfvrsn=2>.
- SCAQMD. 2003b. Final 2003 AQMP Appendix V Modeling and Attainment Demonstrations. August 2003. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf?sfvrsn=2>.
- SCAQMD. 2007. Rule 1403, Asbestos Emissions from Demolition/Renovation Activities. Adopted October 6, 1989; as amended October 5, 2007. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.
- SCAQMD. 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October 2008.
- SCAQMD. 2009. Final Localized Significance Threshold Methodology. Revised July 2009.
- SCAQMD. 2010. “Greenhouse Gases CEQA Significance Thresholds Working Group Meeting No. 15.” September 28, 2010. Accessed August 2016. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2).
- SCAQMD. 2014. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website last updated in 2014. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2>.
- SCAQMD. 2017. Final 2016 Air Quality Management Plan. March 2017. Accessed January 2020. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>.
- SCAQMD. 2019. “SCAQMD Air Quality Significance Thresholds.” Originally published in CEQA Air Quality Handbook, Table A9-11-A. Revised April 2019. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.
- SCAQMD. 2020. “SCAQMD Modeling Guidance for AERMOD.” Accessed June 2020. <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>.
- SCE (Southern California Edison). 2019. 2018 Power Content Label (for 2016).
- SJVAPCD (San Joaquin Valley Air Pollution Control District). 2006.
- SoCalGas (Southern California Gas). 2018. “Company Profile.” Accessed June 2020. <https://www.socalgas.com/about-us/company-profile>.
- SWRCB (State Water Resources Control Board). 2020a. “GeoTracker Database.” Accessed December 2020. <http://geotracker.waterboards.ca.gov/>.

SWRCB. 2020a. "Storm Water Program: Construction Storm Water Program." Updated January 03, 2020. Accessed December 2020. [http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/construction.shtml](http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml).

The Climate Registry. 2020. Default Emission Factors. May 1, 2020. Accessed April 2020. <https://www.theclimateregistry.org/wp-content/uploads/2020/04/The-Climate-Registry-2020-Default-Emission-Factor-Document.pdf>.

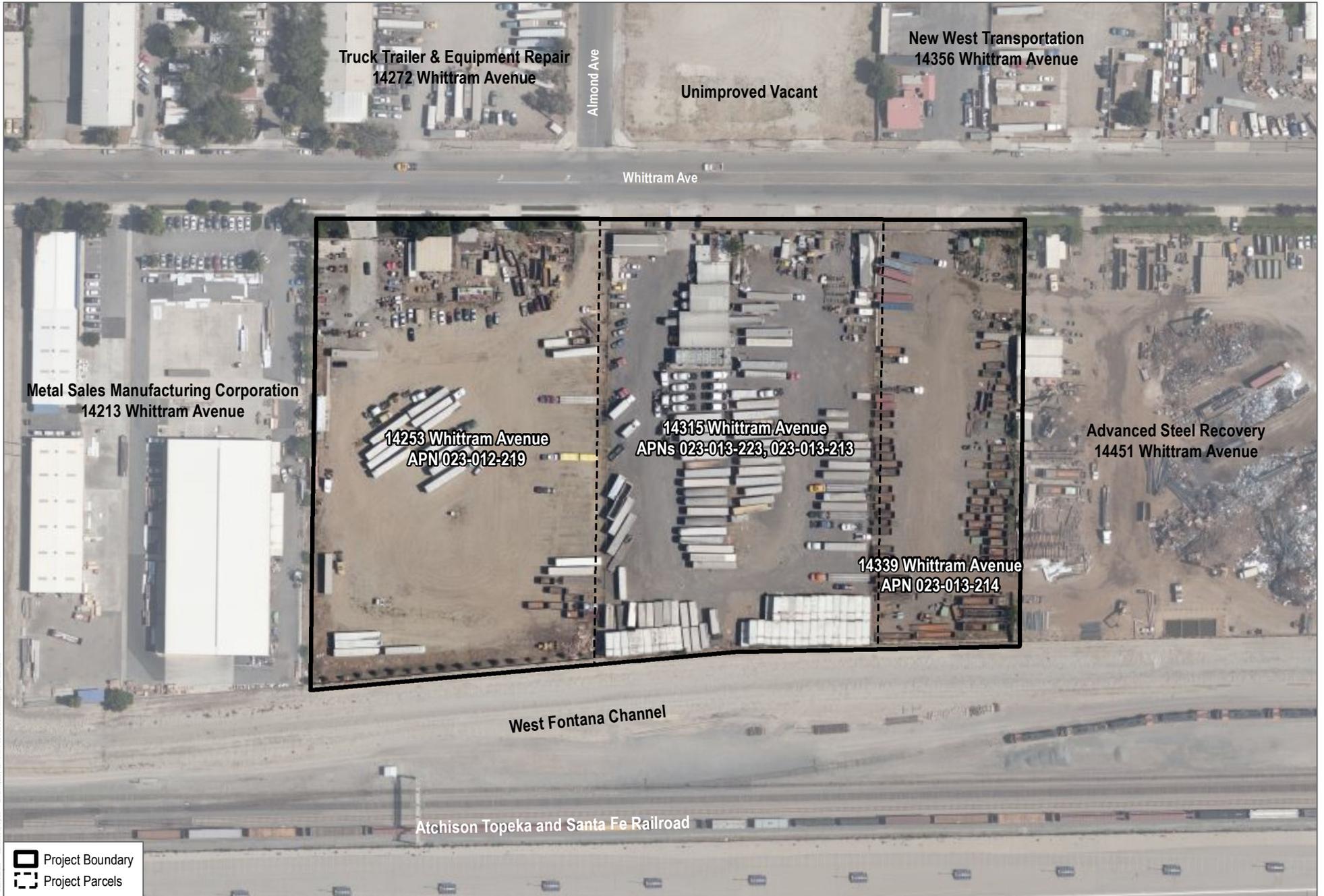
U.S. Census Bureau. 2016. *2012-2016 American Community Survey 5-Year Estimates*. Accessed November 2020. <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

USDA (U.S. Department of Agriculture). 2020. Web Soil Survey. USDA, Natural Resources Conservation Service, Soil Survey Staff. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.



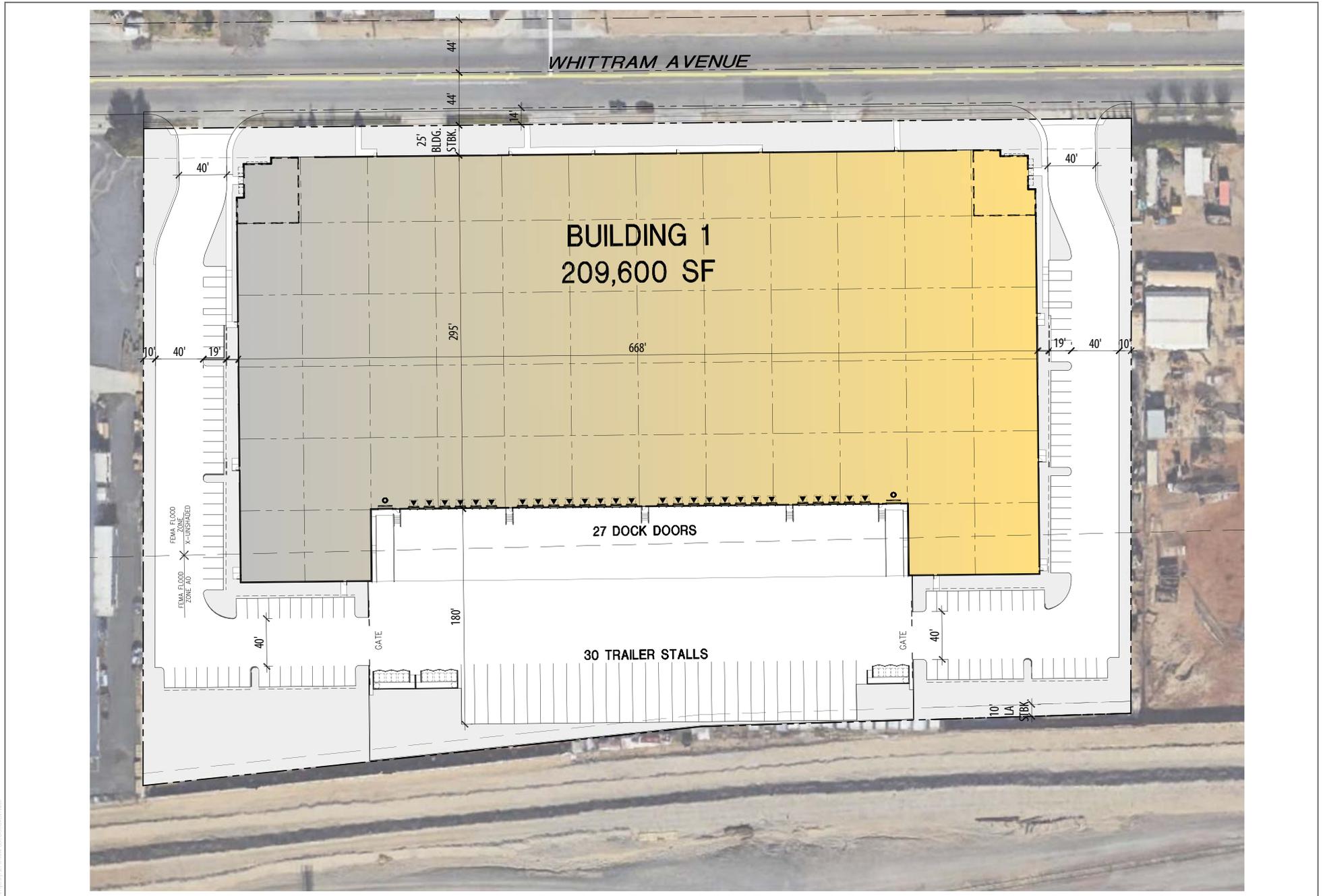
SOURCE: County of San Bernardino 2020; Bing Maps

**FIGURE 1**  
**Project Location**  
 Whittram Avenue Warehouse Project



SOURCE: County of San Bernardino 2020; Bing Maps

**FIGURE 2**  
Existing Project Site



SOURCE: GAAArchitecture, 2020

**FIGURE 3**  
Site Plan



ENLARGED WEST ELEVATION | 1/8"=1'-0" | 8



ENLARGED NORTH ELEVATION | 1/8"=1'-0" | 6



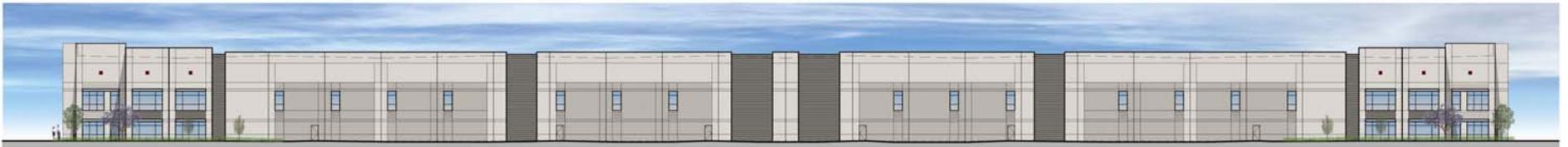
ENLARGED EAST ELEVATION | 1/8"=1'-0" | 7



EAST ELEVATION | 1"=20'-0" | 5



WEST ELEVATION | 1"=20'-0" | 4



NORTH ELEVATION | 1"=20'-0" | 3



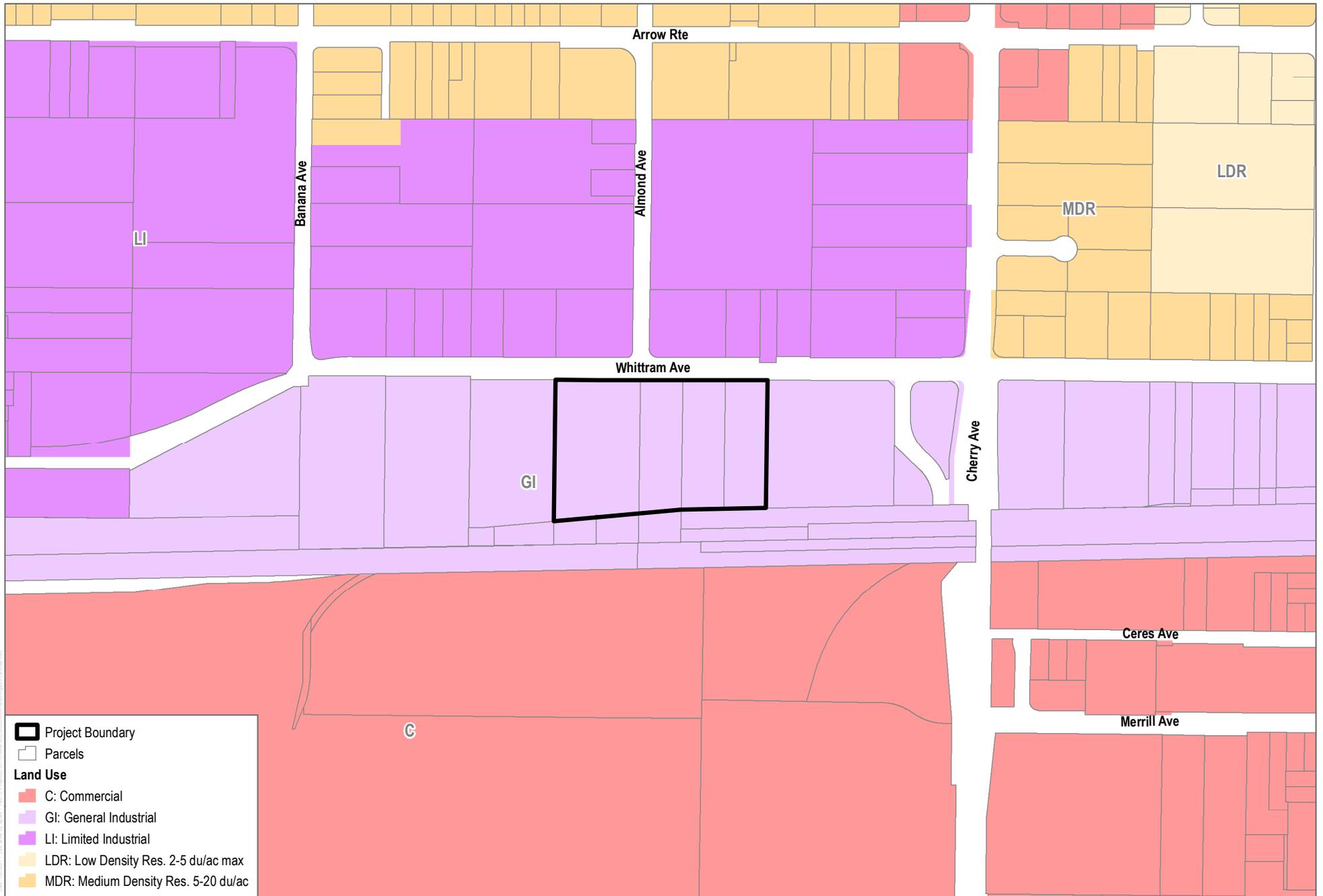
SOUTH ELEVATION | 1"=20'-0" | 2

SOURCE: GAAArchitecture, 2020

**DUDEK**

**FIGURE 4**

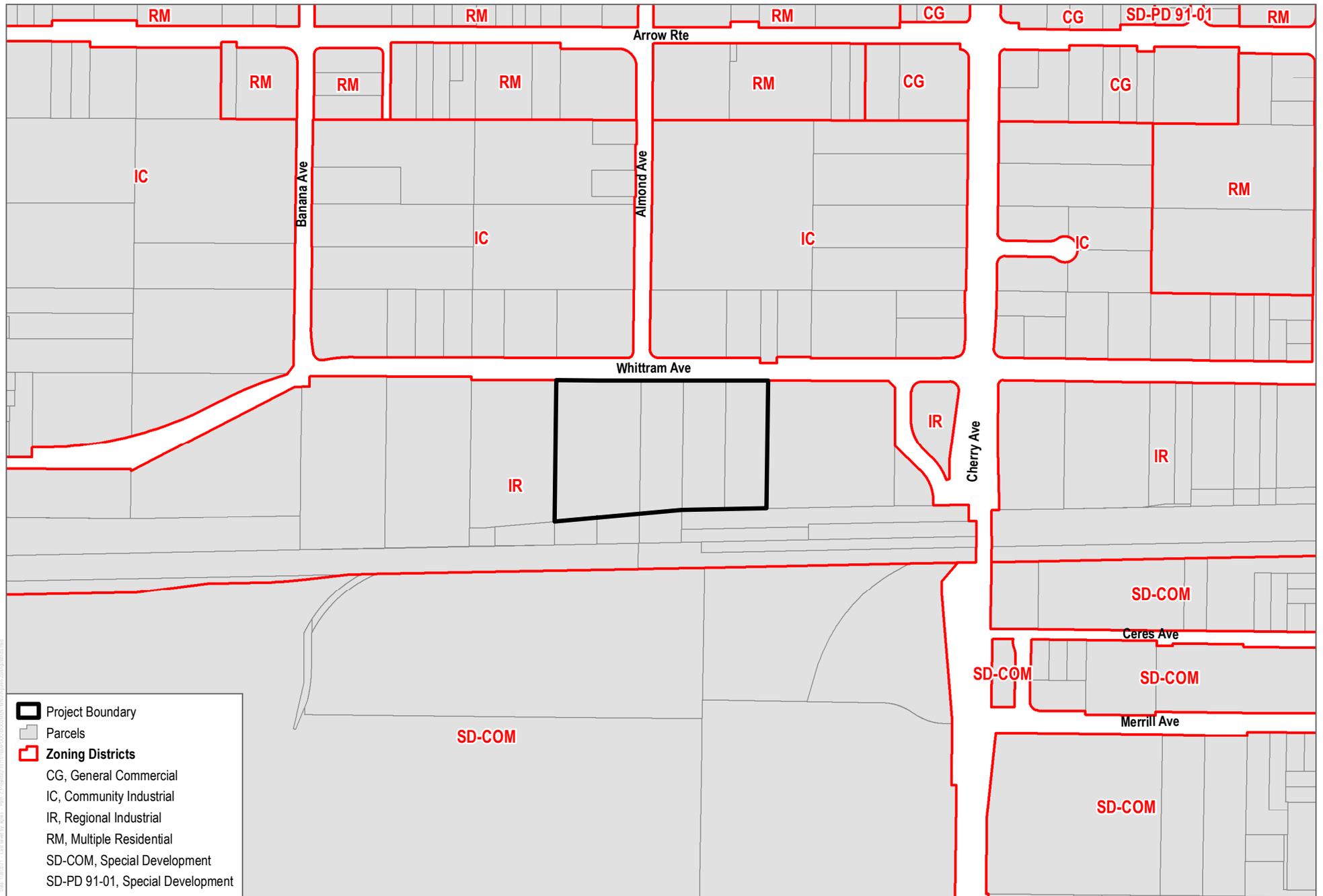
Conceptual Elevations  
Whittram Avenue Warehouse Project



SOURCE: County of San Bernardino 2020; Bing Maps

**FIGURE 5**

**Land Use**



SOURCE: County of San Bernardino 2020; Bing Maps



**FIGURE 6**

**Zoning Districts**

Whittram Avenue Warehouse Project



SOURCE: USGS National Map 2021

**FIGURE 7**  
**Noise Measurement Locations**  
 Whittram Avenue Warehouse Project