MITIGATED NEGATIVE DECLARATION

City of San Bernardino Applications:

Subdivision 22-01 (SUB22-01)
Development Permit – D/ERC 22-04 (DP-D22-04)

Property located on APNs 0136-041-10 and 0136-051-54 and located at the southeast corner of Arrowhead Avenue and Rialto Avenue, City of San Bernardino, CA

LEAD AGENCY:

City of San Bernardino
Community & Economic Development Department - Planning Division
201 North E. Street, 3rd Floor
San Bernardino, CA 92401
Case Planner: Travis Martin
Phone: (909) 384-5313
martin_tr@sbcity.org

PROJECT APPLICANT:

119 Arrowhead LLC
Contact: Matt Englhard
117777 San Vicente Boulevard, Suite 780
Los Angeles, CA 90049

September 14, 2023

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F	Greenhouse Gas Analysis
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G2	Phase II ESA
G3	Soil Removal Workplan
G4	Soil Management Plan
H1	Hydrology Study
H2	Preliminary Water Quality Management Plan (WQMP)
I	Noise Study
J1	Vehicle Miles Traveled (VMT) Analysis
J2	Traffic Analysis

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
§	Section
°F	Fahrenheit
A/C	air conditioning
AB	Assembly Bill
AB 1346	Assembly Bill 1346
AB 1493	Assembly Bill 1493, California's Clean Car Standards
AB 2286	Assembly Bill 2286
af	acre-foot
AFY	acre-foot per year
amsl	above mean sea level
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BACM	best available control measures
BFSA	Brian F. Smith and Associates, Inc.
bgs	below ground surface
BMP	Best Management Practice
BRTR	Biological Resources Technical Report
c	capacity
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aides Noise Abatement
CADRE	CADRE Environmental, Inc.
CAL FIRE	California Department of Forestry and Fire
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
CalSTRA	California State Transportation Agency
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBSC	California Building Standards Commission
CCR	California Code of Regulations

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
cfs	cubic feet per second
CH	Commercial Heavy
CH_4	methane
CMP	Corrugated Metal Pipe
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO	Commercial Office
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utility Commission
CREC	Controlled Recognized Environmental Condition
CRS	Cultural Resources Study
CTC	California Transportation Commission
CWA	Clean Water Act
cy	cubic yards
dBA	a-weighted decibel
DCA	Development Code Amendment
DCV	Design Capture Volume
D/ERC	Development/Environmental Review Committee
DIF	Development Impact Fees
DMA	Drainage Management Area
DOF	Department of Finance
DP	Development Permit
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
EA	Environmental Assessment
EA	Existing Plus Ambient
EAC	Existing Plus Ambient Plus Cumulative
EHS	Environmental Health Services
EI	Expansion Index
EIR	Environmental Impact Report
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GCC	Global Climate Change
GHG	greenhouse gas
GHGA	South Arrowhead Greenhouse Gas Analysis
GOBiz	Governor's Office of Business and Economic Development
gpd	gallons per day
gpd	gallons per day
gpm	gallons per minute
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GVWR	Gross Vehicle Weight Rating
GWP	Global Warming Potential
HFC	hydrofluorocarbon
HHD	heavy-heavy duty trucks
HM	Hillside Management Overlay
HMBEP	Hazardous Materials Business Emergency Plan
HMC	Hazard Management Consulting, Inc.
Hp	horsepower
hp-hr-gal	horsepower hour per gallon
HRA	Health Risk Assessment

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
HREC	Historical Recognized Environmental Condition
HY	Horizon Year
IBank	California Infrastructure and Economic Development Bank
IEPR	Integrated Energy Policy Report
IL	Industrial Light
in	inches
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institution of Transportation Engineers
kg	kilogram
kWh	kilowatt hour
kWh/year	kilowatt hours per year
LDA	light-duty-auto
LDT1	light-duty-trucks below 10,000 lbs GVWR
LDT2	light-duty-trucks above 10,000 lbs GVWR
Leq	equivalent continuous sound level
LHDT	light- heavy duty truck
LID	Low Impact Development
LOS	level of service
LRA	Local Responsibility Area
LST	Localized Significance Threshold
LU	Land Use
LUC	Land Use Covenant
Lw	sound power
MATES-V	Multiple Air Toxics Exposure Study in the South Coast Air Basin
MBTA	Migratory Bird Treaty Act
MCY	motorcycle
MEIW	Maximally Exposed Individual Worker
MEIR	Maximally Exposed Individual Receptor
MEISC	Maximally Exposed Individual School Child
mg	milligram
MGD	million gallons per day
MHD	medium-heavy duty trucks
MM	Mitigation Measure

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MRZ	Mineral Resources Zone
MWS	Modular Wetlands System
MWS	Modular Wetlands System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFA	No Further Action
NIA	South Arrowhead Warehouse Noise Impact Analysis
NOD	Notice of Determination
NOI	Notice of Intent
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OPR	Office of Planning and Research
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyls
PFC	perfluorocarbons
PGA_m	Peak Ground Acceleration
PM	Particulate Matter
PM_{10}	Fine Particulate Matter (10 microns or smaller)
$PM_{2.5}$	Fine Particulate Matter (2.5 microns or smaller)
PP	Public Park
ppm	parts per million
PPV	Peak Particle Velocity
PRG	Preliminary Remedial Goal
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RMH	Residential Medium High
ROW	Right-of-Way
RPS	Renewable Portfolio Standards
RPS	Renewables Portfolio Standard

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
RS	Residential Suburban
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy, *Connect SoCal*
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
s.f.	square feet
SAWPA	Santa Ana Watershed Protection Authority
SB	Senate Bill
SB 1078	Senate Bill 1078, California's Renewable Portfolio Standards
SB 1383	Senate Bill 1383, Short-lived Climate Pollutant Reduction Law
SB 32	Senate Bill 32, California Global Warming Solutions Act: emissions limit
SB 350	Senate Bill 350, Clean Energy and Pollution Reduction Act
SB 375	Senate Bill 375, Sustainable Communities and Climate Protection Act
SB 50	Leroy F. Greene School Facilities Act
SB 743	Senate Bill 743, Implementation Assistance Project
SB 859	Senate Bill 859, Global Warming Solutions Act
SBBA	San Bernadino Basin Area
SBCFCD	San Bernadino County Flood Control District
SBCFD	San Bernadino County Fire Department
SBCM	San Bernadino County Museum
SBCUSD	San Bernadino City Unified School District
SBFD	San Bernadino Fire District
SBIA	San Bernadino International Airport
SBIAA	San Bernadino International Airport Authority
SBMWD	San Bernadino Municipal Water Department
SBPD	San Bernadino Police District
SBTAM	San Bernadino Transportation Analysis Model
SBVMWD	San Bernadino Valley Municipal Water District
SBWRP	San Bernadino Water Reclamation Plant
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
sec	seconds
SEO	socio-economic data
SF_6	sulfur hexafluoride
SGC	Strategic Growth Council
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Office

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
SJVUAPCD	San Joaquin Unified Air Pollution Control District
SLCP	Short-lived Climate Pollutants
SLPS	Short-Lived Climate Pollutant Strategy
SMP	Soil Management Plan
SORE	small off-road engine
SO_x	Sulfur Oxides
SP	service population
SR-330	State Route 330
SR-79	State Route 79
SRA	Source Receptor Area
SRA	State Responsibility Area
STLC	soluble lead
SUB	Subdivision
SWMD	Solid Waste Management Division
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resources Control Board
TA	Traffic Analysis
TA	Traffic Impact Analysis
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone
TEA-21	Transportation Equity Act for the 21st Century
tpd	tons per day
TPH	total petroleum hydrocarbons
TPM	Transportation Demand Measures
tpy	tons per year
TTLC	total lead
USACE	United States Army Corps of Engineers
USAF	United States Air Force
USCB	United States Census Bureau
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Services
v	volume
v/c	volume-to-capacity ratio
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
vph	vehicles per hour

ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

Acronym	Definition
WDR	Waste Discharge Requirements
WQMP	Water Quality Management Plan
WRPMP	Water Reclamation Plant Master Plan
XRF	X-Ray Fluorescence

1.0 Introduction

1.1 Document Purpose

This document is a Mitigated Negative Declaration (MND) prepared in accordance with the California Environmental Quality Act (CEQA), including all criteria, standards, and procedures of CEQA (California Public Resource Code Sections 21000 et seq.), the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.), and the City of San Bernardino's local guidelines for implementing the CEQA (see CEQA Guidelines Section 15064.7). This MND is an informational document intended for use by the City of San Bernardino, any Trustee and/or Responsible agencies, and members of the general public in evaluating the physical environmental effects of the proposed San Bernardino Gateway Business Park project (hereafter referred to as "Project" and as described in further detail in Section 3.0 of this MND).

This MND was compiled by the City of San Bernardino, serving as the Lead Agency for the proposed Project pursuant to CEQA Section 21067 and CEQA Guidelines Article 4 and Section 15367. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project.

The construction and operation of the proposed Project is considered to be a "project" under CEQA and, as a result, the Project is subject to the City of San Bernardino's environmental review process. The primary purpose of CEQA is to ensure that decision-makers and the public are aware of the environmental implications of a specific action or project and to determine whether the proposed project will have the potential to cause significant adverse impacts on the environment. As part of the proposed Project's environmental review process, the City of San Bernardino prepared an Environmental Checklist Form (also referred to as the "Initial Study"), which is included herein in Section 4.0.

1.2 Project Overview

The proposed Project evaluated herein consists of applications for a Subdivision (SUB22-01) and a Development Permit – D/ERC (DP-D22-04) to allow for the construction and operation of three non-refrigerated manufacturing/business park buildings on a 10.4 net-acre property located at the southeast corner of Arrowhead Avenue and Rialto Avenue. SUB22-01 is proposed to establish separate legal parcels for each of the three proposed buildings. DP-D22-04 is required for the proposed manufacturing/business park uses by the site's underlying zoning classification of "CH (Commercial Heavy)," and approval of DP-D22-04 would allow for development of the Project site with three manufacturing/business park buildings. Building 1 is proposed in the western portion of the site, and would include 106,755 s.f. of building area. Building 2 is proposed in the central portion of the Project site, and would include 50,432 s.f. of building area. Building 3 is proposed in the eastern portion of the Project site, and would contain 73,133 s.f. of building area. Access to the Project site is proposed via one driveway entrance along Arrowhead Avenue, two driveway entrances along Rialto Avenue, and two driveway entrances from Sierra Avenue. Please refer to Section 3.0 for a comprehensive description of the proposed Project.

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

1.3.1 CEQA Objectives

CEQA, a statewide environmental law contained in Public Resources Code Sections 21000 to 21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies inform themselves of the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information.

1.3.2 CEQA Requirements for a Mitigated Negative Declaration (MND)

A Mitigated Negative Declaration (MND) is a written statement by the Lead Agency that briefly describes the reasons why a project that is not exempt from the requirements of CEQA will not have a significant effect on the environment and, therefore, does not require preparation of an Environmental Impact Report (EIR) (CEQA Guidelines Section 15371). The CEQA Guidelines require the preparation of a MND if the Initial Study prepared for a project identifies potentially significant environmental effects, but: 1) revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and 2) there is no substantial evidence, in light of the whole record before the Lead Agency, that the project may have a significant effect on the environment.

1.3.3 Environmental Checklist/Initial Study Findings

Section 4.0 of this document contains the Environmental Checklist Form/Initial Study that was prepared for the proposed Project pursuant to CEQA and City of San Bernardino requirements. The Initial Study determined that implementation of the proposed Project would not result in significant environmental effects to the following environmental resource areas: aesthetics, agriculture/forestry resources, air quality, energy, greenhouse gas emissions, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, utilities/service systems, and wildfire. The Initial Study determined that the proposed Project would result in potentially significant effects to the resource areas of biological resources, cultural resources, geology/soils (paleontological resources), hazards/hazardous materials, and tribal cultural resources but the Project Applicant has agreed to implement mitigation measures that would avoid or reduce the effects to a point where clearly no significant effects would occur. The Initial Study determined that, with the incorporation of mitigation measures, there is no substantial evidence in light of the whole record before the Lead Agency (City of San Bernardino) that the Project would have a significant effect on the environment. Based on the Initial Study's findings, the City of San Bernardino determined that an MND is appropriate for the proposed Project pursuant to CEQA Guidelines Section 15070(b).

1.3.4 Format and Content of Mitigated Negative Declaration

The following components comprise the MND in its entirety:

1) This document, including all sections. Section 4.0 includes the completed Environmental Checklist form (also referred to as the "Initial Study") and its associated analyses which document the reasons to support the findings and conclusions of the Initial Study. Section 6.0 comprises the Mitigation Monitoring and Reporting Program (MMRP), which lists all mitigation measures imposed on the proposed Project to ensure that the physical effects to the environment that result from implementation of the Project are reduced to less-than-significant levels. The MMRP also indicates the required timing for the implementation of each mitigation measure and identifies the parties responsible for implementing and monitoring each mitigation measure.

2) Seventeen (17) technical reports that evaluate the environmental effects of the proposed Project are attached as *Technical Appendices A1 through J2*. Each of the appendices listed below are available for review at the City of San Bernardino Community & Economic Development Department, Planning Division, located at 201 North E Street, 3rd Floor, San Bernardino, CA 92401, and the City's website (link provided below), and are hereby incorporated by reference pursuant to CEQA Guidelines Section 15150. (https://www.sbcity.org/city_hall/community_economic_development/planning/environmental_documents)

Appendix A1	Air Quality Report
Appendix A2	Health Risk Assessment
Appendix B	Biological Resources Technical Report
Appendix C	Cultural Resources Study
Appendix D	Energy Analysis Report
Appendix E1	Geotechnical Report
Appendix E2	Paleontological Resources Assessment
Appendix F	Greenhouse Gas Analysis
Appendix G1	Phase I Environmental Site Assessment (ESA)
Appendix G2	Phase II ESA
Appendix G3	Approved Soil Management Plan
Appendix H1	Hydrology Study
Appendix H2	Preliminary Water Quality Management Plan (WQMP)
Appendix I	Noise Study
Appendix J1	Vehicle Miles Traveled (VMT) Analysis
Appendix J2	Traffic Analysis

3) All plans, policies, regulatory requirements, and other documentation that is incorporated by reference in this document pursuant to CEQA Guidelines Section 15150, including, but not necessarily limited to, the reference sources listed in Section 5.0.

1.3.5 Mitigated Negative Declaration Processing

The City of San Bernardino Community & Economic Development Department, Planning Division directed and supervised the preparation of this MND. Although prepared with the assistance of the consulting firm T&B Planning, Inc., the content contained within and the conclusions drawn by this MND reflect the sole independent judgment of the City of San Bernardino.

A Notice of Intent (NOI) to adopt the MND will be distributed to the following entities for review: 1) organizations and individuals who have previously requested such notice in writing to the City of San Bernardino; 2) owners of contiguous property shown on the latest equalized assessment roll; 3) responsible and trustee agencies (public agencies that have a level of discretionary approval over some component of the proposed Project); and 4) the San Bernardino County Clerk. The NOI identifies the location(s) where the MND, Initial Study, MMRP, and associated Technical Appendices are available for public review.

Following the public review period, the City of San Bernardino will review any comment letters received and determine whether any substantive comments were provided that may warrant revisions to the MND document. If substantial revisions are not necessary (as defined by CEQA Guidelines Section 15073.5(b)), then the MND will be finalized and forwarded to City of San Bernardino decision-makers for review as part of their deliberations concerning the proposed Project. If the Project is approved, the City of San Bernardino will adopt findings relative to the Project's environmental effects, as disclosed in this MND, and a Notice of Determination (NOD) will be filed with the San Bernardino County Clerk.

2.0 Environmental Setting

2.1 PROJECT SETTING

2.1.1 Project Location

Figure 2-1, *Regional Map*, and Figure 2-2, *Vicinity Map*, depict the location of the 10.4 net-acre Project site, which is located in the City of San Bernardino, San Bernardino County, California. The Project site is specifically located at the southeast corner of the Rialto Avenue and Arrowhead Avenue intersection. The Project site comprises San Bernardino County Assessor Parcel Numbers (APNs) 0136-041-10 and 0136-051-54. The Project site is located in Section 10, Range 4 West, Township 1 South, San Bernardino Baseline and Meridian.

2.1.2 Surrounding Land Uses and Development

The land uses surrounding the Project site are described below and are illustrated on Figure 2-3, *Surrounding Land Uses and Development*.

- North: West Rialto Avenue forms the northern boundary of the Project site. The area north of West Rialto Avenue is zoned for "CO (Commercial Office) and "RMH (Residential Medium High)" land uses, and is currently developed with commercial office uses and multi-family dwelling units.

- South: Immediately to the south of the Project site is an existing unvegetated concrete flood control channel and an existing railroad line that is operated by the Southern California Regional Rail Authority (Metrolink). Lands to the south of the railroad tracks are zoned for "Commercial Heavy (CH)" land uses, and are developed with a mixture of commercial, warehouse, and residential uses.

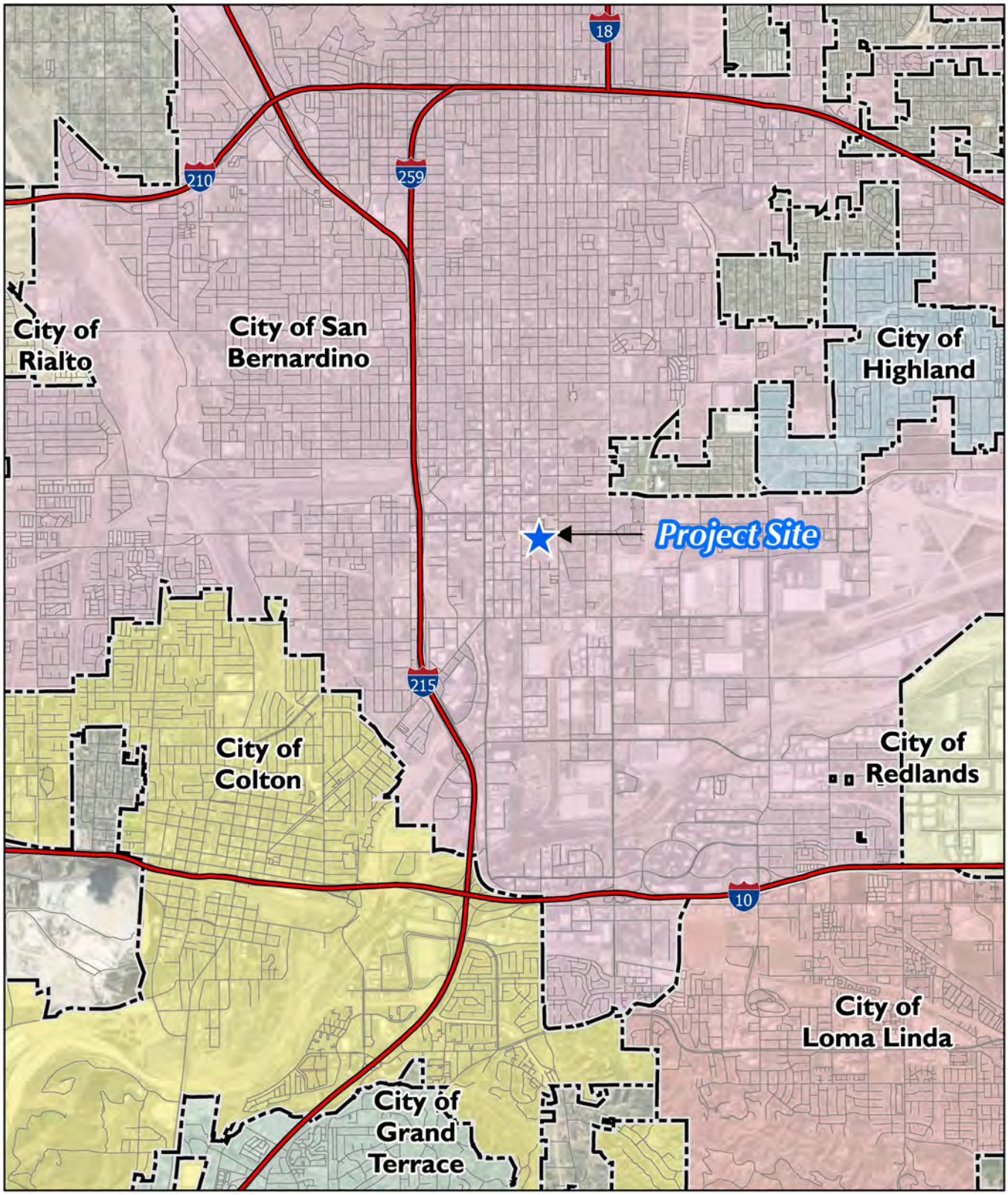
- West: South Arrowhead Avenue forms the western boundary of the Project site. Lands to the west of South Arrowhead Avenue are zoned for CH land uses, with areas further west zoned for "IL (Industrial Light" land uses. This area is developed with commercial uses, beyond which are warehouses and undeveloped land.

- East: South Sierra Way forms the eastern boundary of the Project site. Lands to the east of South Sierra Way are zoned for CH land uses, with lands further to the east zoned for "PP (Public Park)" and "RS (Residential Suburban)" land uses. These areas are developed with commercial uses, residential dwelling units (both single family and multifamily), and a park (Meadowbrook Recreation Park). An existing school, the H. Frank Dominguez Elementary School, occurs approximately 0.2-mile east of the Project site (east of South Allen Street).

2.2 PLANNING CONTEXT

2.2.1 General Plan Land Use Designation

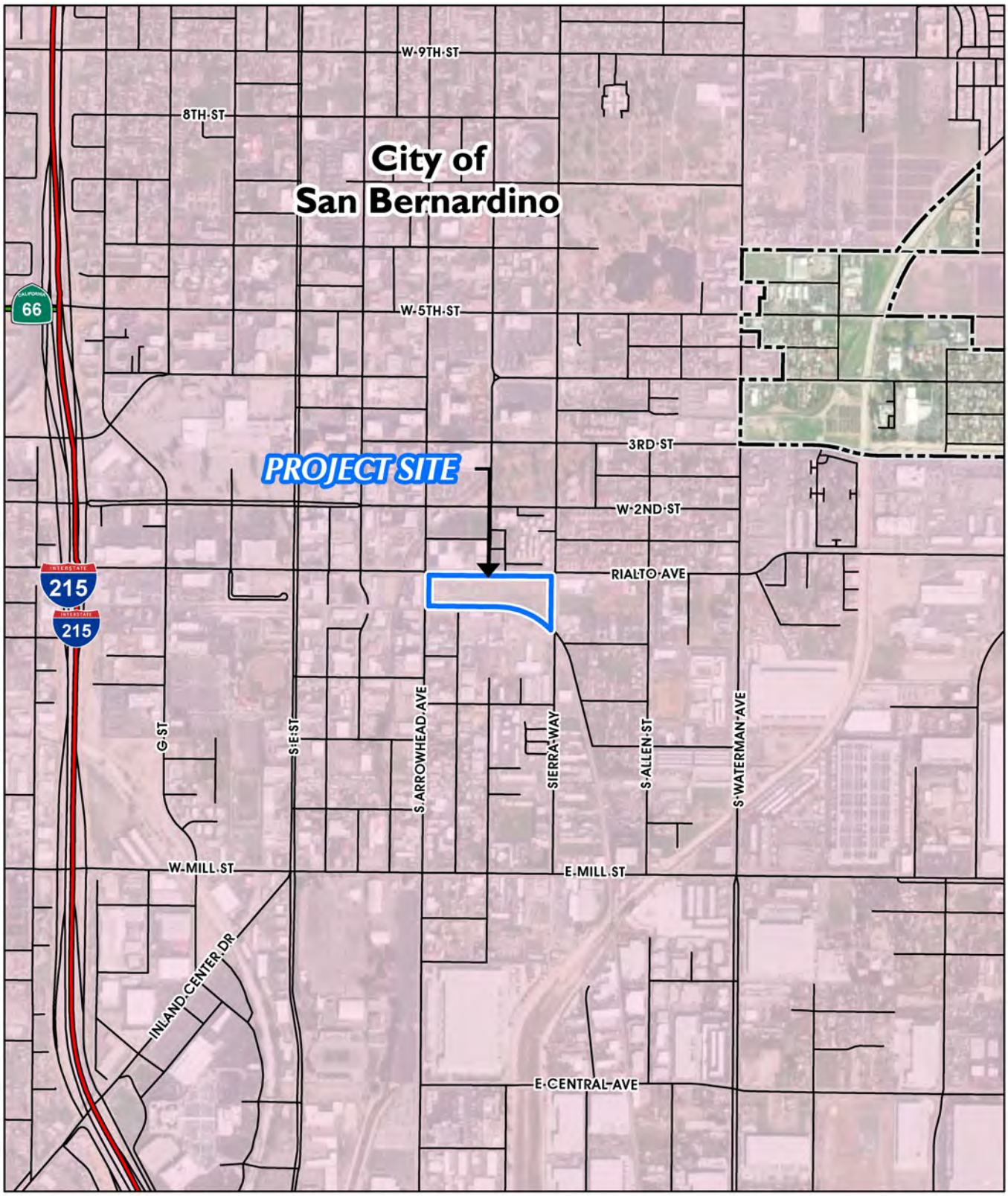
The prevailing planning document for the Project site and its surrounding area is the City of San Bernardino General Plan. The City of San Bernardino General Plan designates the Project site for "Commercial Heavy (CH)" land uses, as shown on Figure 2-4, *Existing General Plan Land Use Map*. The CH land use designation is intended



Source(s): Esri, Nearmap Imagery (2022)

Figure 2-1

Regional Map

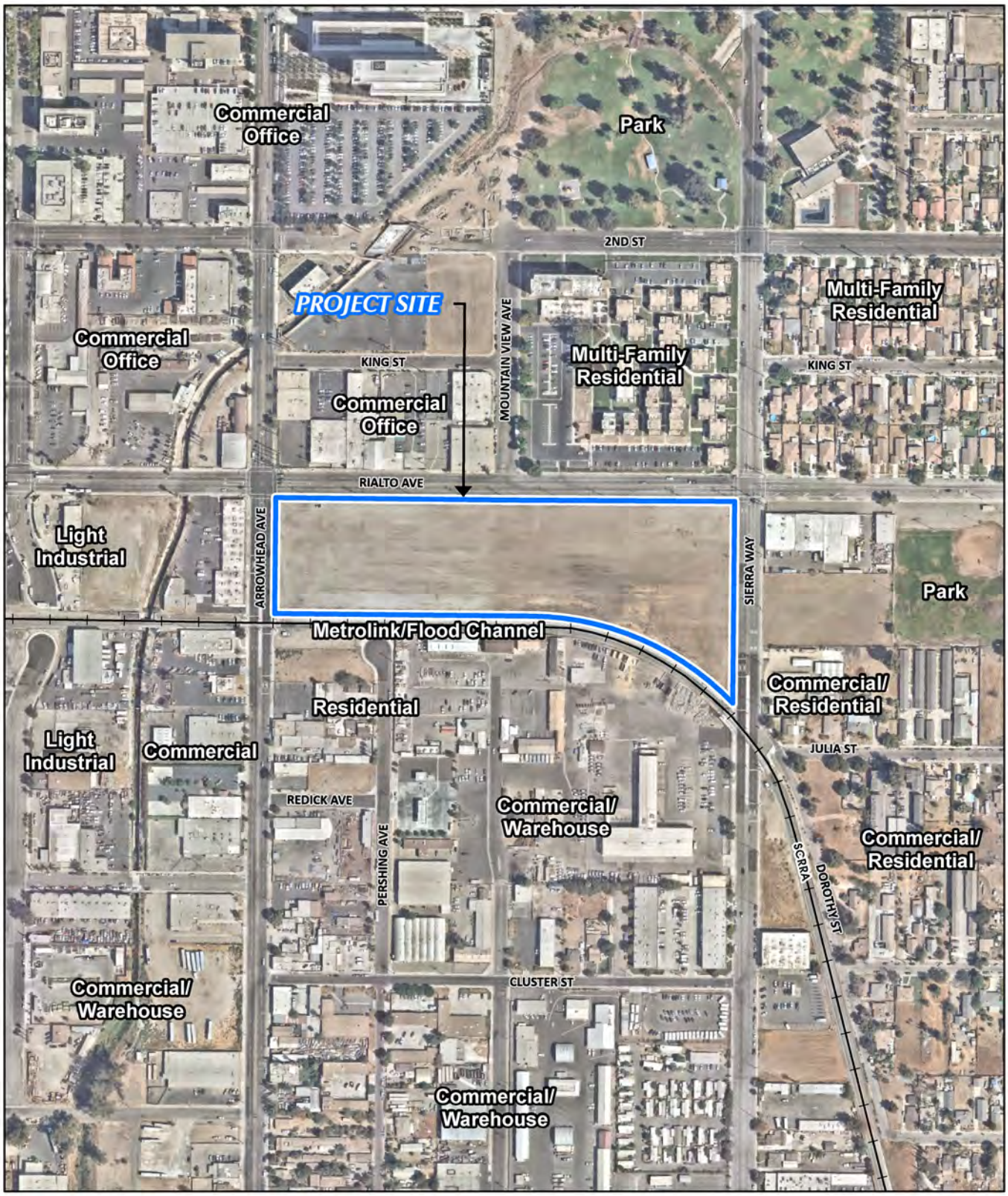


Source(s): Esri, Nearmap Imagery (2022)

Figure 2-2

0 375 750 1,500 Feet

Vicinity Map

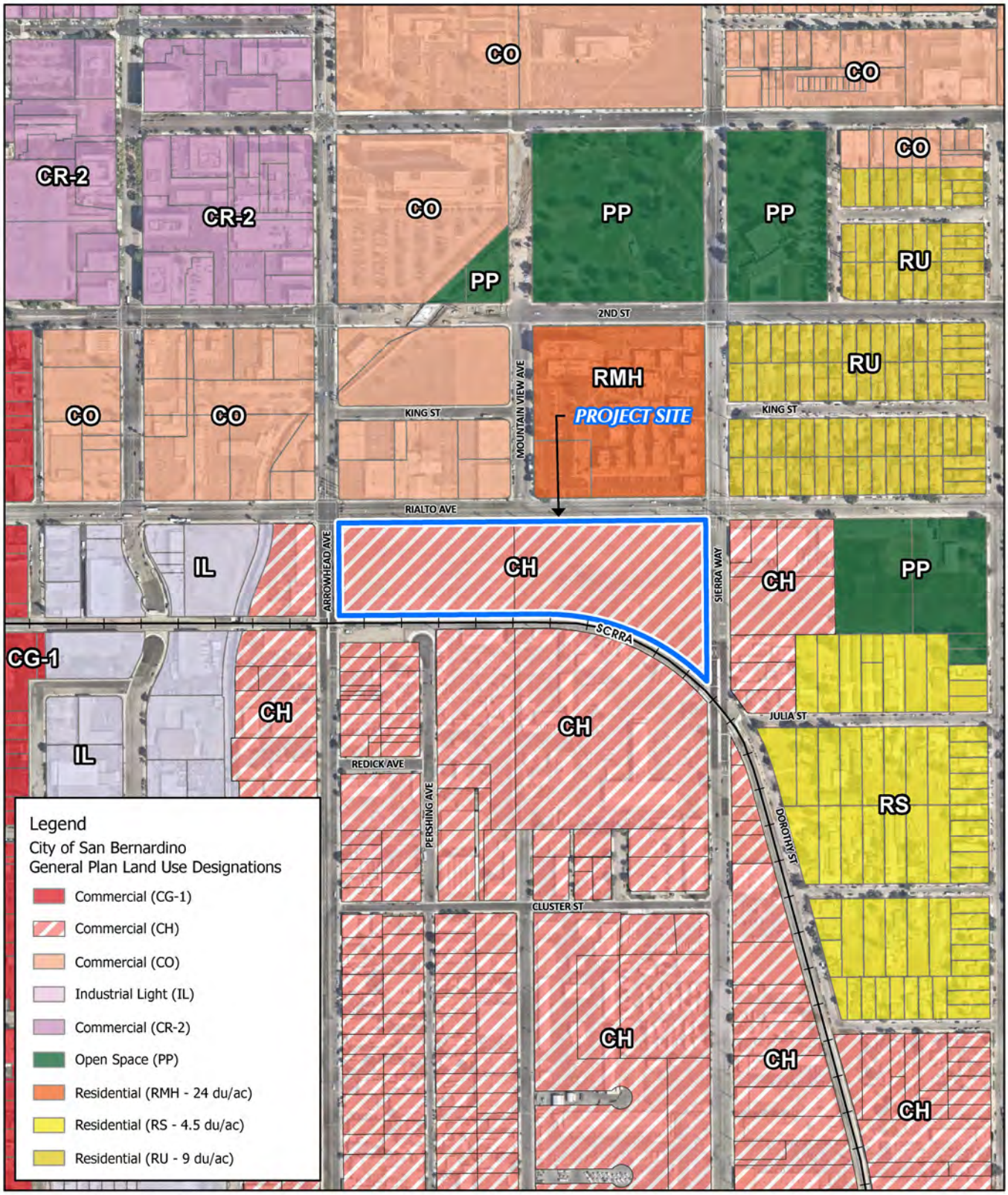


Source(s): Esri, Nearmap Imagery (2022)

Figure 2-3

0 100 200 400 Feet

Surrounding Land Uses and Development



Source(s): Esri, Nearmap Imagery (2022), SB County (2022), City of San Bernardino (2005)

Figure 2-4

0 125 250 500 Feet

Existing General Plan Land Use Map

to accommodate large scale, regional serving retail and service uses and limited commercial and industrial uses that are characterized by an extensive use of outdoor or indoor space for their sales, service, and/or storage. (San Bernardino, 2005a, Table LU-2)

2.2.2 Zoning Classification

As shown on Figure 2-5, *Existing Zoning Map*, the City of San Bernardino Zoning Map applies the "CH (Commercial Heavy)" zoning classification to the Project site. Development within the CH zone is subject to compliance with the standards set forth in Chapter 19.06 (Commercial Zones) of the City's Development Code. The CH zone is intended to accommodate automobile and truck sales and repair facilities, lumberyards, and related hardware sales, plant nurseries, light industrial manufacturing and storage facilities, and similar uses requiring extensive outdoor or indoor space for their sales, service, and/or storage, excluding neighborhood commercial uses. (San Bernardino, 2019, Section 19.06.010(2)(L))

2.3 EXISTING SITE CONDITIONS

Pursuant to CEQA Guidelines Section 15125(a)(1), the physical environmental condition for purposes of establishing the setting of a MND is the environment as it existed at the time the Lead Agency commences the environmental analysis for a project. The City of San Bernardino began the environmental review for the Project in February 2022; therefore, the environmental setting for the proposed Project is defined as the physical environmental conditions on the Project site and in the vicinity of the Project site as they existed as of that approximate date.

2.3.1 Land Use

As shown on Figure 2-6, *Aerial Photograph*, the Project site is disturbed and vacant/undeveloped under existing conditions. The site was previously developed as a foundry (Hanford Foundry), which was demolished in 1986, leaving the property in its current vacant state. (HMC, 2021a, pp. 7-8)

2.3.2 Aesthetics and Topographic Features

Under existing conditions, the Project site comprises relatively flat land, with elevations on site ranging from 1,012 feet above mean sea level (amsl) in the southwestern portion of the property to 1,020 feet amsl in the northeastern portion of the Project site, as shown on Figure 2-7, *USGS Topographic Map*. Overall topographic relief is approximately eight feet. As shown on Figure 2-6, the Project site is vacant and undeveloped, and does not contain any aesthetic features such as trees, rock outcroppings, or historic buildings under existing conditions. (Google Earth, n.d.)

2.3.3 Site Access and Circulation

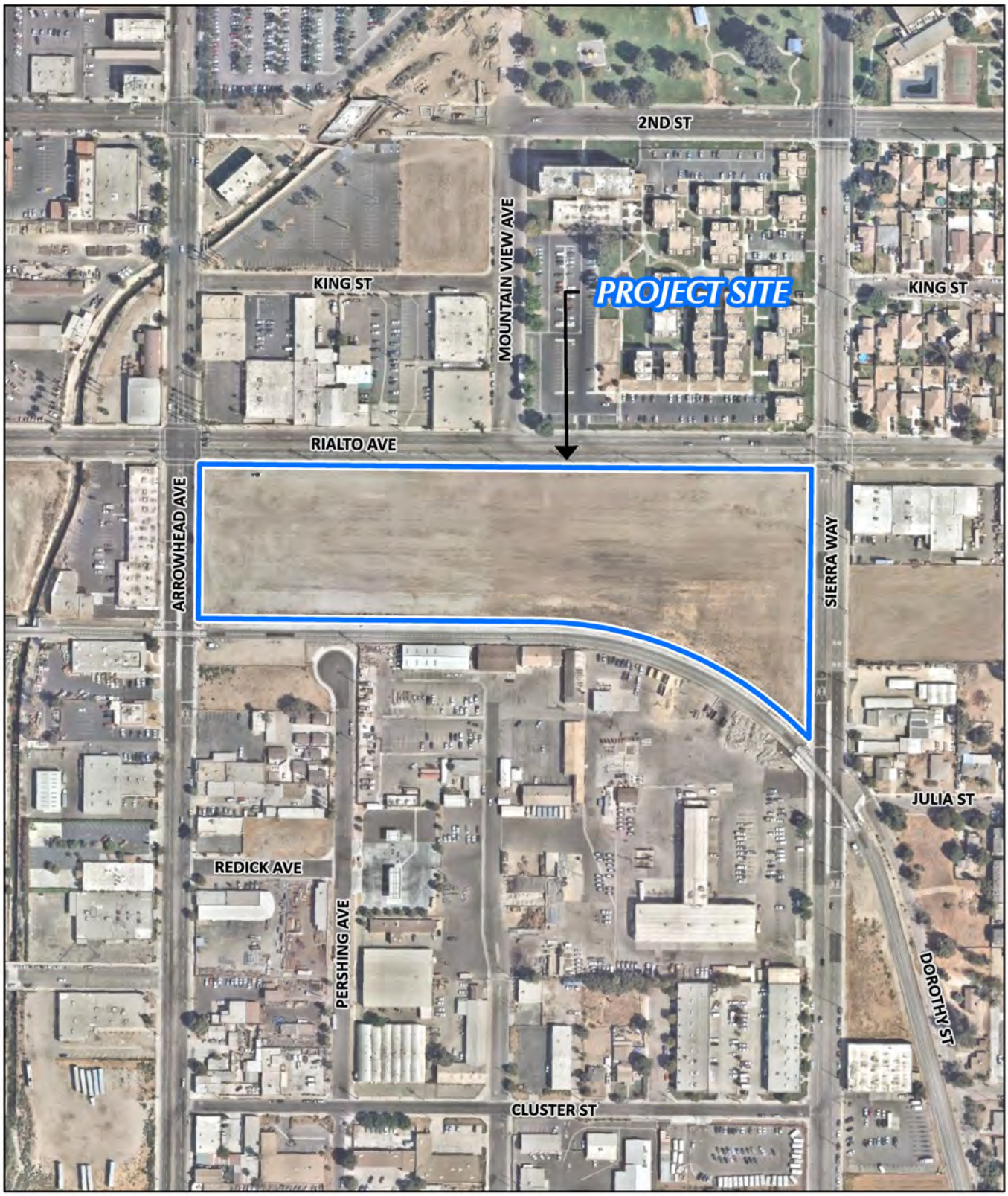
The Project site abuts South Arrowhead Avenue to the west, West Rialto Avenue to the north, and South Sierra Way to the east. The site currently includes several driveways that were previously associated with the Hanford Foundry, and include two existing driveways along South Arrowhead Avenue and six existing driveways along West Rialto Avenue, with no existing driveways along the site's frontage with South Sierra Way. (Google Earth, n.d.)

Source(s): Esri, Nearmap Imagery (2022), SB County (2022), City of San Bernardino (2007)

Figure 2-5

0 125 250 500 Feet

Existing Zoning Map

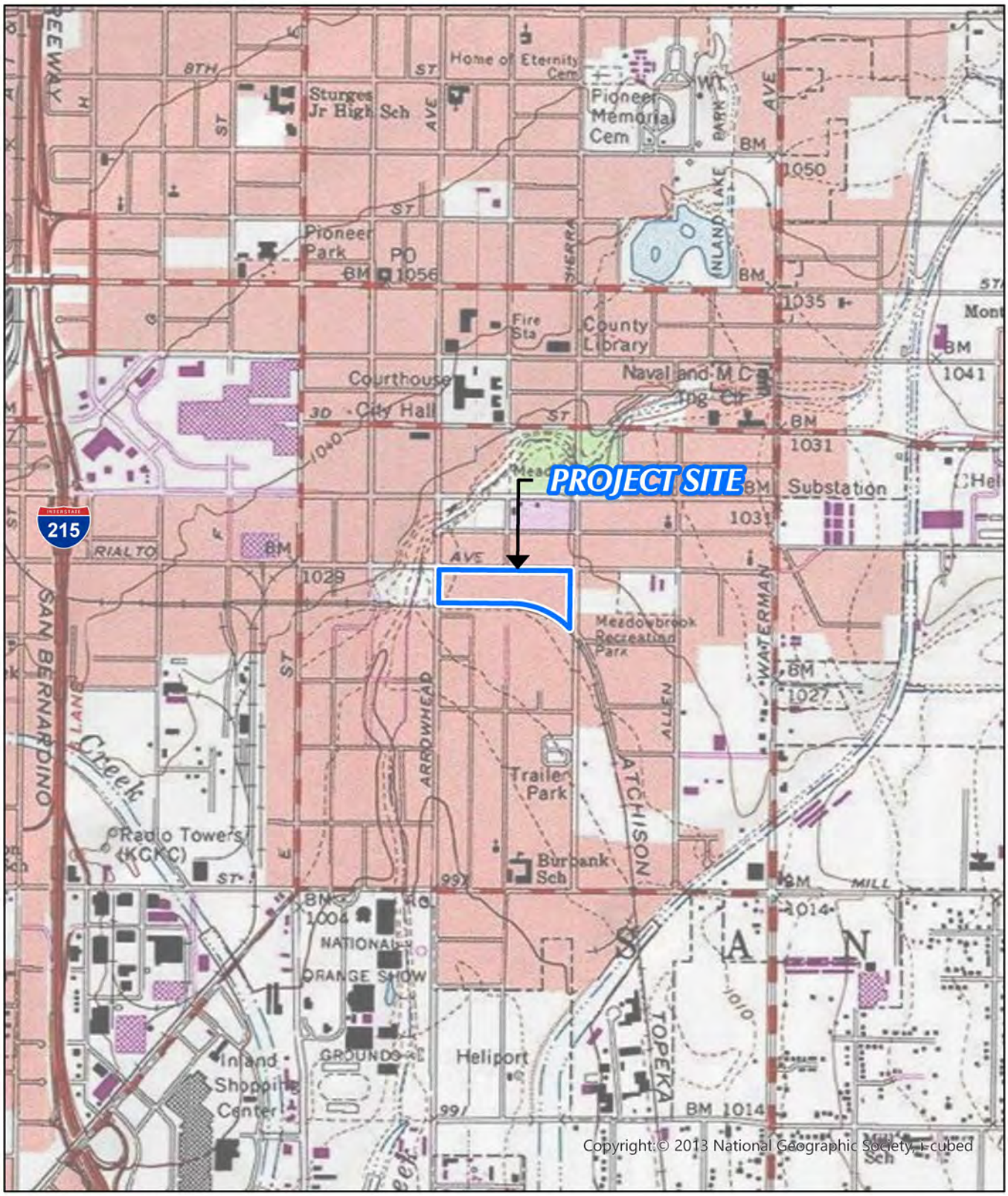


Source(s): Esri, Nearmap Imagery (2022)

Figure 2-6

0 75 150 300
Feet

Aerial Photograph



Source(s): Esri, USGS (2013)

Figure 2-7

0 350 700 1,400 Feet

USGS Topographic Map

The Project site is located approximately 0.7-mile east of Interstate 215 (I-215), 2.4 miles north of Interstate 10 (I-10), and 3.1 miles south and 4.9 miles west of State Route 210 (SR-210). I-215 is a north-south oriented freeway facility that provides a connection with I-10 and Riverside County to the south, and SR-210 and Interstate 15 (I-15) to the north. The I-10 is an east-west oriented freeway providing access to I-15 and Los Angeles County to the west and Arizona to the east. SR-210 is a north-south oriented facility in the eastern portion of the City, which transitions to an east-west oriented facility in the northern portion of the City, and provides access between I-10 in the southeast and I-215 and Los Angeles County to the west. (Google Earth, n.d.)

2.3.4 Air Quality and Climate

The Project site is located within the South Coast Air Basin (SCAB), a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the San Diego County Line to the south. The SCAB is within the jurisdiction of South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and state air quality standards. The climate of the SCAB is characterized as semi-arid and more than 90% of the SCAB's rainfall occurs from November through April. During the dry season, which also coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, characterized by a daytime onshore sea breeze and a nighttime offshore drainage wind. (Urban Crossroads, 2023a, pp. 9-10)

In the Project region, the SCAB does not attain State and/or federal standards established for one-hour and eight-hour Ozone (O_3) concentrations and particulate matter (PM_{10} and $PM_{2.5}$) concentrations. Local air quality in the vicinity of the Project site has exceeded air quality standards for one-hour and eight-hour ozone concentrations and particulate matter concentrations within the last three years, as recorded at the nearest air monitoring station to the Project site (SCAQMD Central San Bernardino Valley 1 monitoring station source receptor area [SRA] 34) (Urban Crossroads, 2023a, p. 21). Refer to Table 2-4 in the Project's air quality report (refer to *Technical Appendix A1*) for a summary of air quality conditions in the vicinity of the Project site between 2018 and 2020.

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, SCAQMD began conducting the "Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V)," Program. MATES-V has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. The Project site is located within a quadrant of the geographic grid of the MATES-V model which predicted a cancer risk of 464 per million for the area containing the Project site. Diesel Particulate Matter (DPM) is included in this cancer risk along with all other Toxic Air Contaminant (TAC) sources. As in previous MATES iterations, diesel particulate matter (PM) is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 53% lower at the 10 monitoring sites compared to MATES IV. (Urban Crossroads, 2023a, pp. 35-36)

The census tract containing the Project site (Census Tract 6071005701) is ranked by the State as being in the 86th percentile for pollution burden which, based on the Census Tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area in the 98th percentile of communities that are disproportionately burdened by multiple sources of pollution. OEHHA relies on reported demographic information of 1,580 persons living in Census Tract 6071005701. (OEHHA, 2022)

Exposure indicators are based on measurements of different types of pollution that people may come into contact with. Environmental effects indicators are based on the locations of toxic chemicals in or near communities. Sensitive population indicators measure the number of people in a community who may be more severely affected by pollution because of their age or health. Socioeconomic factor indicators are conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects. For the Project site's Census Tract, the highest environmental exposures (over 80%) are from ozone (O_3), DPM, lead in housing, cleanups, and hazardous waste. The highest population and socioeconomic factors (over 80%) are compromised health conditions related to asthma, low birth weight, and cardiovascular disease and a population with low levels of educational attainment and high levels of linguistic isolation and poverty. (OEHHA, 2022)

2.3.5 Geology

There are no known active or potentially active earthquake faults on the Project site or in the immediately surrounding area, and the Project site is not located within an "Alquist-Priolo" Special Studies Zone (NorCal Engineering, 2021, p. 5). Notwithstanding, and similar to other properties throughout southern California, the Project site is located within a seismically active region and is subject to ground shaking in the event of seismic activity along nearby faults.

Groundwater was not encountered in any of the test excavations on the Project site; nearby monitoring well data from approximately 0.5-mile from the Project site has recorded groundwater depths of 14 feet below ground surface (bgs) (NorCal Engineering, 2021, p. 3).

2.3.6 Soils

Two types of soils were mapped on site as part of the Project's Geotechnical Investigation (*Technical Appendix E1*). At depths up to one to two feet bgs, soils consist of fill materials described as brown, silty fine to medium grained sand with occasional gravel. The fill soils were noted to be medium dense and dry, and portions of the near-surface soils contain concrete and asphalt debris. Natural undisturbed soils occur beneath the fill soils, and are described as a brown, silty sand to sandy silt. The native soils were observed to be medium dense and damp to moist. (NorCal Engineering, 2021, p. 3)

According to mapping information available from the United States Department of Agriculture (USDA), the Project site is underlain by soils classified as "Grangeville fine sandy loam," which have a "slow" rate of runoff and a "slight" hazard for erosion (USDA, 1980, p. 14; USDA, n.d.)

2.3.7 Hydrology

The Project site is located in the Santa Ana River watershed, which drains an approximately 2,650 square-mile area and is the principal surface flow water body within the region. The Santa Ana River starts in the San Bernardino Mountains, approximately 20 miles northeast of the Project site, and flows southwesterly for approximately 96 miles across San Bernardino, Riverside, and Orange counties before spilling into the Pacific Ocean.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06071C8681J, the Project site is located within "Zone X (unshaded)," which includes "areas determined to be

outside the 0.2% annual chance floodplain." As such, the Project site is not subject to flood hazards under existing conditions. (FEMA, 2016)

Under existing conditions, the Project site generally sheet flows southwesterly. More specifically, the northeast corner of the Project site currently drains easterly, with runoff continuing south to an existing catch basin along South Sierra Way. The southeastern corner of the Project site also sheet flows easterly to South Sierra Way and discharges into the existing catch basin. The total 100-year peak flow rate to the existing catch basin on South Sierra Way is 4.7 cubic feet per second (cfs). The remaining majority of the Project site sheet flows westerly to Arrowhead Avenue, where flows continue northerly and ultimately discharge into an existing catch basin on the southeast corner of Arrowhead Avenue and Rialto Avenue. The 100-year peak flow rate to the existing catch basin within Arrowhead Avenue is 14.9 cfs. (Thienes, 2022a)

2.3.8 Utilities and Service Systems

Under existing conditions, the Project area receives domestic water service from the San Bernardino Municipal Water Department (SBMWD). Under existing conditions, there is an existing 6-inch water main within Rialto Avenue along the Project's frontage, an existing 8-inch water main along the Project's frontage with Arrowhead Avenue, and an existing 12-inch water main within Sierra Way along the Project's frontage.

Wastewater treatment services also is provided in the local area by SBMWD. Under existing conditions, there is an existing 8-inch sewer main within Rialto Avenue along the Project's frontage, an existing 14-inch sewer line along the Project's frontage with Arrowhead Avenue, and an existing 12-inch water main and an existing 8-inch sewer line within Sierra Way. All wastewater generated within the Project area is conveyed to the San Bernardino Water Reclamation Plant (SBWRP), located approximately 1.7 miles south of the Project Site.

2.3.9 Noise

To assess the existing noise level environment, 24-hour noise level measurements were taken at three locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Exhibit 5-A of the Project's Noise Impact Analysis (*Technical Appendix I*) depicts the noise level measurement locations, which include an existing residence located 104 feet north of the Project site, an existing residence located 152 feet southeast of the Project site, and an existing residence located approximately 195 feet south of the Project site. Table 2-1, *24-Hour Ambient Noise Level Measurements*, identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. The noise measurements focus on the average or equivalent sound levels (Leq). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. (Urban Crossroads, 2023e, p. 26)

Table 2-1 24-Hour Ambient Noise Level Measurements

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located north of the Project site near Meadowbrook Park Family Apartments at 120 West Rialto Avenue.	67.4	63.2
L2	Located southeast of the Project site near single-family residence at 177 South Dorothy Street.	58.9	55.0
L3	Located southeast of the Project site near single-family residence at 162 South Pershing Avenue.	58.4	56.8

1 See Exhibit 5-A of the Project's NIA (*Technical Appendix I*) for the noise level measurement locations.

2 Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 to the Project's NIA.

"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2023e, Table 5-1)

2.3.10 Vegetation

Under existing conditions, the Project site supports only one habitat type, characterized as "Disturbed" habitat with indications that annual clearing occurs throughout the property for weed control and fire fuel abatement purposes. The soils are heavily compacted and the majority of the western region is characterized as decomposed granite substrate. This vegetation community is dominated by cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), wild oat (*Avena fatua*), ripgut brome (*Bromus diandrus*), and annual sunflower (Helianthus annus). (CADRE, 2022, p. 6)

2.3.11 Wildlife

General wildlife species documented onsite or within the vicinity during the site assessment conducted by CADRE Environmental include northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), rock dove (*Columba livia*), and Botta's pocket gopher (*Thomomys bottae*). (CADRE, 2022, p. 6)

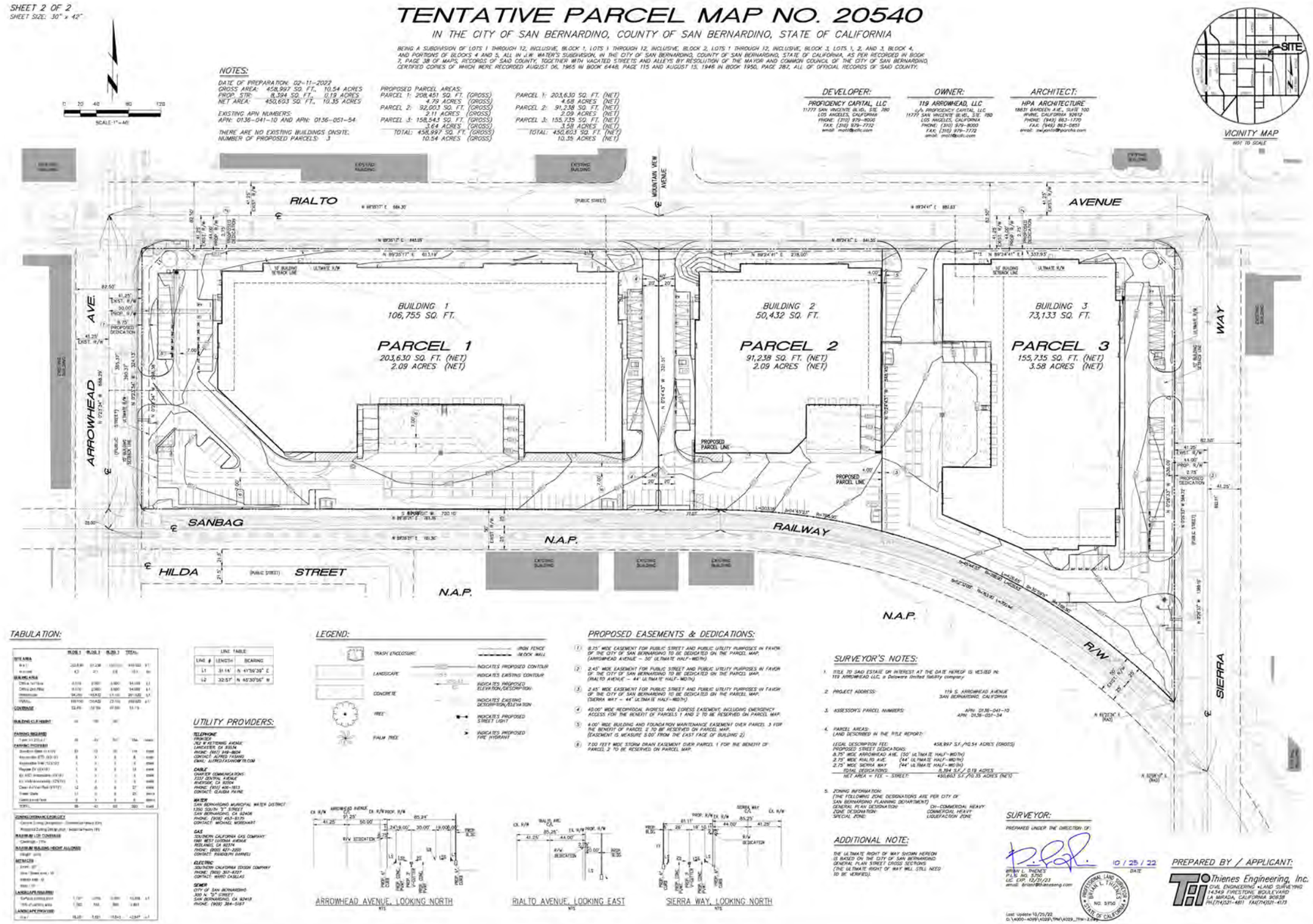
3.0 Project Description

The Project evaluated by this MND is proposed within the City of San Bernardino, San Bernardino County, California. The proposed Project consists of applications for a Subdivision (SUB22-01) and a Development Permit – D/ERC (DP-D22-04). Copies of the entitlement application for the proposed Project are herein incorporated by reference pursuant to CEQA Guidelines Section 15150 and are available for review at the City of San Bernardino Community & Economic Development Department, Planning Division, located at 201 North E Street, 3rd Floor, San Bernardino, California 92401. A detailed description of the proposed Project is provided in the following sections. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 3-4, *Matrix of Project Approvals/Permits*, at the end of this section.

3.1 PROPOSED DISCRETIONARY APPROVALS

3.1.1 Subdivision 22-01 (SUB22-01)

As shown on Figure 3-1, *Proposed Subdivision No. SUB22-01*, Subdivision No. 22-01 (SUB22-01) is proposed to reconfigure the existing parcels on the Project site to establish legal parcels for each of the three proposed buildings. Parcel 1 is proposed in the western portion of the site and would encompass proposed Building 1 on approximately 4.8 gross acres (4.7 net acres). Parcel 2 is proposed in the central portion of the site and would encompass proposed Building 2 on 2.1 gross acres (2.1 net acres). Parcel 3 is proposed in the eastern portion of the site and would encompass proposed Building 3 on 3.6 gross acres (3.6 net acres). As part of SUB22-01, a total of approximately 0.19-acre would be dedicated as roadway rights-of-way (ROW), including approximately 8.75 feet of additional ROW along the site's frontage with Arrowhead Avenue, an additional 2.75 feet of additional ROW along the site's frontage with Rialto Avenue, and an additional 2.75 feet of additional ROW along the site's frontage with Sierra Way. SUB22-01 also includes the dedication of several easements for ingress/egress, storm water, and maintenance purposes.



Source(s): Thienes Engineering, Inc. (10-25-2022)

Figure 3-1

Not to Scale

Proposed Subdivision No. SUB22-01

3.1.2 Development Permit – D/ERC No. 22-04 (DP-D22-04)

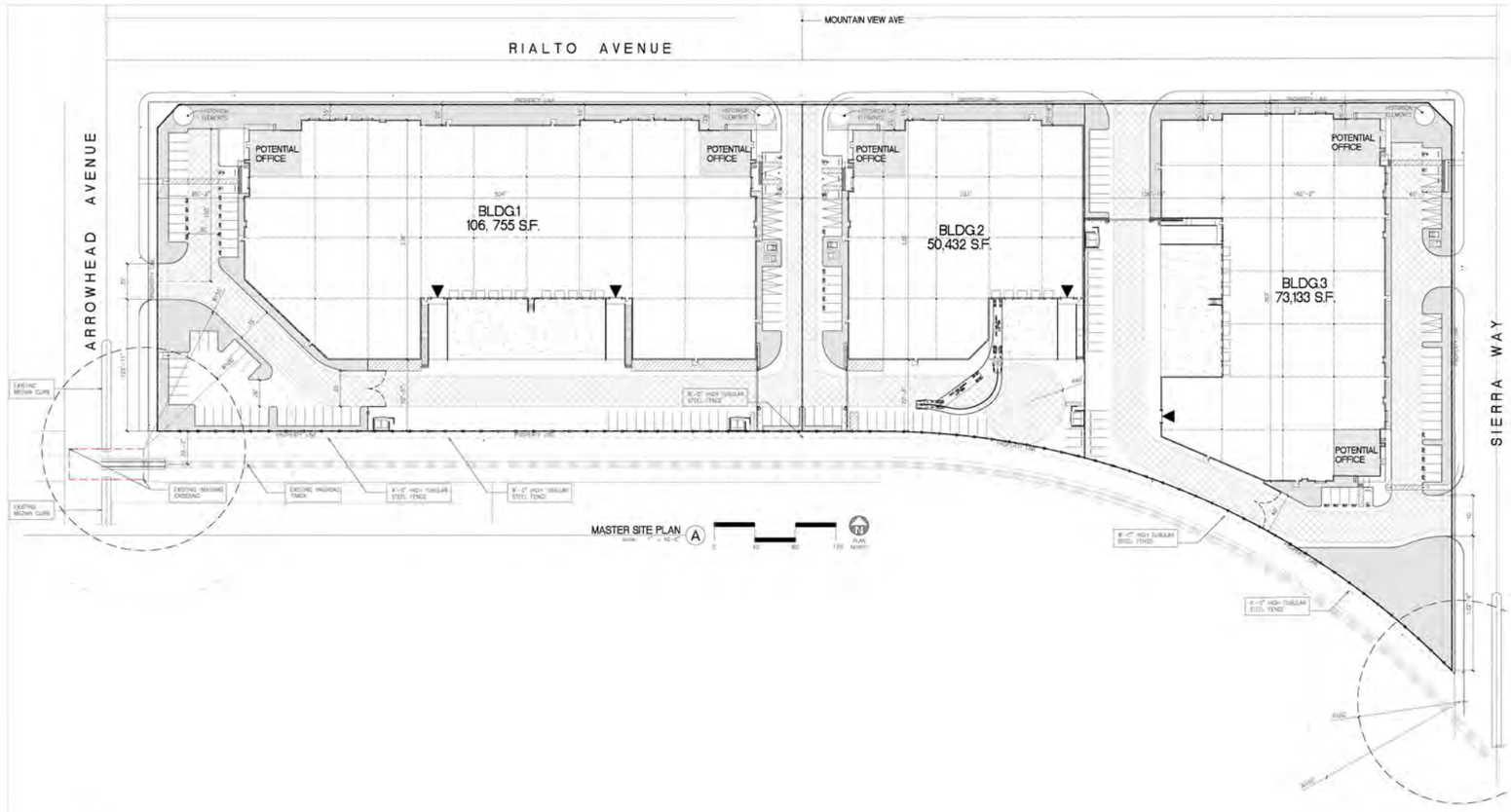
Pursuant to the City of San Bernardino Development Code, manufacturing/business park uses within the City's "CH (Commercial Heavy)" zoning classification require approval of a Development Permit, as set forth in Development Code Chapter 19.44 (Administrative and Development Permits). Accordingly, Development Permit – D/ERC No. 22-04 (DP-D22-04) is proposed to allow for the future construction and operation of three non-refrigerated manufacturing/business park buildings on the 10.4 net-acre Project site. Provided below is a description of the key components of DP-D22-04.

A. Site Planning and Building Configuration

Figure 3-2, *Conceptual Site Plan*, depicts the overall site plan proposed as part of the Project. As shown, the Project Applicant proposes to develop the 10.4 net-acre site with three non-refrigerated manufacturing/ business park buildings (herein referred to as Buildings 1, 2, and 3). Building 1, proposed in the western portion of the site, would contain approximately 106,755 s.f. of building area. Building 2, proposed in the central portions of the site, would contain approximately 50,432 s.f. of building area. Building 3, proposed in the eastern portions of the site, would contain approximately 73,133 s.f. of building area.

More specifically, Building 1 is proposed in the western 4.7 net acres of the Project site, at the southeastern corner of Rialto Avenue and Arrowhead Avenue. Building 1 would contain approximately 106,755 s.f. of building area, including two stories of office uses comprising 12,000 s.f. and 94,755 s.f. of ground floor manufacturing/business park space. The primary entrances for Building 1 are proposed at the northwest and northeast corners of the building. Building 1 would include a total of 11 dock doors within a truck court proposed along the southern side of the building. Access to the truck docking area would be controlled by proposed 8-foot-tall metal gates at the western and eastern edges of the truck court. A total of 82 parking spaces for passenger vehicles and vans is accommodated throughout the site, along with 11 truck trailer stalls and two grade level doors. A minimum 30-foot-wide fire lane also is proposed around the western, southern, and eastern sides of the building. As shown on Figure 3-3, *Site Access Driveways*, access to the Building 1 site primarily would be accommodated via a driveway along Arrowhead Avenue (Driveway 1) and a shared driveway access along Rialto Avenue (Driveway 2). Driveways 1 and 2 would allow for full access for passenger cars and trucks. All of the proposed driveways would be stop controlled for traffic exiting the Project site, and would allow for full turn movements onto Arrowhead Avenue and Rialto Avenue.

Building 2 is proposed in the central 2.1 net acres of the Project site. Building 2 would contain approximately 50,432 s.f. of building area, including two stories of office uses comprising a total of 5,000 s.f. and 45,432 s.f. of ground floor manufacturing/business park space. The primary entrance into Building 2 would be accommodated at the northwest corner of the building. Building 2 would include a total of 5 dock doors in a truck court located along the southern side of the building. Access to the truck docking area would be controlled by proposed 8-foot-tall metal gates at the western and eastern edges of the truck court. A total of 34 parking spaces for passenger vehicles and vans are accommodated throughout the site, along with five truck trailer stalls and a grade level door. A minimum 30-foot-wide fire lane also is proposed along the western and southern sides of the building, with an additional 30-foot-wide fire lane accommodated to the west of Building 3 (which also would serve Building 2). As shown on Figure 3-3, access to the Building 2 site primarily would be accommodated via two driveways along Rialto Avenue (Driveways 2 and 3), both of which would provide access for passenger vehicles and trucks. Both of the proposed driveways would be stop controlled for traffic exiting the Project site, and would allow for full turn movements onto Rialto Avenue.



TABULATION

	BLDG. 1	BLDG. 2	BLDG. 3	TOTAL	
SITE AREA					
In s.f.	203,630	91,238	155,735	450,603	s.f.
In acres	4.7	2.1	3.6	10.3	ac.
BUILING AREA					
Office 1st Floor	6,000	2,500	6,000	14,500	s.f.
Office 2nd Floor	6,000	2,500	6,000	14,500	s.f.
Warehouse	94,755	45,432	61,133	201,320	s.f.
TOTAL	106,755	50,432	73,133	230,320	s.f.
COVERAGE	52.4%	55.3%	47.0%	51.1%	
BUILDING CLR HEIGHT	32'	30'	30'		
PARKING REQUIRED					
1 per 1/1,250 s.f.	85	40	59	184	stalls
PARKING PROVIDED					
Standard Stalls (9'x19')	57	22	35	114	stalls
Accessible STD. (9'X19')	3	1	2	6	stalls
Accessible Van (12'X19')	1	1	1	3	stalls
Regular EV (9'X19')	7	2	5	14	stalls
EV STD. Accessible (9'X19')	1	1	1	3	stalls
EV VAN Accessible (12'X19')	1	1	1	3	stalls
Clean Air/Van Pool (9'X19')	12	6	9	27	stalls
Trailer Stalls	11	5	9	25	doors
Grade Level Door	2	1	2	5	doors
TOTAL	95	40	65	200	stalls

ZONING ORDINANCE FOR CITY					
Current Zoning Designation - Commercial Heavy (CH)					
Proposed Zoning Designation - Industrial Heavy (IH)					
MAXIMUM LOT COVERAGE					
Coverage - 75%					
MAXIMUM BUILDING HEIGHT ALLOWED					
Height - none					
SETBACKS					
Front - 20'					
Side / Street side - 10'					
Interior side - 0'					
Rear - 10'					
LANDSCAPE REQUIRED					
Surface parking area	9,747	3,762	5,985	19,494	s.f.
15% of parking area	1,462	564	898	2,924	
LANDSCAPE PROVIDED					
In s.f.	18,281	8,521	17,045	43,847	s.f.

SITE PLAN GENERAL NOTES

1. ALL CONSTRUC SHALL CONFORM WITH MUNICIPAL STANDARDS.
2. BID CIVIL AND STRUCTURAL FOR SITE CONSISTS.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. REFER TO CIVIL PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS FOR EFFECT 45.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. REFER TO CIVIL GRADE FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. REFER TO CIVIL DRAWINGS.
8. CONTRACTOR TO REFER TO CIVIL DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. REFER TO CIVIL DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA WAY. EXPANSION JOINTS TO HAVE COMPRESSING EXPANSION FILLER MATERIAL OF 1/4" [illegible] TO BE A MINIMUM SMOOTH FINISH U.N.O.
11. ALL SIGNAGE SHALL CONFORM WITH THE MUNICIPAL STANDARDS.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM BY FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. SITE PLAN SHALL MEET ALL ENGINEERING AND APWES REQUIREMENT.
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
19. LANDSCAPED AREAS SHALL BE CURBED WITH A MINIMUM SIX INCHES (6") HIGH CURB.

SITE PLAN GENERAL NOTES

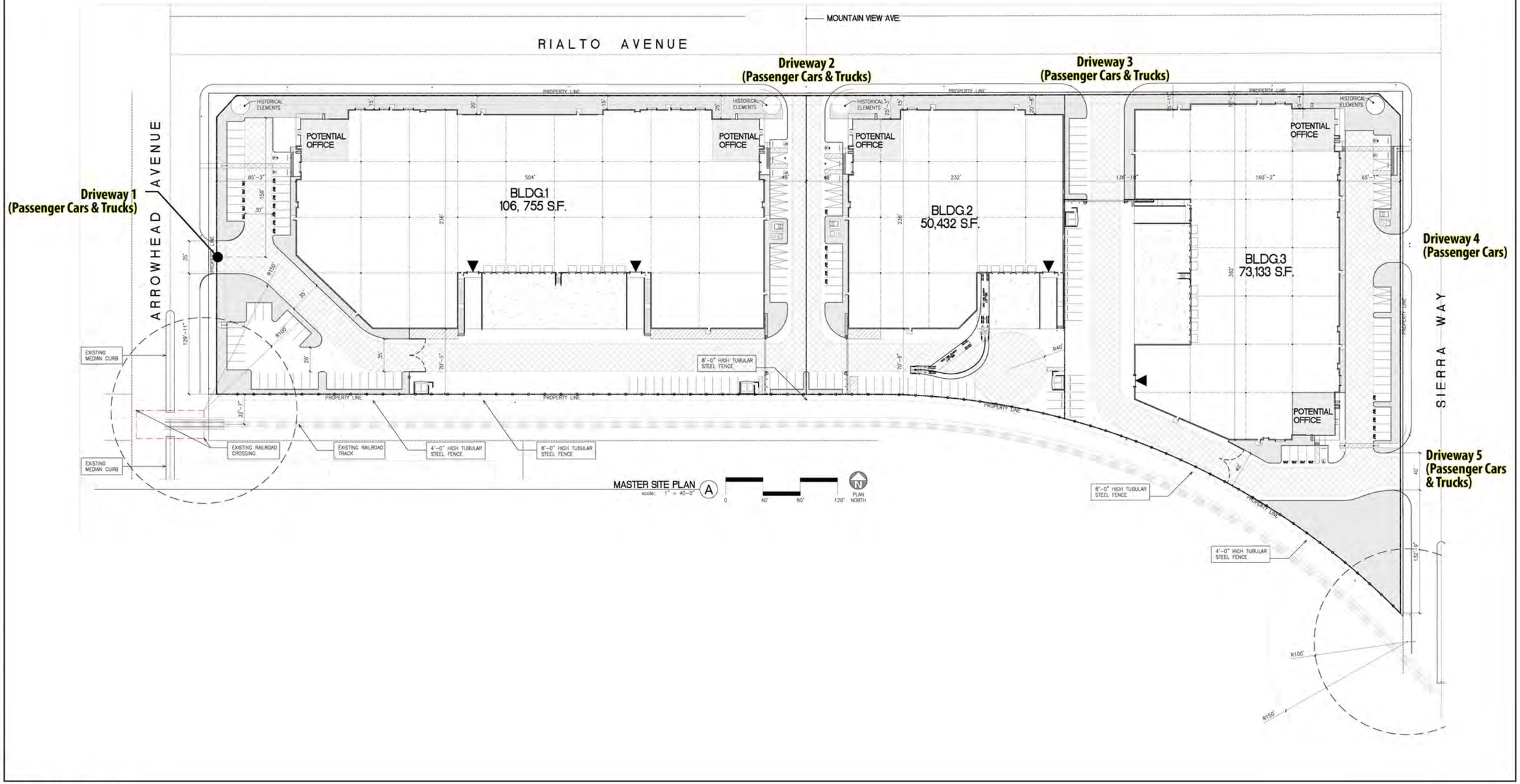
CONCRETE PAVING — SEE PLAN
DRAINAGE THERMOPLEX
HYBRID PARKING STALL
9'-0" X 19'
ACCESSIBLE PARKING STALL
9' X 19' + 5' W ACCESSIBLE AISLE
VAN ACCESSIBLE
19' X 19' + 5' W ACCESSIBLE AISLE
FUTURE EV CHARGING STATION
9'-0" X 19'
CLEAN AIR
VAN/POOL/EV
LIGHT STANDARD
20' WIDE FIRE LANE
PAINTED RED CURB AND STRIPE
NO PARKING, LIGHT REQUIREMENT
EXISTING PUBLIC
FIRE HYDRANT
PRIVATE FIRE HYDRANTS
APPROXIMATE LOCATION

Source(s): HPA (01-05-2023)

Figure 3-2

Not to Scale

Conceptual Site Plan



Source(s): HPA (09-15-2022)

Figure 3-3

Not to Scale

Site Access Driveways

Building 3 is proposed in the eastern 3.6 net acres of the Project site, at the southwest corner of Rialto Avenue and Sierra Way. Building 3 would contain approximately 73,133 s.f. of building area, including two stories of office uses comprising 12,000 s.f. and 61,133 s.f. of manufacturing/business park space. The primary entrances for Building 3 are proposed at the northeast and southeast corners of the building. Building 3 would include a total of 9 dock doors within a truck court proposed along the western side of the building. Access to the truck docking area would be controlled by proposed 8-foot-tall metal gates along the western boundary of the Building 3 site and to the south of the building. A total of 54 parking spaces for passenger vehicles and vans is accommodated throughout the site, along with 9 truck trailer stalls and two grade level doors. A minimum 30-foot-wide fire lane also is proposed around the western, southern, and eastern sides of the building. As shown on Figure 3-3, access to the Building 3 site would be accommodated by one driveway along Rialto Avenue (Driveway 3) and two driveways along Sierra Way (Driveways 4 and 5). Driveway 3 and the southern driveway along Sierra Way (Driveway 5) would provide access for both passenger cars and trucks, while the northern driveway along Sierra Way (Driveway 4) would provide access for passenger cars, only. All of the proposed driveways would be stop controlled for traffic exiting the Project site, and would allow for full turn movements onto Rialto Avenue and Sierra Way.

B. Grading and Site Work

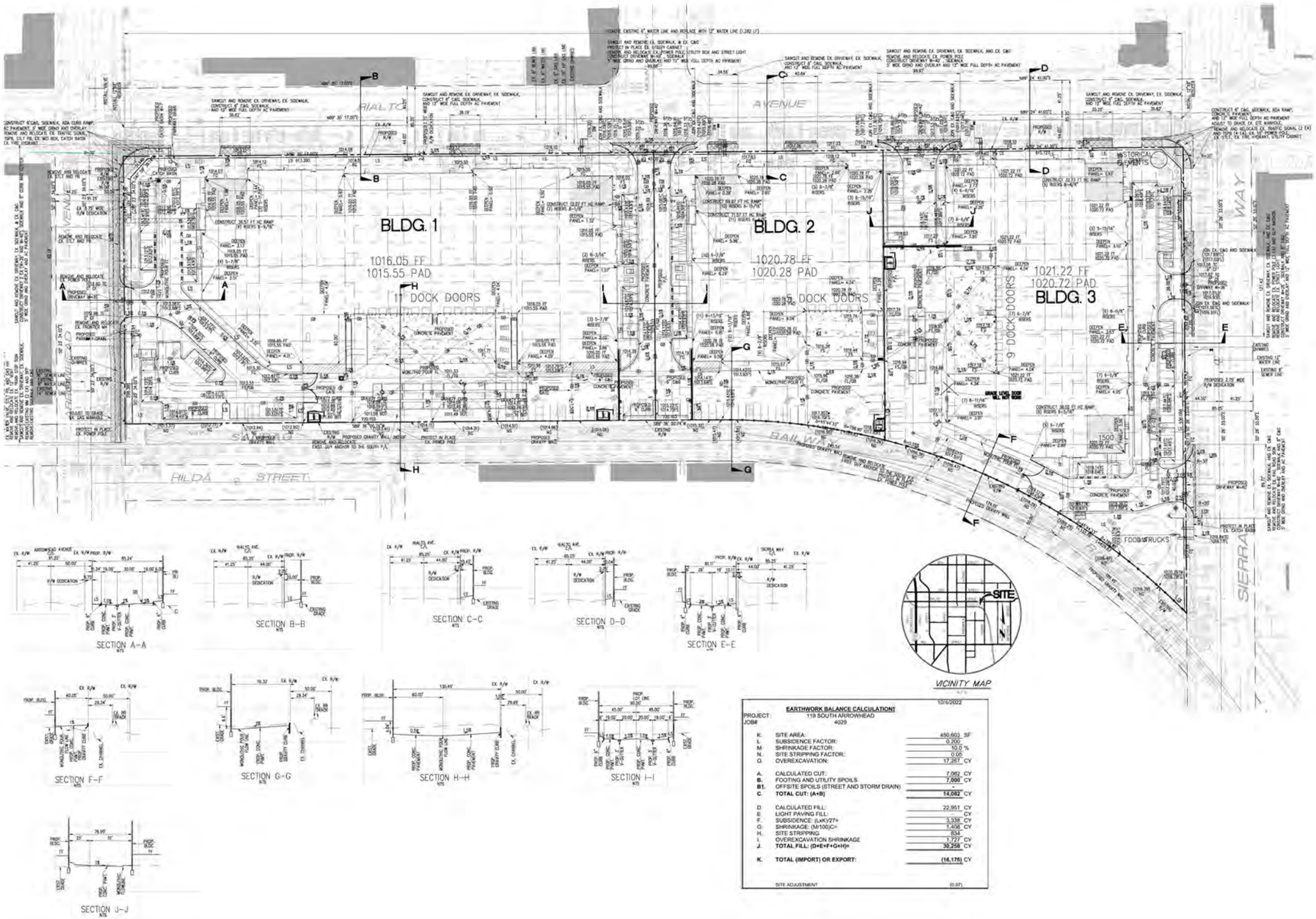
Figure 3-4, *Conceptual Grading Plan*, depicts the Project's proposed grading plan. As shown, the site would be graded in a manner that largely approximates the site's existing topographic conditions. Grading associated with the Project would require a total of 14,082 cubic yards (cy) of cut and 30,258 cy of fill. Due to existing contaminated soils on site, grading activities associated with the Project would require a total import of 18,250 cy of soil material, while approximately 2,500 cy of existing contaminated soils on site would need to be exported to a facility located in the City of Sunshine, Arizona. All portions of the Project site would be subject to disturbance associated with proposed grading activities. No large slopes or retaining walls are proposed as part of the Project's grading plan.

C. Circulation

As previously depicted on Figure 3-3, access to the Project site would be provided via one driveway along Arrowhead Avenue (Driveway 1), two driveways along Rialto Avenue (Driveways 2 and 3), and two driveways along Sierra Way (Driveways 4 and 5). Driveways 1, 2, 3, and 5 would afford access for passenger cars and trucks, while Driveway 4 would afford access for passenger cars, only. All of the proposed driveways would be stop controlled for traffic exiting the Project site, and would allow for full turn movements onto adjacent roadways.

D. Architectural Design

Conceptual building elevations for Building 1 are shown on Figure 3-5, *Building 1 Conceptual Elevations*. As shown, Building 1 would have a variable roof line that measures between 32 feet in height at the office spaces at the northeast and northwest corners of the building to a maximum height of 44.67 feet along the northern side of the building. The northeast and northwest corners of the building would be treated with blue reflective glazing, wood siding, orange and grey accent columns, black anodized mullions, metal awnings, and tenant signage. The remaining portions of the façade, except for the truck court, would include a combination of light and grey concrete panels accented by blue reflective glazing, wood siding, and orange accent painting. The building façade



10/4/2022

EARTHWORK BALANCE CALCULATIONS

PROJECT: 119 SOUTH ARROWHEAD
JOB# 4029

K.	SITE AREA:	450,603	SF
L.	SUBSIDENCE FACTOR:	0.200	
M.	SHRINKAGE FACTOR:	10.0	%
N.	SITE STRIPPING FACTOR::	0.05	
O.	OVEREXCAVATION:	17,287	CY
A.	CALCULATED CUT:	7,082	CY
B.	FOOTING AND UTILITY SPOILS	7,000	CY
B1.	OFFSITE SPOILS (STREET AND STORM DRAIN)		CY
C.	**TOTAL CUT: (A+B)**	14,082	CY
D.	CALCULATED FILL:	22,951	CY
E.	LIGHT PAVING FILL:		CY
F.	SUBSIDENCE: (L+K)/27=	3,338	CY
G.	SHRINKAGE: (M/100)C=	1,408	CY
H.	SITE STRIPPING	834	
I.	OVEREXCAVATION SHRINKAGE	1,727	CY
J.	**TOTAL FILL: (D+E+F+G+H)=**	30,258	CY
K.	**TOTAL (IMPORT) OR EXPORT:**	(16,176)	CY
	SITE ADJUSTMENT	(0.07)	

Source(s): Thienes Engineering, Inc. (10-14-2022)

Figure 3-4

Not to Scale

Conceptual Grading Plan

Building One - W. Rialto Avenue Elevation - North Elevation

Building One - West Elevation

Building One - South Elevation

Building One - Sierra Way - East Elevation

Source(s): HPA (10-13-2022)

Figure 3-5

Not to Scale

Building 1 Conceptual Elevations

along the truck court would consist of concrete tilt-up panels painted in light grey, along with 11 overhead truck docking doors, two large 12-foot by 14-foot overhead metal roll up doors along either side of the docking doors, and two metal doors.

Conceptual building elevations for Building 2 are shown on Figure 3-6, *Building 2 Conceptual Elevations*. As shown, the architectural features associated with Building 2 would be similar to Building 1. Building 2 would have a variable roof line that measures between 32 feet in height at the office space to a maximum height of 45.67 feet. The northwest corner of the building would be treated with blue reflective glazing, wood siding, orange and grey accent columns, black anodized mullions, metal awnings, and tenant signage. The remaining portions of the façade, except for the truck court, would include a combination of light and grey concrete panels accented by blue reflective glazing, wood siding, and orange accent painting. The building façade along the truck court would consist of concrete tilt-up panels painted in light grey, along with five overhead truck docking doors, one large metal roll up door to the east of the docking doors, and one metal door.

Conceptual building elevations for Building 3 are shown on Figure 3-7, *Building 3 Conceptual Elevations*. As shown, the architectural features associated with Building 3 would be similar to Buildings 1 and 2. Building 3 would have a variable roof line that measures between 32 feet in height at the office spaces at the northeast and southeast corners of the building to a maximum height of 45.67 feet along the remaining portions of the building. The northeast and southeast corners of the building would be treated with blue reflective glazing, wood siding, orange and grey accent columns, black anodized mullions, metal awnings, and tenant signage. The remaining portions of the façade, except for the truck court, would include a combination of light and grey concrete panels accented by blue reflective glazing, wood siding, and orange accent painting. The building façade along the truck court would consist of concrete tilt-up panels painted in light grey, along with nine overhead truck docking doors, two large metal roll up doors to the north and south of the docking doors, and two metal doors.

E. Landscaping

Figure 3-8, *Conceptual Landscape Plan*, depicts the conceptual land use plan proposed as part of DP-D22-04. As shown, landscaping on site would include a combination of trees, shrubs, and groundcover. Landscaping is proposed along the site's frontages with abutting roadways, within the passenger vehicle parking areas, and around the proposed buildings. Tree species proposed as part of the conceptual landscape plan include 48-inch box blue Palo Verde (*Cercidium* 'Desert Museum'), 15-gallon desert willow (*Chilopsis linearis*), chitalpa (*Chitalpa tashkentensis*), 15-gallon Afghan pine (*Pinus eldarica*), 24-inch box Chinese pistache (*Pistacia chinensis*), 24- and 48-inch box Chilean mesquite (*Prosopis chilensis*), 36-inch box African sumac (*Rhus lancea*), and 15-gallon Brisbane box (*Tristania conferta*).

F. Walls and Fencing

As previously depicted on Figure 3-2, walls and fencing on site would be limited to 8-foot-tall metal gates at the entrances to the truck courts for each building, as well as 8-foot-tall black painted metal tubular fencing along the Project site's southern boundary, along the existing railroad tracks.

G. Water, Sewer, and Drainage

Proposed water, sewer and storm drain improvements are depicted on Figure 3-9, *Conceptual Utility Plan*. A description of the water, sewer, and storm drain improvements proposed as part of the Project is provided below.

Building Two - W. Rialto Avenue Elevation - North Elevation

Building Two - West Elevation

Building Two - South Elevation

Building Two - Sierra Way - East Elevation

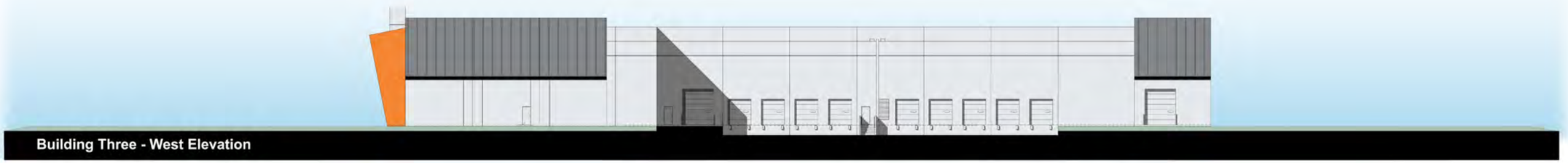
Source(s): HPA (10-13-2022)

Figure 3-6

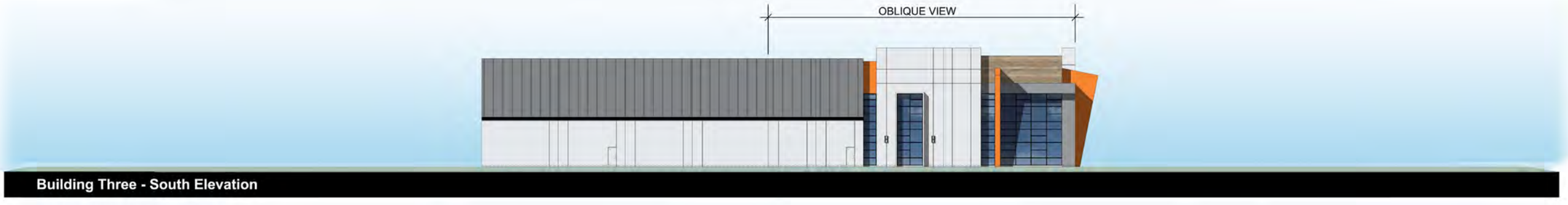
Not to Scale

Building 2 Conceptual Elevations

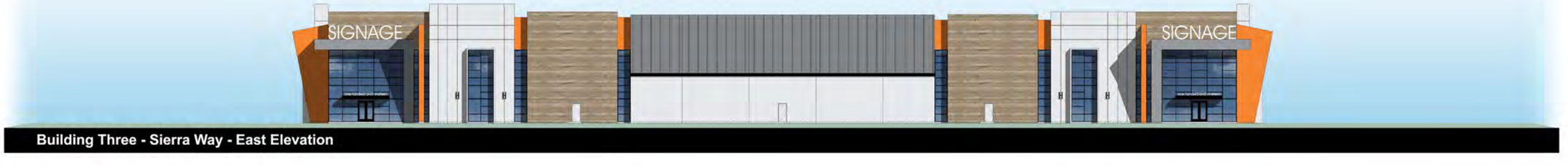
Building Three - W. Rialto Avenue Elevation - North Elevation



Building Three - West Elevation



Building Three - South Elevation



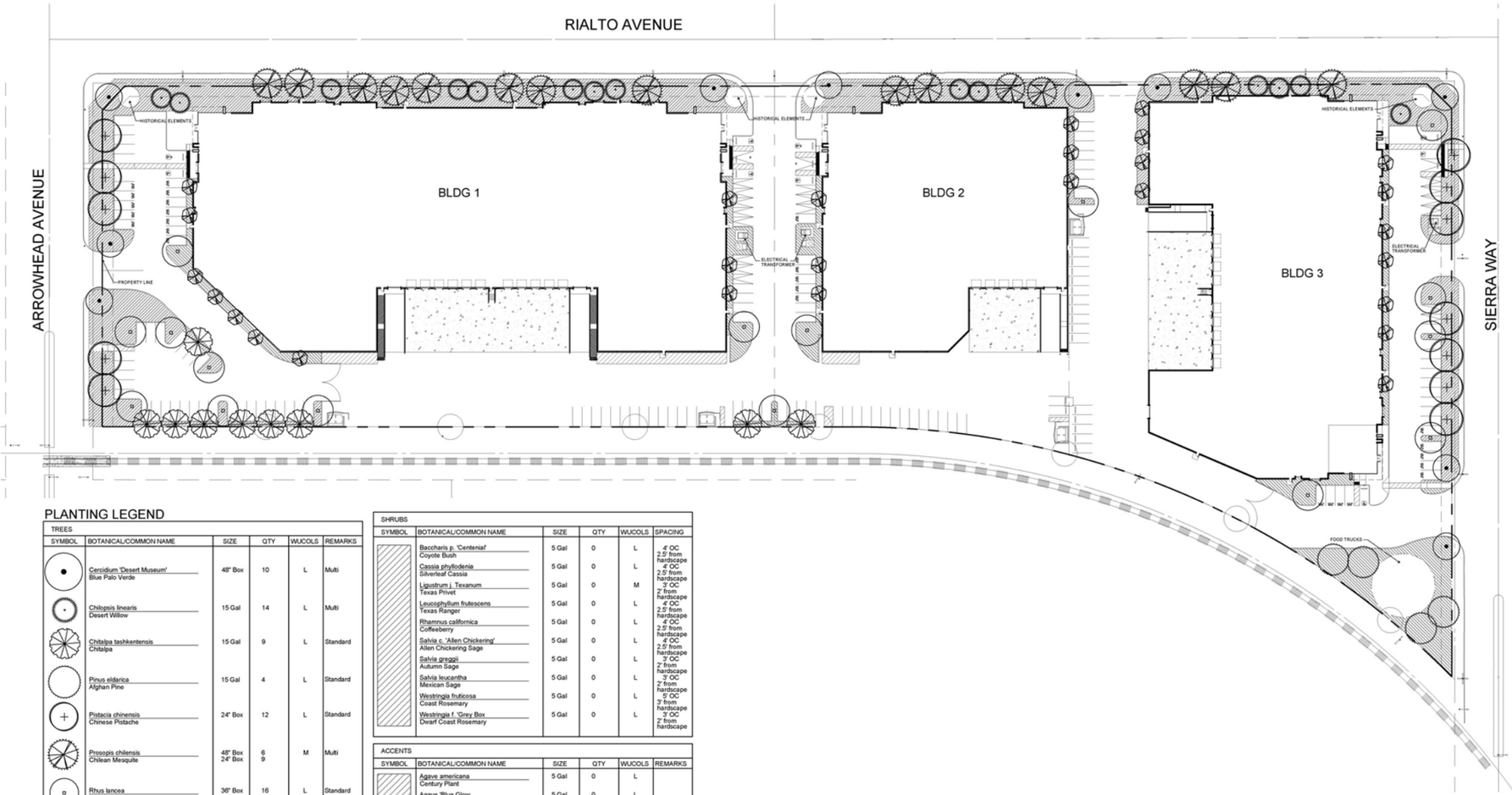
Building Three - Sierra Way - East Elevation

Source(s): HPA (10-13-2022)

Figure 3-7

Not to Scale

Building 3 Conceptual Elevations



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	48" Box	10	L	Multi
	Chilopsis linearis Desert Willow	15 Gal	14	L	Multi
	Chitalpa tashkentensis Chitalpa	15 Gal	9	L	Standard
	Pinus eldarica Afghan Pine	15 Gal	4	L	Standard
	Pistacia chinensis Chinese Pistache	24" Box	12	L	Standard
	Prosopis chilensis Chilean Mesquite	48" Box 24" Box	6 9	M	Multi
	Rhus lancea African Sumac	36" Box	16	L	Standard
	Tristania conferta Brisbane Box	15 Gal	27	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	SPACING
	Baccharis p. 'Centenial' Coyote Bush	5 Gal	0	L	4' OC 2.5' from hardscape
	Cassia phyllodenia Silverleaf Cassia	5 Gal	0	L	4' OC 2.5' from hardscape
	Ligustrum j. Texanum Texas Privet	5 Gal	0	M	3' OC 2' from hardscape
	Leucophyllum frutescens Texas Ranger	5 Gal	0	L	4' OC 2.5' from hardscape
	Rhamnus californica Coffeeberry	5 Gal	0	L	4' OC 2.5' from hardscape
	Salvia c. 'Allen Chickering' Allen Chickering Sage	5 Gal	0	L	4' OC 2.5' from hardscape
	Salvia greggii Autumn Sage	5 Gal	0	L	3' OC 2' from hardscape
	Salvia leucantha Mexican Sage	5 Gal	0	L	3' OC 2' from hardscape
	Westringia fruticosa Coast Rosemary	5 Gal	0	L	5' OC 3' from hardscape
	Westringia f. 'Grey Box Dwarf Coast Rosemary	5 Gal	0	L	3' OC 2' from hardscape

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave americana Century Plant	5 Gal	0	L	
	Agave 'Blue Glow Blue Glow Agave	5 Gal	0	L	
	Agave desmeniana Smooth Agave	5 Gal	0	L	
	Aloe maculata Soap Aloe	5 Gal	0	L	
	Dasylerion wheeleri Desert Spoon	5 Gal	0	L	
	Hesperaloe parviflora Red Yucca	5 Gal	0	L	

GROUNDCOVER

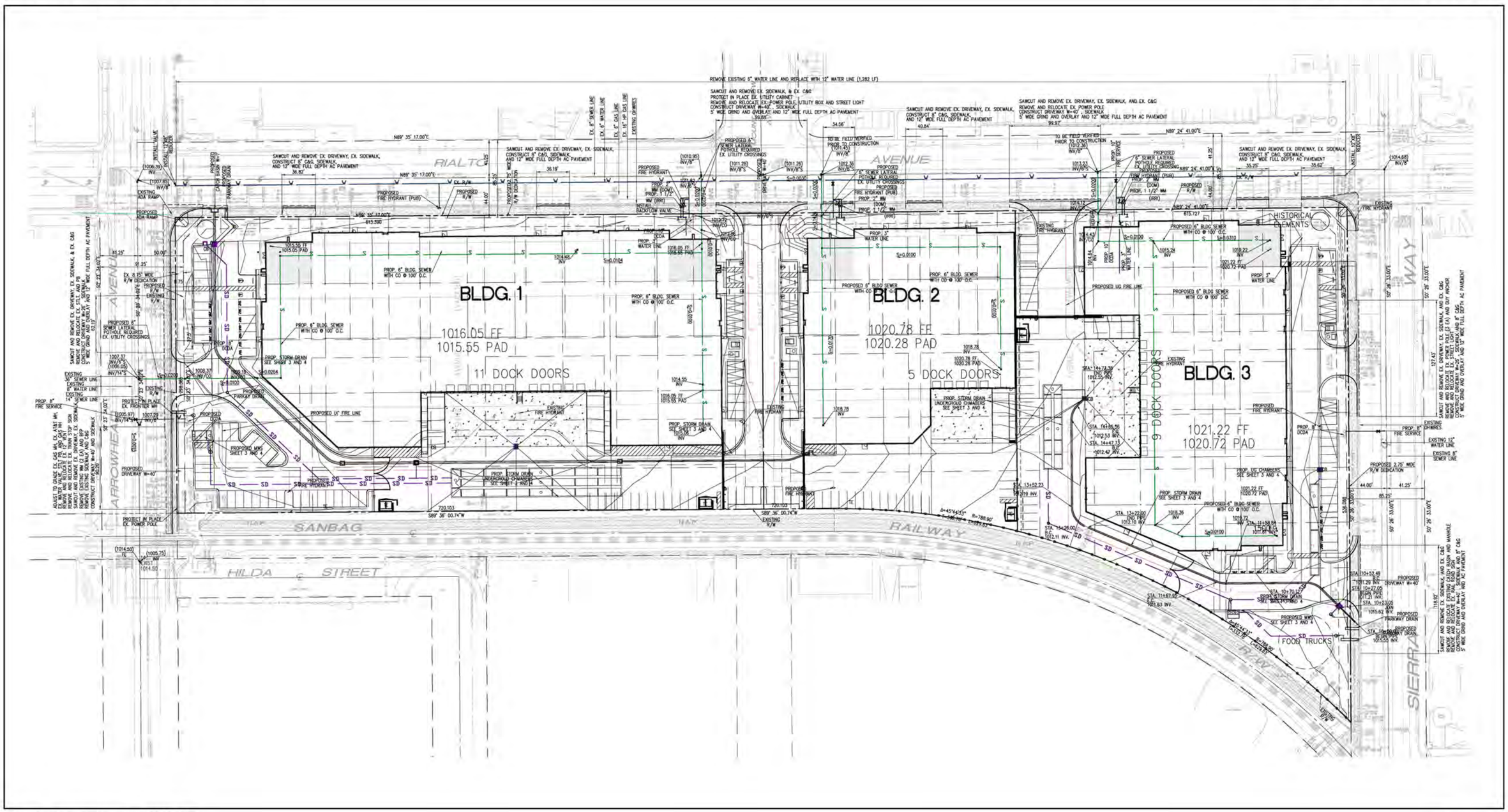
SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	8' O.C.	L	
	Baccharis p. 'Pigeon Point' Dwarf Coyote Bush	1 Gal	6' O.C.	L	
	Myoporum parvifolium Myoporum	1 Gal	36" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	

Source(s): Hunter Landscape (10-26-2022)

Figure 3-8

Not to Scale

Conceptual Landscape Plan



Source(s): Thienes Engineering, Inc. (10-14-2022)

Figure 3-9

Not to Scale

Conceptual Utility Plan

2. Water Service

Water service to the proposed Project would be provided by SBMWD. As shown on Figure 3-9, water service for the three proposed buildings would be accommodated by an existing 6-inch water main within Rialto Avenue. A lateral would be constructed from the existing water line, which would connect to proposed two- and three-inch potable water lines and a 1.5-inch irrigation line. The proposed lateral line, along with the existing 8-inch water line within Arrowhead Avenue and the existing 12-inch water main within Sierra Way, also would provide water supply to fire hydrants proposed along or adjacent to these three roadways.

3. Sewer Service

Sewer service to the Project site also would be provided by SBMWD. As shown on Figure 3-9, sewer service for Building 1 would be accommodated by six-inch on-site sewer lines that would connect to an existing eight-inch sewer line within Rialto Avenue and an existing 14-inch sewer line within Arrowhead Avenue. Sewer service for Buildings 2 and 3 would be accommodated via proposed on-site six-inch sewer lines, both of which would connect to an existing eight-inch sewer line within Rialto Avenue. All wastewater generated by the proposed Project would be conveyed to the SBWRP for treatment, which is located approximately 1.7 miles south of the Project Site.

4. Drainage and Water Quality

As shown on Figure 3-9, development of the Project site as proposed would establish three separate Drainage Management Areas (DMA 1A, DMA 2A, and DMA 2B). DMA 1A encompasses a majority of the western portions of the Project site, between the eastern façade of Building 2 and the western Project boundary. Within DMA 1A, runoff from the vehicle parking lot to the westerly side of Building 1 would drain to a catch basin in the northwesterly corner of the site, while runoff from Building 1 would be captured by catch basins in the southerly truck yard of Building 1. Runoff from Building 2 and the drive aisle/parking between Buildings 1 and 2 would drain to a proposed catch basin at the southwesterly corner of Building 2. The Design Capture Volume (DCV) would be diverted to a proposed underground solid 96-inch Corrugated Metal Pipe (CMP) system and filtered through a Modular Wetlands System (MWS) to provide water quality treatment prior to discharge from the Project site. Runoff generally would be conveyed westerly, then northerly to be discharged to the back of a proposed/relocated catch basin in Rialto Avenue. (Thienes, 2022b, p. 1-1)

DMA 2A generally encompasses the eastern portion of Building 3 and the drive aisle and parking areas to the east of Building 3. Runoff from the eastern portion of Building 3 would drain to a catch basin in the vehicle parking area near the southeastern corner of Building 3. The DCV would be diverted to a proposed underground solid 96-inch CMP system and filtered through a MWS to provide water quality treatment prior to discharge from the Project site. Runoff generally would be conveyed southerly then easterly and would discharge to Sierra Avenue. (Thienes, 2022b, p. 1-1)

DMA 2B generally encompasses most of Building 3 and the drive aisle/parking areas to the west of Building 3. Runoff from the easterly portion of Building 3 would drain to a catch basin in the vehicle parking area. The DCV would be diverted to a proposed underground solid 96-inch CMP system and filtered through a MWS to provide water quality treatment prior to discharge from the Project site. Runoff generally would be conveyed southerly then easterly to discharge to Sierra Avenue. (Thienes, 2022b, p. 1-1)

Approximately 0.50-acre of self-treating landscape areas along the northerly property line and 0.25-acre of self-treating landscape in the southwesterly corner of the site would drain offsite (totaling to 0.75-acre). The landscaped areas are considered self-treating areas and will not be routed to the proposed Low Impact Development (LID) Best Management Practices (BMPs). (Thienes, 2022b, p. 1-1)

3.2 SCOPE OF ENVIRONMENTAL ANALYSIS

3.2.1 Construction Characteristics

Project construction would begin with site preparation, then mass-grading and installation of underground infrastructure. As part of mass grading activities, a total of 18,250 cy of imported soil material would be required, while approximately 2,500 cy of existing contaminated soils on site would need to be exported to a facility located in the City of Sunshine, Arizona. Next, fine grading would occur, surface materials would be poured, and the proposed buildings would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed. For purposes of analysis, construction was expected to commence in April 2023 and conclude in March 2024. Although the Project's construction activities would commence later than the dates used in the analysis, construction activities that occur later than the analyzed dates s would result in reduced air quality and greenhouse gas (GHG) emissions because emission factors for construction equipment decrease as time passes and the analysis year increases due to emission regulations becoming more stringent over time and older pieces of construction equipment being replaced with newer, cleaner emission equipment. Thus, the construction schedule used in this IS/MND presents a worst-case analysis of the Project's potential impacts to the environment, and the activity and associated equipment represent a reasonable approximation of the expected construction fleet as required per CEQA Guidelines

Table 3-1 Construction Phase Duration

Construction Activity	Days
Site Preparation	10
Grading	21
Building Construction	199
Paving	24
Architectural Coating	45

(Urban Crossroads, 2023a, Table 3-3)

Construction workers would travel to the site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction equipment is expected to operate on the Project site up to eight hours per day, six days per week. Even though construction activities are permitted to occur between 7:00 a.m. to 8:00 p.m. pursuant to City of San Bernardino Municipal Code Section 8.54.070, as is typical to a construction site, construction equipment is not in continual use and some pieces of equipment are used only periodically throughout a typical day of construction. Thus, eight hours of daily use per piece of equipment is a reasonable assumption. The types and numbers of heavy equipment expected to be used during construction activities are listed in Table 3-2, *Construction Equipment Assumptions*.

Table 3-2 Construction Equipment Assumptions

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

[1] In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.
(Urban Crossroads, 2023a, Table 3-4)

3.2.2 Operational Characteristics

At this time, the future occupants of the Project are unknown. The Project Applicant expects that the proposed buildings would be used for assembling and processing purposes to serve the local market. The Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Exterior lighting would be subject to compliance with the City of San Bernardino Municipal Code, which requires exterior lighting to be shielded and directed downward and away from adjoining properties.

The buildings are designed such that business operations would be conducted within the enclosed building, with the exception of vehicle movement, parking, and the loading and unloading of tractor trailers at designated loading bays. Building 1 is designed to have 11 loading bays on the south side of the building, Building 2 is designed to have five loading bays on the southern side of the building, and Building 3 is designed to have nine loading bays along the western side of the building. As a practical matter, dock doors on manufacturing/business park buildings are not occupied by a truck at all times of the day. There are typically more dock positions on manufacturing/business park buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the manufacturing/business park building. As a result, many dock positions are frequently inactive throughout the day. The outdoor cargo handling equipment used during loading and unloading of trailers is expected to be powered by non-diesel equipment, which could be natural gas or electric.

The Project is calculated to generate 538 passenger vehicle trips and 132 truck trips per day (actual vehicles) during Project operations (Urban Crossroads, 2023, Table 4-2). Pursuant to State law, on-road diesel-fueled trucks that access the Project site are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

Development of the Project as proposed would result in approximately 95% of the site (9.9 net acres) containing impervious surfaces, with the remaining approximately 5% (0.5 net acre) consisting of pervious landscaped areas (Thienes, 2022b, pp. 4-7 to 4-8). According to rates utilized by the SBMWD, manufacturing/business park buildings generate a demand for one acre-foot per year (AFY) per 7,500 s.f. of building area, while landscaping generates a demand for 2.0 AFY per acre. Accordingly, the Project is anticipated to result in a calculated water demand for 32.7 AFY ([230,320 s.f. x 1.0 AFY/7,500 s.f.] + [1.0-acre x 2.0 AFY/acre] = 32.7 AFY), or approximately 29,201 gallons per day (gpd). For purposes of analysis in this MND, the proposed Project conservatively is estimated to generate 27,415 gallons of wastewater (sewer flow) per day, which is the same as the anticipated water demand for the three proposed buildings; however, it should be noted that the Project's total wastewater generation would be less than the Project's water demand, as a portion of the Project's water demand would not be conveyed to the Project's proposed sewer lines. (SBMWD, 2020c, Table 2)

According to the Project's energy analysis, the Project would result in an annual demand for 1,116,304 kilowatt hours per year (kWh/year) of electricity and approximately 292,847 gallons per year of vehicular-related fuel consumption. Based on information provided by the Project Applicant, the proposed buildings would not utilize natural gas. (Urban Crossroads, 2023c, p. 37, Table 4-9, and Table 4-10) The Project would be required by law to comply with enhanced building/utilities energy efficiencies mandated under California building codes (e.g., California Energy Code and California Green Building Code).

Because the user(s) of the Project's three buildings are not yet known, the number of jobs that the proposed Project would generate cannot be precisely determined; therefore, for purposes of analysis, employment estimates were calculated using a publication from the Southern California Association of Governments (SCAG), entitled, "Employment Density Study," and dated October 2001. Per Table II-B of this publication, manufacturing and business/industrial park uses generate approximately 1 employee per 705 s.f. Based on these factors, and as shown in Table 3-3, *Employment Estimates*, the Project is anticipated to generate approximately 327 new, recurring jobs. (SCAG, 2001, Table II-B)

Table 3-3 Employment Estimates

Land Use	Building Area	SCAG Conversion Factor	Estimated Employees
Manufacturing/Business Park	230,320 s.f.	1 employee per 705 s.f.	327

(SCAG, 2001, Table II-B)

3.2.3 Summary of Requested Actions

The City of San Bernardino has primary approval responsibility for the proposed Project. As such, the City is the Lead Agency for this MND pursuant to CEQA Guidelines Section 15050. The City will consider the information contained in this MND and this MND's Administrative Record in its decision-making processes. In the event of

approval of the Project and this MND, the City would conduct administrative reviews and issue ministerial permits to implement the Project. A list of the primary actions under City jurisdiction and the jurisdiction of other agencies is provided in Table 3-4, *Matrix of Project Approvals/Permits*. This MND covers all federal, State, local government and quasi-government approvals which may be needed to construct or implement the Project, whether or not they are explicitly listed in Table 3-4, or elsewhere in this MND (CEQA Guidelines Section 15124(d)).

Table 3-4 Matrix of Project Approvals/Permits

Public Agency	Approvals and Decisions
City of San Bernardino	
Proposed Project – City of San Bernardino Discretionary Approvals	
City of San Bernardino Development and Environmental Review Committee (D-ERC)	• Approve, approve with conditions, or deny approval of SUB22-01 and DP-D22-04. • Reject or adopt this MND along with appropriate CEQA Findings.
Subsequent City of San Bernardino Ministerial Approvals	
City of San Bernardino Subsequent Implementing Approvals	• Approve Final Maps, parcel mergers, or parcel consolidations, as may be appropriate. • Approve Conditional or Temporary Use Permits, if required. • Issue Grading Permits. • Issue Building Permits. • Approve Road Improvement Plans. • Accept public-right-of way dedications. • Approve Water Quality Management Plans (WQMPs).
Other Agencies – Subsequent Approvals and Permits	
San Bernardino Municipal Water Department (SBMWD)	• Approvals for the design of on and off-site water and sewer infrastructure connections.
San Bernardino County Fire Department	• Approval of fire hydrant locations and fire protection measures.
South Coast Air Quality Management District (SCAQMD)	• Permits and approvals associated with stationary equipment (if permits or approvals are required).
San Bernardino County Flood Control District (SBCFCD)	• Approval of drainage improvements.
Southern California Edison (SCE)	• Approval of undergrounding existing power lines and electrical transformer.
Department of Toxic Substances Control (DTSC)	• Oversight of soil removal activities and implementation of the Project's Soil Management Plan (SMP).
Santa Ana Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit. • Approval of WQMP.

4.0 Environmental Checklist Form

1. **Project Title:** San Bernardino Gateway Business Park

2. **Lead Agency Name and Address:** City of San Bernardino Community & Economic Development Department, Planning Division, 201 North E. Street, 3rd Floor, San Bernardino, CA 92401.

3. **Contact Person and Phone Number:** Travis Martin, Senior Planner, (909) 384-5567.

4. **Project Location:** Generally, south of West Rialto Avenue, east of South Arrowhead Avenue, west of South Sierra Way, and north of West Hida Street.

5. **Project Sponsor's Name and Address:** 119 Arrowhead LLC, 117777 San Vicente Boulevard, Suite 780, Los Angeles, CA 90049.

6. **General Plan Designation:** Commercial – Heavy (CH)

7. **Zoning:** CH (Commercial Heavy) Zone

8. **Description of the Project:** The Project consists of a proposal for the construction and operation of three manufacturing/business park buildings, ranging in size from 50,432 square feet (s.f.) to 106,755 s.f., on a 10.4-acre (net) property within the City of San Bernardino, California. Refer to Section 3.0 for a complete description of the proposed Project.

9. **Surrounding Land Uses and Setting:** Multi-family residential and commercial office uses to the north; heavy commercial and undeveloped land to the east; railroad tracks, undeveloped land, heavy commercial, and residential uses to the south; and heavy commercial uses to the west. Refer to subsection 2.1.2 for a detailed description of the land uses and setting surrounding the Project site.

10. **Other public agencies whose approval is required:** Refer to Table 3-4 (previously presented).

Environmental Factors Potentially Affected

The environmental factors checked below (☒) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

Determination

On the basis of this initial evaluation:

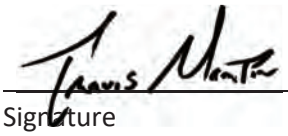
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant" 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.

☐ I find that 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.



Signature

September 14, 2023
Date

Travis Martin, Senior Planner
Printed Name

Evaluation of Environmental Impacts:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

6) Earlier Analyses Used. Identify and state where they are available for review.

   a) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   b) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

   c) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

4.1 AESTHETICS

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

a. Would the proposed Project have a substantial effect upon a scenic vista?

Determination: Less-than-Significant Impact.

Impact Analysis

Under existing conditions, the Project site does not serve as a scenic vista or contribute to a scenic vista; the Project site is vacant and undeveloped and is sparsely vegetated. Scenic resources identified by the City's General Plan include Kendall Hills, the San Bernardino Mountains, the hillsides adjacent to Arrowhead Springs, Lytle Creek Wash, East Twin Creeks Wash, the Santa Ana River, Badger Canyon, Bailey Canyon, and Waterman Canyon (San Benardino, 2005a, p. 12-22). The Project site is not located within or in close proximity to any of these areas, nor is the Project site prominently visible from these scenic resources.

Distant views of the San Bernardino Mountains are available in the Project area; however, these views of the San Bernardino Mountains to the north are partially obscured from the northern Project site boundary due to intervening development and landscaping, topography, and atmospheric haze that is common in the Inland Empire throughout the year. Due to the orientation of the San Bernardino Mountains in relation to the Project site, implementation of the Project would not alter views of the San Bernardino Mountains from Rialto Avenue because the Project would not result in any improvements/alterations to the north side of Rialto Avenue.

Based on the foregoing analysis, the Project would not have a substantial adverse effect on a scenic vista or scenic resources in the Project vicinity. Impacts would be less than significant.

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

Determination: Less-than-Significant Impact.

Impact Analysis

According to mapping information available from Caltrans, there are no officially-designated State scenic highways within the Project vicinity. The nearest officially-designated State scenic highway are segments of State Route 79 (SR-79), located approximately 21.7 miles to the southeast of the Project site, while the nearest State-eligible scenic highway is State Route 330 (SR-330), located approximately 5.9 miles northeast of the Project site. In addition, the City's General Plan designates State Route 210 (between I-10 in the south and SR-330 in the north) as an eligible scenic highway, which is located approximately 4.9 miles east of the Project site (San Bernardino, 2005a, Figure C-1). Due to intervening development, landscaping, and topography, the Project site is not prominently visible from any of these facilities, indicating that future development on site also would not be prominently visible from any of these eligible scenic highways. Furthermore, there are no trees, rock outcroppings, or historic buildings on the Project site under existing conditions. Accordingly, the proposed Project would not damage scenic resources within a state scenic highway, and impacts would be less than significant.

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?

Determination: Less-than-Significant Impact.

Impact Analysis

The United States Census Bureau defines "urbanized area" as a densely settled core of census tracts and/or census blocks that have 50,000 or more residents, and meet minimum population density requirements while also being adjacent to territory containing non-residential urban land uses. According to mapping information available from the United States Census Bureau (USCB), the Project site is located within the boundaries of the Riverside-San Bernardino Urbanized Area (USCB, 2010). As part of their review of the proposed Project, the City reviewed the Project's plans and application materials, and found that the proposed Project would be fully consistent with all applicable zoning and other regulations governing scenic quality. Furthermore, the Project would be required to comply with the design measures included as part of the Project's Development Permit (DP-D22-04), which includes a variety of features, including architectural articulation and landscaping, that would ensure implementation of the proposed Project would not substantially degrade the existing visual character or quality of public views of the site or its surroundings. Impacts would be less than significant.

d. Would the proposed Project create a new source of substantial light or glare which would adversely affect say or nighttime views in the area?

Determination: Less-than-Significant Impact.

Impact Analysis

Under the existing conditions, the Project site contains no sources of artificial lighting but artificial lighting (i.e., street lights) is present along the Project site's frontages on Arrowhead Avenue, Rialto Avenue, and Sierra Way.

The Project Applicant proposes to develop the site with three manufacturing/business park buildings and would introduce additional lighting elements on-site to illuminate the parking areas, truck docking areas, and building entrances.

Future development on the Project site would be subject to compliance with Section 19.20.030 (General Standards) of the City's Development Code, which requires that "[e]xterior lighting shall be energy-efficient and shielded or recessed so that direct glare and reflections are contained within the boundaries of the parcel, and shall be directed downward and away from adjoining properties and public rights-of-way." The City would confirm compliance with applicable lighting requirements during future review of building permit applications/plans. Mandatory compliance with Development Code Section 19.20.030 would ensure that the Project would not introduce any permanent design features that would adversely affect day or nighttime views in the area, thereby ensuring that Project impacts due to lighting would be less than significant.

With respect to glare, a majority of Project building materials would consist of tilt-up concrete panels (which is low-reflective), although the buildings would incorporate some glass elements associated with the proposed offices. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of surrounding properties, including motorists along adjacent roadways, because the glass proposed for the Project would be low-reflective and proposed landscaping would provide a buffer between all proposed glass surfaces and the public right of way. Thus, glare impacts from proposed building elements would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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 maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Would the proposed 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?

Determination: No Impact.

Impact Analysis

According to mapping information available from the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site and areas surrounding the Project site are classified as containing "Urban and Built-Up Land." There are no lands within the immediate Project vicinity that contain lands classified as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance ("Farmland"). (CDC, 2021) Accordingly, no impact to Farmland would occur with implementation of the proposed Project.

b. Would the proposed Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Determination: No Impact.

Impact Analysis

The Project site and surrounding areas all are zoned for urban, non-agricultural uses, including a mixture of commercial, residential, industrial, and public facilities zoning classifications (San Bernardino, 2007). As such, the Project has no potential to conflict with existing zoning for agricultural use. According to a listing of APNs that are subject to Williamson Act Contracts obtained from the San Bernardino County Assessor, the Project site and surrounding areas are not subject to a Williamson Act Contract. (SB County Assessor, 2021) Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c. Would the proposed 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))?

d. Would the proposed Project result in the loss of forest land or conversion of forest land to non-forest use?

Determination: No Impact.

Impact Analysis

The Project site and surrounding areas all are zoned for urban, non-agricultural uses, including a mixture of commercial, residential, industrial, and public facilities zoning classifications, and there are no lands within the City of San Bernardino that are zoned for forestry uses (San Bernardino, 2007). Accordingly, the proposed Project has no potential to 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)). In addition, as the areas surrounding the Project site are fully developed with urban and non-forest land uses, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e. Would the proposed 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?

Determination: No Impact.

Impact Analysis

As indicated under the analysis of Threshold 4.2.a through 4.2.d, there are no agricultural or forestry land uses within the immediate Project vicinity under existing conditions. As such, the Project would not 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, and no impact would occur.

4.3 AIR QUALITY

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Where available, the significance criteria established by the applicable air quality management zone or air pollution control zone may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The information in this Subsection is based in part on two Project-specific technical studies prepared by Urban Crossroads. The first report addresses the Project's potential regional and localized air quality impacts, is entitled, "S. Arrowhead Avenue Air Quality Impact Analysis" (herein, "AQIA"), is dated August 16, 2023, and is included as MND *Technical Appendix A1* (Urban Crossroads, 2023a). The second technical study addresses mobile health source impacts and is entitled, "S. Arrowhead Avenue Mobile Source Health Risk Assessment" (herein, "HRA") is dated August 16, 2023, and is included as MND *Technical Appendix A2* (Urban Crossroads, 2023b). Please refer to *Technical Appendices A1* and *A2* for a discussion of the modeling assumptions and methodologies used to estimate the Project's regional and localized air quality emissions.

a. Would the proposed Project conflict with or obstruct implementation of the applicable air quality plan?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards. (Urban Crossroads, 2023a, p. 56)

Currently, the State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. (Urban Crossroads, 2023a, p. 56)

Most recently, the SCAQMD released the Final 2022 AQMP in December 2022 (herein, "2022 AQMP"). The 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS), as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a

strategy with fair-share reductions at the federal, State, and local levels. The 2022 AQMP is designed to meet federal Clean Air Act (CAA) requirements and addresses the attainment demonstration requirements of the federal CAA for the SCAB and Coachella Valley. The 2022 AQMP also addresses the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS) of 70 parts per billion (ppb). In addition, the 2022 AQMP establishes transportation emission budgets for the standard based on the latest motor vehicle emissions model and planning assumptions. The 2022 AQMP also incorporates significant new scientific data, emissions inventories, ambient measurements, control measures, and air quality models. Similar to the 2012 and 2016 AQMPs, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. (Urban Crossroads, 2023a, p. 56)

Criteria for determining consistency with the 2022 AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below (Urban Crossroads, 2023a, p. 57):

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

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. (Urban Crossroads, 2023a, p. 57)

Construction Impacts – Consistency Criterion No. 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if Localized Significance Thresholds (LSTs) or regional significance thresholds were exceeded. As evaluated under the analyses of Thresholds b. and c., below, the Project's regional and localized construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less-than-significant impact is expected. (Urban Crossroads, 2023a, p. 57)

Operational Impacts – Consistency Criterion No. 1

As evaluated under the analyses of Thresholds b. and c., below, the Project would not exceed the applicable regional and localized significance thresholds for operational activity. Therefore, the Project would not conflict with the AQMP according to this criterion. (Urban Crossroads, 2023a, p. 57)

Conclusion – Consistency Criterion No. 1

On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion (Urban Crossroads, 2023a, p. 57).

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

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of San Bernardino General Plan is considered to be consistent with the AQMP. (Urban Crossroads, 2023a, p. 57)

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds would be exceeded, a less-than-significant impact would result. (Urban Crossroads, 2023a, p. 57)

Operational Impacts – Consistency Criterion 2

The City of San Bernardino General Plan designates the Project site as for "Commercial Heavy (CH)" uses and the Project site is zoned for "Commercial Heavy (CH)" land uses. The purpose of the CH land use designation and zoning classification is to provide large scale, regional serving retail and service uses and limited commercial and industrial uses that used for heavy indoor and outdoor uses for sales, service and/or storage.

The proposed Project includes the development of 230,320 s.f. of Manufacturing/Business Park uses within three buildings. The Project's proposed land uses are fully consistent with the site's current General Plan land use designation and zoning classification. As such, the Project's long-term operations would be consistent with the land use assumptions used by the 2022 AQMP. As such, the proposed Project would not conflict with the goals and objectives of the AQMP. (Urban Crossroads, 2023a, p. 58)

Conclusion – Consistency Criterion 2

On the basis of the preceding discussion, the Project is determined to be consistent with the second criterion (Urban Crossroads, 2023a, p. 58).

Based on the preceding analysis, the proposed Project would not conflict with or obstruct implementation of the SCAQMD 2022 AQMP, and impacts would therefore be less than significant.

b. Would the proposed 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?

Determination: Less-than-Significant Impact.

Impact Analysis

The proposed Project has the potential to generate air pollutant concentrations during both construction activities and long-term operation. The following analysis is based on the applicable significance thresholds established by the SCAQMD for regional criteria pollutant emissions, which are summarized in Table 4-1, *Maximum Daily*

Regional Emissions Thresholds. This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including SCAQMD Rule 403, "Fugitive Dust," and SCAQMD Rule 1113, "Architectural Coatings" (Urban Crossroads, 2023a, p. 38).

Air pollution causes adverse effects to human health including, but not limited to, respiratory illness and carcinogenic effects. For a detailed description of the health effects of air pollutants refer to Section 2.4 of the Project's Air Quality Report (*Technical Appendix A1*). The potential for the Project to result in substantial adverse health effects from toxic air contaminant (TAC) emissions at the local level is addressed under the analysis of Threshold 4.3.b, below. At the regional level, currently available scientific modeling does not allow for the correlation of air pollutant emissions from a single small development project like the proposed Project on 10.4 net acres to adverse health effects across the entire SCAB, which is 10,743 square miles in size (Urban Crossroads, 2023a, pp. 58-60).

Table 4-1 Maximum Daily Regional Emissions Thresholds

Pollutant	Construction Regional Thresholds	Operational Regional Thresholds
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = Pounds Per Day
(Urban Crossroads, 2023a, Table 3-1)

Impact Analysis for Construction Emissions

Construction activities associated with the Project including but not limited to site preparation; grading; building construction; paving; and architectural coating, would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Refer to Subsection 3.4 of the Project's AQIA (*Technical Appendix A1*) for a description of the inputs and assumptions used to estimate the Project's construction-related air quality emissions. (Urban Crossroads, 2023a, p. 39)

In addition, the Project would require approximately 18,250 cy of soil import and approximately 2,500 cy of soil export. It should be noted that the soil content of the soil export is contaminated and will need to be hauled to the City of Sunshine, Arizona. The shortest route for trucks exporting the contaminated soil to Arizona would take them through both the SCAB and Mojave Desert Air Basin (MDAB). Therefore, in order to calculate the hauling trip emissions related to the soil export in each passing air basin, the truck trip lengths have been calculated based on the distance from the Project site to the edge of the SCAB, which is approximately 18 miles north of the Project site at the Cajon Blvd and I-15 exit, and truck trips within the MDAB have been calculated from the edge of the MDAB to the California state line, which is a distance of 207 miles from Cajon Blvd at the I-15 exit to the California

State line. As a conservative approach, a 20-mile distance was used instead of an 18-mile distance for the hauling trip length from the Project site to the edge of the SCAB. (Urban Crossroads, 2023a, pp. 39-40)

Project construction emissions were estimated using the California Emissions Estimator Model (CalEEMod). CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions without mitigation are summarized on Table 4-2, *Overall Construction Emissions Summary – Without Mitigation*. It should be noted that the hauling emissions from the 2,500 CY of soil export within the SCAB, has been accounted for and is included in the emission totals shown on Table 4-2. Detailed construction model outputs are presented in Appendix 3.1 to the Project's AQIA (*Technical Appendix A1*). Under the assumed scenarios, emissions resulting from the Project construction within the SCAB would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Accordingly, Project-related regional air quality impacts during construction would be less than significant. (Urban Crossroads, 2023a, pp. 41-42)

Table 4-2 Overall Construction Emissions Summary – Without Mitigation

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2023	6.12	78.50	83.90	0.17	14.00	7.04
Winter						
2023	1.88	14.60	21.60	0.03	2.13	0.93
2024	29.30	23.10	34.80	0.05	2.95	1.38
Maximum Daily Emissions	**29.30**	**78.50**	**83.90**	**0.17**	**14.00**	**7.04**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

(Urban Crossroads, 2023a, Table 3-5)

Emissions associated with the 2,500 cy of soil export for truck trips within the MDAB are shown on Table 4-3, *Construction Hauling Emissions Summary – MDAB to California State Line*. As shown, Project-related haul truck trips within the MDAB would not exceed criteria pollutant thresholds established by the MDAB for emissions of any criteria pollutant. Accordingly, air quality impacts associated with the Project's haul truck emissions within the MDAB would be less than significant. Detailed construction model outputs are presented in Appendix 3.2 to the Project's AQIA (*Technical Appendix A1*). (Urban Crossroads, 2023a, p. 42)

Table 4-3 Construction Hauling Emissions Summary – MDAB to California State Line

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2023	0.15	12.10	6.15	0.07	3.02	0.93
Winter						
2023	N/A	N/A	N/A	N/A	N/A	N/A
Maximum Daily Emissions	**0.15**	**12.10**	**6.15**	**0.07**	**3.02**	**0.93**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

(Urban Crossroads, 2023a, Table 3-6)

Impact Analysis for Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: area source emissions; energy source emissions; mobile source emissions; and on-site natural-gas powered cargo handling equipment emissions. Refer to Subsection 3.5 of the Project's AQIA (*Technical Appendix A1*) for a description of the inputs and assumptions used to estimate the Project's operational-related air quality emissions. (Urban Crossroads, 2023a, pp. 43-45)

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. The estimated operational-source emissions are summarized on Table 4-4, *Summary of Operational Emissions*. Detailed operation model outputs for the Project are presented in Appendix 3.3 to the Project's AQIA (*Technical Appendix A1*). As shown on Table 4-4, the Project's daily regional emissions from on-going operations would not exceed any of the thresholds of significance. Accordingly, Project-related regional air quality impacts during long-term operation would be less than significant. (Urban Crossroads, 2023a, p. 45)

Table 4-4 Summary of Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile	2.66	14.40	39.20	0.17	4.40	1.03
Area	9.35	0.17	20.60	< 0.005	0.03	0.04
Energy Source	0	0	0	0	0	0
On-Site Equipment Source	0.12	0.38	16.44	0	0.03	0.03
Total Maximum Daily Emissions	**12.13**	**14.95**	**76.24**	**0.17**	**4.46**	**1.10**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile	2.53	15.20	32.90	0.17	4.40	1.03
Area	5.98	0	0	0	0	0
Energy Source	0	0	0	0	0	0
On-Site Equipment Source	0.12	0.38	16.44	0	0.03	0.03
Total Maximum Daily Emissions	**8.63**	**15.58**	**49.34**	**0.17**	**4.43**	**1.06**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

(Urban Crossroads, 2023a, Table 3-9)

Conclusion

Based on the foregoing analysis, the proposed Project would not 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. Impacts would be less than significant, and mitigation measures would not be required.

c. Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?

Determination: Less-than-Significant Impact.

Impact Analysis

During both construction and operation, the Project has the potential to expose nearby sensitive receptors to air pollutant concentrations that affect human health. The following provides an analysis based on the applicable LSTs established by the State of California and SCAQMD, an analysis of the Project's potential to result in or contribute to CO "hot spots," and an analysis of the Project's potential to result in cancer risks and non-cancer health hazards.

Localized Significance Thresholds

The analysis of the Project's potential localized air quality impacts makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or State ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). (Urban Crossroads, 2023a, p. 46)

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the LST Methodology. Please refer to Section 3.6 of the Project's HRA (*Technical Appendix A2*) for additional information related to the applicability of LSTs for the Project. (Urban Crossroads, 2023a, pp. 46-47)

Based on SCAQMD's LST Methodology, emissions for concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The LST Methodology clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. (Urban Crossroads, 2023a, pp. 47-48)

The "acres disturbed" for analytical purposes are based on specific equipment type for each subcategory of construction activity and the estimated maximum area a given piece of equipment can pass over in an 8-hour workday (as shown on Table 3-9 of the Project's AQIA, included as *Technical Appendix A1*). The equipment-specific grading rates are summarized in the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User's Guide *Appendix C: Emission Calculation Details for CalEEMod*. The disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. In other words, one Rubber Tired Dozer can make multiple passes over the same land area totaling 0.5 acres in a given 8-hour day. Based on Table 3-10 of the Project's AQIA, the Project's construction activities could actively disturb approximately 3.5 acres per day during site preparation and 4 acres per day during grading activities. (Urban Crossroads, 2023a, p. 48)

Sensitive Receptors

As previously stated, LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. (Urban Crossroads, 2023a, p. 48)

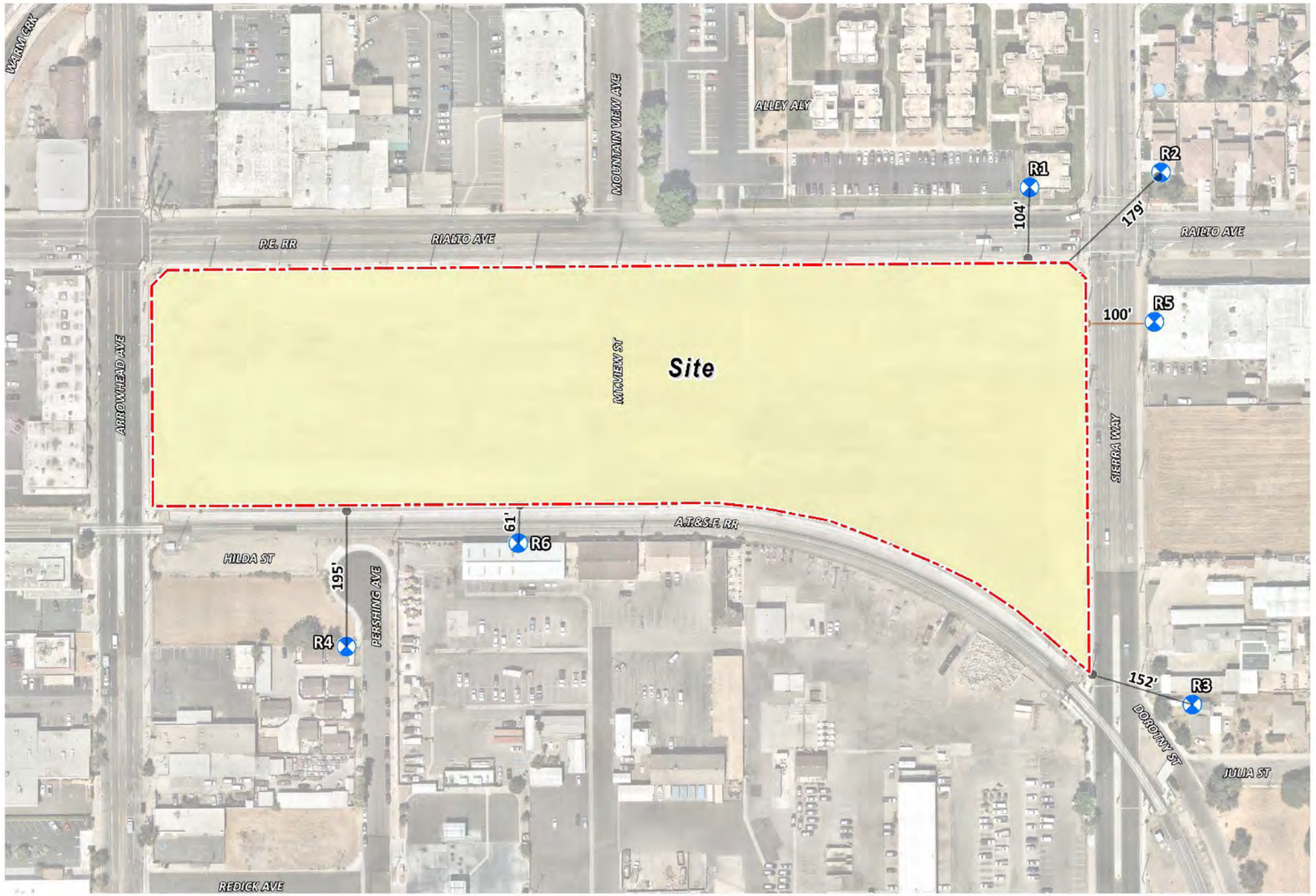
Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use where

an individual could remain for 24 hours to the Project site (in this case the existing residence at 120 West Rialto Avenue) has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. (Urban Crossroads, 2023a, pp. 48-49)

LSTs apply, even for non-sensitive land uses, consistent with LST Methodology and SCAQMD guidance. Per the LST Methodology, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, LST Methodology explicitly states that "LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours." Therefore, any adjacent land use where an individual could remain for 1 or 8-hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8-hours. (Urban Crossroads, 2023a, p. 49)

Receptors in the relative to Project area are described below and shown on Figure 4-1, *Sensitive Receptor Locations*. Localized air quality impacts were evaluated at receptor land uses nearest the Project site. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Project site. (Urban Crossroads, 2023a, p. 49)

- R1: Location R1 represents the existing apartment building at 120 West Rialto Avenue, approximately 104 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is placed at the building façade.
- R2: Location R2 represents the existing single-family residence at 101 North Sierra Way, approximately 179 feet northeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R2 is placed at the building façade.
- R3: Location R3 represents the existing single-family residence at 77 South Dorothy Street, approximately 152 feet southeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R3 is placed at the building façade.



Source(s): Urban Crossroads (08-16-2023)

Figure 4-1

Not to Scale

Sensitive Receptor Locations

- R4: Location R4 represents the existing single-family residence at 162 South Pershing Avenue, approximately 195 feet south of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R4 is placed at the building façade.

Regarding off-site worker locations to the Project site, the following locations are the nearest locations where off-site workers would be located proximate to the Project.

- R5: Location R5 represents the Hospitality Sleep Systems manufacturing warehouse at 107 E Rialto Avenue approximately 100 feet east of the Project site. Receptor R5 is placed at the building façade.
- R6: Location R6 represents the City of San Bernardino Corporation Yard at 234 South Mountain View Avenue approximately 61 feet south of the Project site. Receptor R6 is placed at the building façade.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual or a cumulatively-considerable significant impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R1 which represents the existing multi-family residence at 120 West Rialto Avenue, approximately 104 feet/32 meters north of the Project site. (Urban Crossroads, 2023a, pp. 49-50)

As previously stated, and consistent with LST Methodology, the nearest industrial/commercial use (worker location) to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized impacts of NO_X and CO is represented by location R5 which represents Hospitality Sleep Systems manufacturing warehouse at 107 E Rialto Avenue, approximately 100 feet/30 meters east of the Project site. Although Receptor Location R6 is closer to the Project site, Receptor Location R5 occurs closer to the highest concentration of site activities, including the two eastern access driveways that would serve Project-related truck trips. As such, Receptor R5 would be the most impacted location for purposes of this LST analysis. (Urban Crossroads, 2023a, p. 50)

Construction-Source Emissions Localized Emissions

Localized Thresholds for Construction Activity

Since the total acreage disturbed is 3.5 acre per day for site preparation and 4 acres per day grading activities, the SCAQMD's screening look-up tables are utilized in determining impacts. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds presented in Table 4-5, *Maximum Daily Localized Construction Emissions Thresholds*, were calculated by interpolating the threshold values for the Project's disturbed acreage. (Urban Crossroads, 2023a, p. 52)

Table 4-5 Maximum Daily Localized Construction Emissions Thresholds

Construction Activity	Construction Localized Thresholds			
	NO_X	CO	PM_{10}	PM_{10}
Site Preparation	226 lbs/day	1,473 lbs/day	17 lbs/day	7 lbs/day
Grading	243 lbs/day	1,607 lbs/day	19 lbs/day	7 lbs/day

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

(Urban Crossroads, 2023a, Table 3-11)

Construction-Source Localized Emissions

Table 4-6, *Localized Construction-Source Emissions*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criterial pollutant. For analytical purposes, emissions associated with peak site preparation and grading activities are considered for purposes of LSTs since these phases represents the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. Accordingly, and based on Table 4-6, the Project's localized construction-related emissions would be less than significant at the nearest sensitive receptors. (Urban Crossroads, 2023a, p. 52)

Table 4-6 Localized Construction-Source Emissions

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation	2023	47.00	38.00	8.19	5.02
	Maximum Daily Emissions	**47.00**	**38.00**	**8.19**	**5.02**
	SCAQMD Localized Threshold	226	1,473	17	7
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	2023	19.90	36.20	2.86	1.16
	Maximum Daily Emissions	**19.90**	**36.20**	**2.86**	**1.16**
	SCAQMD Localized Threshold	243	1,607	19	7
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

(Urban Crossroads, 2023a, Table 3-12)

Operational-Source Localized Emissions

The Project is located on an approximately 10.4 net-acre parcel. As noted previously, the LST Methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine whether pollutants require additional detailed analysis. This approach is conservative as it assumes that all on-site emissions associated with the project would occur within a concentrated 5-acre area. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required. (Urban Crossroads, 2023a, p. 53)

Outputs from the model runs for operational LSTs are provided in Appendix 3.3 to the Project's AQIA (*Technical Appendix A1*). Table 4-7, *Maximum Daily Localized Emissions Thresholds*, presents the LSTs for a 5-acre site, which was used as a screening tool to determine if further detailed analysis of Project operational-source LSTs is required. (Urban Crossroads, 2023a, p. 53)

Table 4-7 Maximum Daily Localized Emissions Thresholds

Operational Localized Thresholds			
NO_X	CO	PM_{10}	PM_{10}
276 lbs/day	1,876 lbs/day	6 lbs/day	2 lbs/day

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

(Urban Crossroads, 2023a, Table 3-13)

As shown on Table 4-8, *Localized Significance Summary of Operations*, operational emissions would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project would have a less-than-significant localized impact during operational activity. (Urban Crossroads, 2023a, p. 53)

Table 4-8 Localized Significance Summary of Operations

Scenario	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Summer	1.92	25.60	0.09	0.05
Winter	1.83	5.59	0.06	0.02
Maximum Daily Emissions	**1.92**	**25.60**	**0.09**	**0.05**
SCAQMD Localized Threshold	276	1,876	6	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

(Urban Crossroads, 2023a, Table 3-14)

CO "Hot Spot" Analysis

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment. (Urban Crossroads, 2023a, p. 53)

As shown on Table 3-17 of the Project's AQIA (*Technical Appendix A1*), the highest trips on a segment of road for the proposed Project during AM and PM traffic is 1,452 vph and 1,606 vph, respectively, on Arrowhead Ave. and Rialto Ave. As such, and as more fully explained in Subsection 3.9 of the Project's AQIA, the Project considered herein would not produce the volume of traffic required to generate or significantly contribute to a CO "hot spot."

Therefore, CO "hot spots" are not an environmental impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. (Urban Crossroads, 2023a, p. 55)

Project-Related DPM Source Cancer and Non-Cancer Risks

A Project-specific HRA was prepared for the Project based on SCAQMD guidelines to produce conservative estimates of risk posed by exposure to DPM. The Project's HRA is included as *Technical Appendix A2* to this EIR. Refer to Section 2 of the Project's HRA for a discussion of the recommended methodology, emissions estimation, exposure quantification, carcinogenic chemical risk, and non-carcinogenic exposure used as inputs to the analysis. Nearby sensitive receptors evaluated as part of the HRA are described above and are depicted on Figure 4-1. According to the MATES-V model, the Project site and immediately surrounding area are exposed to a predicted a cancer risk of 464 per million under existing conditions (Urban Crossroads, 2023a, p. 36). Provided below is a summary of the results of the HRA for Project-related construction activities, the Maximally Exposed Individual Receptor (MEIR), the Maximally Exposed Individual Worker (MEIW), and the Maximally Exposed Individual School Child (MEISC).

Construction-Related DPM Impacts

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R1 (refer to Figure 4-1) which is located approximately 104 feet north of the Project site at an existing multi-family residential building located at 120 West Rialto Avenue. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R1 is placed at the building façade facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 3.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. Furthermore, it should be noted that haul truck trips associated with the export of contaminated soil would be routed north along Arrowhead Avenue and west on 2nd Street to access the I-215, and no haul truck trips would pass by the H. Frank Dominguez Elementary School, which is located approximately 1,170 feet east of the Project site. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. (Urban Crossroads, 2023b, p. 22)

Operational-Related DPM Impacts

Residential Exposure Scenario

The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R4 (refer to Figure 4-1) which is located approximately 195 feet south of the Project site at an existing residence located at 162 South Pershing Avenue. Since there are no private outdoor living areas (backyards) facing the Project site, receptor R4 is placed at the building façade facing the Project site. Receptor Location R4 is the location that would experience the highest concentration of diesel particulate matter during ongoing operation of the Project, despite not being the closest residential receptor to the site. This is due to the configuration of truck routes and loading docks on the Project site, as well as meteorological conditions (i.e., wind speed and direction) in the Project vicinity. Thus, although Receptor Location 1 is closer to the site than Receptor Location 4, Receptor Location 4 represents the MEIR. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 0.68 in one million, which is less than the SCAQMD's

significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences, and impacts would be less than significant. (Urban Crossroads, 2023b, pp. 22-23)

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R6, which represents the adjacent potential worker receptor approximately 61 feet south of the Project site. At the MEIW, the maximum incremental cancer risk impact is 0.17 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers, and impacts would be less than significant. (Urban Crossroads, 2023b, p. 23)

School Child Exposure Scenario

The nearest school is H. Frank Dominguez Elementary School, which is located approximately 1,170 feet east of the Project site. It should be noted that all of the Project's heavy truck trips would be routed north along Arrowhead Avenue and west on 2nd Street to access I-215, and none of the Project's heavy truck trips would occur along roadways abutting the H. Frank Dominguez Elementary School. At the MEISC, the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.02 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to nearby school children, and impacts would be less than significant. (Urban Crossroads, 2023b, p. 23)

Construction and Operational Impacts

The land use with the greatest potential increased cancer risk due to exposure to Project construction-source and operational-source DPM emissions is Location R1. As shown in Table ES-3 of the Project's AQIA (*Technical Appendix A1*), at this location, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 3.50 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location. Accordingly, Project-related DPM impacts would be less than significant. (Urban Crossroads, 2023b, p. 23)

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As explained in detail in Subsection 3.11 of the Project's AQIA (*Technical Appendix A1*), SCAQMD concluded that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects." Additionally, the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) found that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NO_X, SO_X, and VOCs produced by a source. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. Furthermore, because the Project's emissions would comply with federal, State, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled. (Urban Crossroads, 2023a, pp. 58-60)

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

Determination: Less-than-Significant Impact.

Impact Analysis

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required. (Urban Crossroads, 2023a, p. 60)

4.4 BIOLOGICAL RESOURCES

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

A Biological Resources Technical Report ("BRTR") was prepared for the Project by CADRE Environmental, Inc. (CADRE). This report documents the existing biological resources on the Project site and evaluates the potential impacts to these resources that may occur as a result of Project implementation. This report is entitled, "Biological Resources Technical Report, Arrowhead Avenue Industrial Development," is dated January 2022, and is included as Appendix B to this Initial Study/MND (CADRE, 2022).

a. Would the proposed 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 Wildlife or U.S. Fish and Wildlife Service?

Determination: Less than Significant Impact with Mitigation Incorporated.

Impact Analysis

Special-Status Plants

The Project site is characterized as heavily disturbed with compacted soils. No native undisturbed suitable habitat, native soils or sensitive plant species observations were documented or are expected to occur within the Project site. Accordingly, no impacts to special-status plant species would occur with implementation of the proposed Project. (CADRE, 2022, pp. 19, 28)

Special-Status Wildlife

No suitable habitat for species listed as federal or State threatened/endangered was documented within the Project site. No sensitive wildlife species or undisturbed native habitats were documented within the Project Site. Due to the heavily-disturbed nature of the Project site, no impacts to special-status wildlife species would occur with implementation of the proposed Project. (CADRE, 2022, pp. 21, 25, 28)

Notwithstanding the analysis above, the Project site could be used by nesting avian species that are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC Sections 3503.5 to 3513). Pursuant to the MBTA and CFGC, take of a protected species individual, their egg(s), or their nest is prohibited and the Project Applicant would be required to comply with Mitigation Measure MM BR-1, below, to ensure compliance with the respective regulations. Mitigation Measure MM BR-1 would reduce potential impacts to the nesting birds to less-than-significant levels by ensuring that pre-construction surveys are conducted to determine the presence or absence of nesting birds on or adjacent to the Project site prior to the commencement of construction activities. If active bird nests are present, this mitigation measure provides performance criteria that requires avoidance of the nests until it can be determined the nest is no longer active or that the juveniles from the occupied nests are capable of surviving independently of the nest. (CADRE, 2022, p. 29)

Conclusion

Based on the foregoing analysis, and assuming implementation of Mitigation Measure MM BR-1, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and impacts would be mitigated to below a level of significance. (CADRE, 2022, p. 28)

b. Would the proposed 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 Wildlife or US Fish and Wildlife Service?

Determination: No Impact.

Impact Analysis

The entire Project site is characterized as disturbed habitat with indications that annual clearing occurs throughout the property. The soils are heavily compacted and the majority of the western portion of the site is characterized as decomposed granite substrate. This vegetation community is dominated by cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), wild oat (*Avena fatua*), ripgut brome (*Bromus diandrus*), and annual sunflower (*Helianthus annus*). The Project site is completely surrounded by existing commercial and residential developments and high traffic roads. No riparian, sensitive or undisturbed native/natural habitats were documented within or adjacent to the Project site. An adjacent unvegetated concrete flood control channel located immediately south of the Project site would not be directly or indirectly impacted with implementation of the Project. (CADRE, 2022, pp. 6, 28, 29) Accordingly, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS), and no impact would occur.

c. Would the proposed 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?

Determination: Less-than-Significant Impact.

Impact Analysis

No wetlands or jurisdictional resources regulated by the United States Army Corps of Engineers (USACE), CDFW or Regional Water Quality Control Board (RWQCB) occur within the Project Site. The Project site is located immediately north and outside of an existing concrete lined flood control channel, and the Project would not result in any direct impacts to this existing off-site drainage channel. (CADRE, 2022, p. 11) With respect to indirect impacts to the off-site drainage channel, with development of the site as proposed all runoff from the Project site would be directed into existing drainage facilities within Rialto Avenue and Sierra Way, and no runoff from the developed portions of the Project site would be conveyed to the existing off-site drainage channel to the south. Accordingly, the Project would not 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, and impacts would be less than significant.

d. Would the proposed 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?

Determination: No Impact.

Impact Analysis

The Project Site is heavily disturbed, is surrounded by existing high traffic roads and urban development, and does not represent a wildlife movement corridor or route between open space habitats under existing conditions. The adjacent unvegetated concrete flood control channel located immediately south of the Project site does not represent a wildlife movement corridor, and would not be directly or indirectly impacted as a result of Project implementation. Additionally, the Project site does not contain any native wildlife nursery sites, and no wildlife nursery sites occur within the Project vicinity. Accordingly, the Project would not 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, and no impact would occur. (CADRE, 2022, p. 29)

e. Would the proposed Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Determination: No Impact.

Impact Analysis

No trees are located within the Project site or abut the Project site under existing conditions; thus, the Project has no potential to conflict with the City's regulations with respect to trees, as outlined in Chapter 12.40 (Street Trees) and Chapter 15.34 (Removal or Destruction of Trees) of the City's Municipal Code. The Project site does not occur within the City's Hillside Management Overlay Zone, and as such the Project is not subject to compliance with Chapter 19.17 (HM [Hillside Management Overlay] Zone) of the City's Development Code. Additionally, based on the City's review of the Project's application materials, the proposed Project would not conflict with any of requirements set forth in Title 19 (Land Use/Subdivision Regulations) of the City's Development Code. There are no other local policies or ordinances protecting biological resources that are applicable to the proposed Project. (CADRE, 2022, p. 29) Accordingly, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

f. Would the proposed 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?

Determination: No Impact.

Impact Analysis

The Project site is not located within or adjacent to any areas subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Additionally, the Project Site is not located within or adjacent to the adopted "Draft West Valley Habitat Conservation Plan" for the Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*; "DSF"). Therefore, implementation of the project would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan, and no impact would occur.

Mitigation

MM BR-1 Vegetation-clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1st through August 31st), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a) A ground nesting bird survey shall be conducted on the Project site by a qualified biologist within 14 days prior to initiating vegetation clearing or ground disturbance. The survey shall consist of full coverage of the proposed disturbance limits, determined by the biologist and taking into

account the species nesting in the area and the habitat present. If no active nests are found, no additional measures are required.

b) If the survey identifies the presence of active ground nests, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near fledging) recorded. The biologist shall establish a no-disturbance buffer around each active nest (typically no less than 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors). The buffer area shall be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist with City concurrence verify that the nests are no longer occupied and/or juvenile birds can survive independently from the nests.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Physically disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

A Cultural Resources Study ("CRS") was prepared for the Project by Brian F. Smith and Associates, Inc. (BFSA). This report is entitled, "Cultural Resources Study for the 119 South Arrowhead Avenue Project," is dated October 13, 2022, and is included as *Technical Appendix C1* to this Initial Study/MND (BFSA, 2022a). The cultural resources study of the Project site consisted of an institutional records search, archival research, an intensive cultural resource survey of the Project site, and the preparation of a technical report.

a. Would the proposed Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Determination: Less than Significant Impact with Mitigation Incorporated.

Impact Analysis

According to CEQA (§ 15064.5(a)), the term "historical resource" includes the following:

1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources (CRHR) (Public Resources Code § 5024.1, Title 14 CCR. Section 4850 et seq.).

2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey, meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3) Any object, building, structure, site, area, place, record, or manuscript, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Public Resources Code SS5024.1, Title 14, Section 4852) including the following:

    a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    b) Is associated with the lives of persons important in our past;

    c) 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; or

    d) Has yielded, or may be likely to yield, information important in prehistory or history.

4) The fact that a resource is not listed in, or determined eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to Section 5020.1[k] of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1[g] of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Section 5020.1(j) or 5024.1.

The survey of the Project site conducted by BFSA in February 2022 resulted in the identification of several historic artifacts on the ground surface, primarily on the eastern half of the property. The artifacts consisted of potsherds of ironstone (some with the "Flow Blue" transfer-printed motif), glass (some solarized) from bottles and windows, and some unidentified metal fragments. Slag was also noted that likely is associated with the Hanford Foundry operation. A notable increase in artifacts was noted along the north side of a concrete culvert where dirt was apparently excavated when the culvert ditch was excavated for construction. The greater quantity of historic artifacts in the disturbed dirt from the culvert construction appeared to reflect the presence of buried historic materials in this area of the property. (BFSA, 2022a, p. 6.0-1)

The artifacts observed appeared to reflect a time period from the late nineteenth century to the early twentieth century (BFSA, 2022a, p. 6.0-4). Because the surface of the property was affected by previous demolition and grading when the Hanford Foundry facility and other structures were removed through the 1960s and 1980s, the spread of historic artifacts across the east side of the property did not provide any indications of historic deposits or features. Given the early date of the construction of the Hanford Foundry (1892) and the likely presence of

other structures at this location prior to 1883, BFSA determined that there was a strong potential for buried historic structures (BFSA, 2022a, pp. 6.0-4, 6.0-5).

In order to assess the potential for historic resources to be buried beneath the site's surface, BFSA prepared and the City approved an Archaeological Testing Program (ATP). The ATP recommended mechanical trenching at 10 to 16 locations selected as the most likely to intersect with historic features based upon historic lithograph and Sanborn map information. Thirteen test trenches were excavated as part of the testing program. The archaeological testing program resulted in the identification of one collapsed brick wall (Feature A), one concrete pad (Feature B), one concrete and rebar footer (Feature C), and one historic refuse deposit (Feature D). All four features were identified in the western portion of the property and are associated with the structures shown on the 1906 Sanborn Map, and all four features were identified as Site 119-Temp-1. The test trenching conducted by BFSA indicates that intact areas associated with the early development of the block are present within the western portion of the property, approximately one foot below the ground surface. The eastern portion of the property is characterized as highly disturbed and only contains limited historic items associated with the demolition of the Hanford Foundry between 1988 and 1989. Given the level of disturbance of the entire property, and following the preliminary analysis, Site 119-Temp-1 was determined to be not significant according to CEQA criteria. Specifically, Site 119-Temp-1 is not eligible for listing in the CRHR because the identified resources do not meet the definitions of Public Resources Code § 5024.1 (as discussed below). Site 119-Temp-1 also is not a resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code. In addition, Site 119-Temp-1 is not considered "historically significant" because the resources are not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Public Resources Code § 5024.1(c)(1)); are not associated with the lives of persons important in our past (Public Resources Code § 5024.1(c)(2)); do not embody the distinctive characteristics of a type, period, region, or method of construction, and do not represent the work of an important creative individual, and do not possess high artistic values (Public Resources Code § 5024.1(c)(3)); and Site 119-Temp-1 has not yielded, and is not likely to yield, information important in prehistory or history (Public Resources Code § 5024.1(c)(4)). Although Site 119-Temp-1 does not comprise a significant historical resource according to CEQA criteria and Public Resources Code § 5024.1, the features have been registered as a historic site with the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. (BFSA, 2022a, pp. 1.0-1 and 7.0-1)

Based upon an overall lack of research potential resulting from demolition disturbance and the information gathered by the testing program, the Project site was determined to be lacking documented potentially significant cultural features or deposits. Based upon the very limited identification of partially intact historic deposits (limited to the western end of the property) at the Project site and the limited research potential represented by the identified features, the planned development of the property would not impact any known significant historic resources.

While no historically significant elements of the historic site were exposed, results of the archaeological testing and significance evaluation indicate that the potential to discover additional historic deposits on the property is high, and some of those features may not have been affected by past demolition and, therefore, could contain significant historical data. As such, the potential for the Project's construction activities to unearth significant historic resources is determined to be a potentially significant impact. Mitigation Measure MM CR-1 requires archaeological monitoring during all future excavations on site, and requires the continued documentation of the

identified features and recovery of artifacts associated with the features. MM CR-1 also requires the preparation and implementation of an Archaeological Monitoring Plan to outline the procedures and protocols to be followed should discoveries be made during grading and excavations to ensure that any potential impacts to significant historic resources are mitigated to less than significant. In addition, the required mitigation requires that artifacts collected as a result of the testing program shall be included in a curation program with any other artifacts recovered during the mitigation monitoring program. With implementation of Mitigation Measure MM CR-1, Project impacts to previously-undiscovered historical resources that may be present beneath the site's surface would be reduced to less-than-significant levels. (BFSA, 2022a, pp. 7.0-1 and -2)

b. Would the proposed Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Determination: Less-than-Significant Impact with Mitigation Incorporated.

Impact Analysis

Based on the results of the Project's CRA (*Technical Appendix C1*), aside from historic artifacts as discussed under the analysis of Threshold 4.5.a, no prehistoric Native American artifacts were noted during the survey conducted by BFSA. The location of the property and the past disturbances at the Project site indicate the Project site is not a good candidate for the presence of buried Native American sites or features. As such, it is unlikely that prehistoric artifacts exist beneath the surface of the Project site. While no prehistoric cultural resources have been identified on or within the vicinity of the Project site, the early development of the property as an orchard and later a foundry could have affected the potential to identify prehistoric Native American resources on the surface of the property. Generally speaking, the City of San Bernardino has been identified by representatives of the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) and the Yuhaaviatam of San Manuel Nation as an area of tribal interest. Given the tribal interest in this general area and the potential that prehistoric Native American artifacts or sites could be encountered during trenching, the Project Applicant shall allow for monitoring of excavations on site by Native American representatives from either the Kizh Nation or the San Yuhaaviatam of San Manuel Nation as part of the ATP required pursuant to Mitigation Measure CR-1. With implementation of Mitigation Measure CR-1, including the requirement to allow for Native American monitoring during site excavation activities, implementation of the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5, and impacts would be less than significant. (BFSA, 2022a, p. 6.0-5)

c. Would the proposed Project physically disturb any human remains, including those interred outside of formal cemeteries?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code § 7050.5, "Disturbance of Human Remains."

According to § 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code § 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code § 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance with California Health and Safety Code § 7050.5 and California Public Resources Code § 5097 et seq., the proposed Project would not physically disturb any human remains; therefore, impacts would be less than significant.

Mitigation

MM CR-1 Prior to issuance of grading permits, the City of San Bernardino shall condition the Project to require implementation of the Project's approved Archaeological Test Plan (ATP), a draft of which is included as Appendix F to the Project's Cultural Resources Study (CRS), which is included as *Technical Appendix C1* to the Project's Initial Study/Mitigated Negative Declaration (MND). The required ATP shall include details regarding research design as well as a plan for testing and recordation of any resources that may be uncovered. The ATP shall require that any surface artifacts exposed by earthwork or trenching shall be mapped, recorded, and collected. The ATP also shall require the excavation of mechanical trenches at locations determined to have a high potential for historic deposits. Mechanical trenching shall serve to identify the composition of any subsurface archaeological deposits encountered, and the trenches shall be placed in or near areas of estimated historic deposit locations. If the trenching program identifies intact and potentially significant historic or prehistoric deposits, the ATP shall require a more focused investigation. Furthermore, the ATP shall require that if archaeological features or deposits are discovered, the discovery shall be recorded, and Department of Parks and Recreation (DPR) forms shall be registered at the South Central Coastal Information Center (SCCIC) at CSU Fullerton. Additionally, all subsurface investigations and ground-disturbing activities at the Project site shall be monitored by Native American representatives from either the Kizh Nation or the Yuhaaviatam of San Manuel Nation, at the City's discretion. Finally, all information gathered from the fieldwork, laboratory analysis, and research shall be incorporated into a technical report following City of San Bernardino guidelines and requirements, which shall be reviewed and approved by the City prior to final grading inspection.

4.6 ENERGY

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The analysis in this Subsection is based in part on the information contained in the Project's Energy Analysis Report ("Energy Analysis"), titled "S. Arrowhead Avenue Energy Analysis," dated September 26, 2022, and appended to this MND as *Technical Appendix D* (Urban Crossroads, 2023c). The Energy Analysis was prepared for the Project by Urban Crossroads to quantify anticipated energy usage associated with the construction and operation of the proposed Project, determine if the usage amounts are efficient, typical, or wasteful for the land use type, and identify any potential methods of avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Refer to Section 2 of the Project's Energy Analysis for an overview of the existing energy conditions in the Project region, and refer to Subsection 4.2 of the Energy Analysis for a discussion of the methodology used to estimate the Project's energy demands.

a. Would the proposed Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Determination: Less-than-Significant Impact.

Impact Analysis

Provided below is an analysis of the Project's potential to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during both Project construction and long-term operation. Please refer to Subsection 4.3 of the Project's Energy Analysis (*Technical Appendix D*) for a discussion of the inputs and methodology used to estimate the Project's energy consumption during construction activities, and refer to Subsection 4.4 of the Project's Energy Analysis for a discussion of the inputs and methodology used to estimate the Project's operational energy demands.

Construction Energy Demands and Energy Efficiency/Conservation Measures

As shown on Table 4-3 of the Project's Energy Analysis (*Technical Appendix D*), the total electricity usage from on-site Project construction-related activities is estimated to be approximately 95,267 kWh. As presented in Table 4-5 of the Project's Energy Analysis, Project construction activities would consume an estimated 35,141 gallons of diesel fuel. Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 14,795 gallons of fuel, as shown in Table 4-7 of the Project's Energy Analysis. Additionally, fuel

consumption from construction vendor trips (Medium-Heavy Duty and Heavy-Heavy Duty) would total approximately 17,702 gallons, as shown in Table 4-8 of the Project's Energy Analysis. (Urban Crossroads, 2023c, pp. 29-36)

Starting in 2014, CARB adopted the nation's first regulation aimed at cleaning up off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turnover the oldest and dirtiest equipment to newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel. (Urban Crossroads, 2023c, p. 36)

Construction contractors would be required to comply with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption. (Urban Crossroads, 2023c, p. 36)

Additional construction-source energy efficiencies would occur due to required California regulations and best available control measures (BACM). For example, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Section 2449(d)(3) requires that grading plans shall reference the requirement that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling." In this manner, construction equipment operators are required to be informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints. (Urban Crossroads, 2023c, p. 36)

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing, and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2023c, pp. 36-37)

As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, and impacts would therefore be less than significant (Urban Crossroads, 2023c, p. 39).

Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation fuel demands (fuel consumed by passenger car and truck vehicles accessing the Project site), fuel demands from operational equipment, and facilities energy demands (energy consumed by building operations and site maintenance activities). (Urban Crossroads, 2023c, p. 37)

As summarized on Table 4-9 of the Project's Energy Analysis, the Project would result in 3,740,756 annual vehicle miles traveled (VMT) and an estimated annual fuel consumption of 292,847 gallons of fuel. As presented in Table 4-10 of the Project's Energy Analysis (*Technical Appendix D*), Project on-site equipment would consume an estimated 4,642 gallons of natural gas. Annual electricity demands of the Project are summarized in Table 4-10 of the Project's Energy Analysis, which indicates that the Project would result in a demand for 1,116,304 kWh/year of electricity. (Urban Crossroads, 2023c, pp. 37-38)

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards, and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title24, California Green Building Standards Code). (Urban Crossroads, 2023c, p. 38)

Project annual fuel consumption estimates presented in Table 4-9 of the Project's Energy Analysis (*Technical Appendix D*) represent likely potential maximums that would occur for the Project. Under subsequent future conditions, average fuel economies of vehicles accessing the Project site can be expected to improve as older, less fuel-efficient vehicles are removed from circulation, and in response to fuel economy and emissions standards imposed on newer vehicles entering the circulation system. (Urban Crossroads, 2023c, p. 39)

Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project would implement sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and County requirements, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2023c, p. 40)

The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses of similar scale and configuration. Lastly, the Project would comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2023c, p. 40)

Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Impacts would therefore be less than significant. (Urban Crossroads, 2023c, p. 40)

b. Would the proposed Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Determination: Less-than-Significant Impact.

Impact Analysis

A summary of the Project's consistency with applicable regulations and requirements is provided below.

Consistency with ISTEA

ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. (Urban Crossroads, 2023c, p. 22)

Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site. (Urban Crossroads, 2023c, p. 42)

Consistency with TEA-21

TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2023c, p. 22)

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. (Urban Crossroads, 2023c, p. 42)

Consistency with IEPR

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301[a]). The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report. (Urban Crossroads, 2023c, p. 22)

The 2021 IEPR was adopted February 22, 2022, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Additionally, the 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. (Urban Crossroads, 2023c, pp. 22-23)

Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project would be consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2021 IEPR. Additionally, the Project would comply with the applicable Title 24 standards, which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR. (Urban Crossroads, 2023c, p. 42)

Consistency with the State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access. (Urban Crossroads, 2023c, p. 23)

The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. (Urban Crossroads, 2023c, p. 43)

Consistency with California Code Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. (Urban Crossroads, 2023c, p. 23)

The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. Therefore, the Project would not conflict with any applicable provisions of Title 24. (Urban Crossroads, 2023c, p. 43)

Consistency with California Code Title 24, Part 11, CALGreen

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that will be effective on January 1, 2023. Refer to subsection 3.2.3 of the Project's Energy Analysis (*Technical Appendix D*) for as listing of applicable Title 24, Part 11 measures for nonresidential uses. (Urban Crossroads, 2023c, p. 23)

As previously stated, CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that were published on July 1, 2022, and will become effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. (Urban Crossroads, 2023c, p. 43)

Consistency with AB 1493

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption. (Urban Crossroads, 2023c, p. 25)

AB 1493 is not applicable to the Project as it is a Statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. (Urban Crossroads, 2023c, p. 43)

Consistency with RPS

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33% of total retail sales by 2020 (Urban Crossroads, 2023c, p. 25).

California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS (Urban Crossroads, 2023c, p. 43).

Consistency with SB 350

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions: (Urban Crossroads, 2023c, pp. 25-26)

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

The proposed Project would use energy from SCE, which have committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. (Urban Crossroads, 2023c, p. 43)

Conclusion

Based on the preceding analysis, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant (Urban Crossroads, 2023c, p. 43).

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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	☐	☐	☐	☒

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

In order to evaluate the Project's potential impacts due to geology and soils, a Project-specific technical report was prepared by NorCal Engineering (herein, "NorCal"). This report is entitled, *Geotechnical Engineering Investigation, Proposed Industrial Warehouse Development 119 South Arrowhead Avenue, San Bernardino, California* (herein, "Geotechnical Report"), is dated October 27, 2021, and is included as *Technical Appendix E1* to this MND (NorCal, 2021). In addition, in order to evaluate potential impacts to paleontological resources, a site-specific technical study was prepared by Brian F. Smith and Associates (BFSA), which is entitled, "Paleontological Assessment for the 119 South Arrowhead Avenue Project," is dated March 4, 2022, and is included as *Technical Appendix E2* to this MND (BFSA, 2022b).

a.(i). Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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.

Determination: No Impact.

Impact Analysis

The Project site is not located within an Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered unlikely. The nearest fault is located approximately 4 kilometers from the site and is capable of producing a Magnitude 6.7 earthquake. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. (NorCal, 2021, p. 5) Because the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and no known earthquake faults occur on site, there is no potential for the Project to result in potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. No impact would occur.

a.(ii). Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Determination: Less-than-Significant Impact.

Impact Analysis

Although no earthquake faults occur within the Project boundaries, the Project site is located in a seismically active area of Southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the Southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed structures in accordance with Section 1613 of the 2022 California Building Code (CBC), which identifies design features required to be implemented to resist the effects of seismic ground motions. With mandatory compliance to the 2022 California Building Code requirements, or applicable building code at the time of Project construction, future Project employees and structures would not be exposed to substantial adverse ground-shaking effects associated with Alquist-Priolo Earthquake Fault Zones or other earthquake faults. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant.

a.(iii). Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site is expected to experience ground shaking and earthquake activity that is typical of the Southern California area. It is during severe shaking that loose, granular soils below the groundwater table can liquefy. Based on review of the *County of San Bernardino County Land Use Plan - General Plan - Geologic Hazard Overlays* (2009), the site lies within a zone of "Suspected Liquefaction Susceptibility." A review with the State of California Department of Water Recourses of nearby water wells within ½ mile from the subject site revealed historical groundwater levels at a depth of about 14 feet below ground surface in 1988. The liquefaction evaluation conducted by NorCal utilized the nearest mode of predominate Magnitude 6.7 Mw earthquake in their earthquake calculations. The analysis indicates the potential for liquefaction at the Project site to be low based upon a historic groundwater depth of about 14 feet deep and a Peak Ground Acceleration (PGA_M) of 1.037g. The associated

seismic-induced settlements would be on the order of ¾ inch and would occur rather uniformly across the site. Differential settlements would be on the order of ½ inch over a 50-foot (horizontal) distance. (NorCal Engineering, 2021, pp. 5-6) Pursuant to conditions of approval to be imposed on the Project by the City of San Bernardino, the Project would be subject to compliance with the recommendations of the Project's Geotechnical Report, or the recommendations of future geotechnical reports required for grading and building permits. The Project's Geotechnical Report includes site-specific recommendations to address the potential for seismic-induced settlement and differential settlements. With mandatory compliance with the recommendations of the Project's Geotechnical Report (or the geotechnical report(s) prepared in conjunction with building or grading permits), the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Impacts would be less than significant.

a.(iv). Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Determination: No Impact.

Impact Analysis

The Project site occurs in a portion of the City of San Bernardino that is largely developed with urban land uses. There are no prominent hillsides in the Project vicinity that could result in potential landslide hazards, and there are no such hillsides within the boundaries of the Project site (Google Earth, n.d.). Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur.

b. Would the proposed Project result in substantial soil erosion or the loss of topsoil?

Determination: Less-than-Significant Impact.

Impact Analysis

Proposed grading activities associated with the Project would temporarily expose underlying soils to water and air, which would increase erosion susceptibility while the soils are exposed. Exposed soils would be subject to erosion during rainfall events or high winds due to the removal or stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading and before the Project's structure foundations are established and paving and landscaping occur. Erosion by wind would be highest during period of high wind speeds when soils are exposed.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. The NPDES permit is required for all project that include construction activities, such as clearing, grading, and/or excavations that disturb at least one acre of total land area. Additionally, during grading and other construction activities involving soil exposure of the transport of earth materials, Chapter 8.80 (Storm Water Drainage System) of the City's Municipal Code would apply, which establishes, in part, requirements for the control of dust and erosion during construction, would apply to the Project. The Project Applicant would be required pursuant to Section 8.80.501 of the City's Municipal Code to prepare a Storm Water Quality Management Plan (SWQMP). Compliance with the NPDES permit and the Project's SQWMP would require the preparation and implementation of a SWPPP for construction-related activities that would address construction fencing, sand bags, and other erosion-control

features that would be implemented during the construction phase to reduce the site's potential for soil erosion or the loss of topsoil. Requirements for the reduction of particulate matter in the air also would apply, pursuant to SCAQMD Rule 403. Mandatory compliance with the NPDES permit and these regulatory requirements would ensure that water and wind erosion impacts during construction would be less than significant.

Following construction, wind and water erosion on the Project site would be minimized, as the areas disturbed during construction would be landscaped or covered with impervious surfaces. Only nominal areas of exposed soils, if any, would occur in the site's landscaped areas. The only potential for erosion effects to occur during Project operation would be indirect effects from stormwater discharged from the property. As detailed in the Project-specific Hydrology Report prepared by Thienes Engineering, Inc ("Thienes"; *Technical Appendix H1*), with implementation of the Project's drainage system (as described in detail in subsection 3.1.2.G.4), peak flows to the Rialto Avenue catch basin would decrease from 14.9 cfs to 13.8 cfs, while peak flows to the Sierra Way catch basin would nominally increase from 4.7 cfs to 4.8 cfs (Thienes, 2022a). Accordingly, total peak runoff from the site would not substantially increase with Project implementation, thereby demonstrating that the Project would not substantially increase erosion hazards downstream as compared to existing conditions. In addition, the Project Applicant is required to prepare and submit to the City for approval of a Project-specific Storm Water Quality Management Plan ("SWQMP"; IS/MND *Technical Appendix H2*). The SWQMP must identify and implement an effective combination of erosion control and sediment control measures to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Thus, under long-term operating conditions, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c. Would the proposed 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?

Determination: Less-than-Significant Impact.

Impact Analysis

Refer to the analysis of Thresholds 4.7.a.(iii) and 4.7.a.(iv) for a discussion of impacts related to liquefaction/collapse and landslide hazards, respectively. As indicated in the analysis therein, impacts would be less than significant.

Lateral spread or flow are terms referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement, like water. All of the land within the Project site is relatively flat and there are no slopes on or adjacent to the Project site that may contribute to lateral spreading. Accordingly, no impact would occur due to lateral spreading.

Subsidence is the downward movement of the ground caused by the underlying soil conditions. Certain soils, such as clay soils are particularly vulnerable since they shrink and swell depending on their moisture content. Subsidence is an issue if buildings or structures sink which causes damage to the building or structure. As indicated in the Project's Geotechnical Report (*Technical Appendix E1*), subsidence on the order of 0.2 feet may occur with implementation of the proposed Project (NorCal Engineering, 2021, p. 11). However, the Geotechnical Report includes recommendations to remediate on-site soil conditions, including through the over-excavation and re-

compaction of earth materials below the proposed buildings in order to provide uniform bearing materials beneath the planned footings and slab. The Project would be conditioned to implement the recommendations of the Project's Geotechnical Report and/or with the recommendations of any geotechnical studies that may be required in association with future grading or building permits. Accordingly, impacts due to subsidence would be less than significant.

d. Would the proposed Project be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial direct or indirect risks to life or property?

Determination: Less-than-Significant Impact.

Impact Analysis

According to the Project's Geotechnical Report (*Technical Appendix E1*), when soils have an expansion index (EI) of 20 or more, special attention should be given to the project design and maintenance. However, the upper on-site soils are very low in expansion potential (EI 0-20), and thus do not require special grading or construction techniques. (NorCal, 2021, p. 16) Accordingly, the Project would not be located on expansive soil, as defined in Section 1803.5.3. of the California Building Code (2022), creating substantial direct or indirect risks to life or property, and impacts would be less than significant.

e. Would the proposed 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?

Determination: No Impact.

Impact Analysis

The Project does not propose the use of septic tanks or alternative waste water disposal systems. As previously described in subsection 3.1.2.G.3, as part of the Project domestic sewer infrastructure would be installed and connected to the existing SBMWD sewer conveyance and treatment system. The Project's sewer system would connect to existing sewer mains located within Arrowhead Avenue and Rialto Avenue. Accordingly, no impact associated with septic tanks or alternative waste water systems would occur with implementation of the proposed Project.

f. Would the proposed Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Determination: Less than Significant Impact with Mitigation Incorporated.

Impact Analysis

A Paleontological Assessment was prepared for the Project site by BFSA. This report is entitled, "Paleontological Assessment for the 119 South Arrowhead Avenue Project," is dated March 4, 2022, and is included as *Technical Appendix E2* to this MND (BFSA, 2022b). The Paleontological Assessment included a review of paleontological literature and fossil locality records for a previous project in the area; a review of the underlying geology; and recommendations to mitigate impacts to potential paleontological resources, if necessary. Refer to Sections II through IV of the Paleontological Assessment for a more detailed discussion of applicable regulations, site geology, and methodologies employed by BFSA as part of the assessment.

Paleontological resources are the remains of prehistoric life that have been preserved in geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat, for example. Fossils are considered a nonrenewable resource under State and local guidelines. (BFSA, 2022b, p. 6)

The literature review and collections and locality records search conducted by BFSA did not identify any previously recorded fossil localities from within the boundaries of the Project site, nor from within several miles of the Project site. The closest-known fossil localities are located in Fontana and Calimesa, according to San Bernardino County Museum (SBCM) records. Additionally, no paleontological resources or evidence indicating the presence of paleontological resources were identified as a result of the site survey conducted by BFSA. (BFSA, 2022b, p. 6) As such, there are no known paleontological resources within the Project site or surrounding areas.

The degree of paleontological sensitivity of any particular area is based on a number of factors, including the documented presence of fossiliferous resources on a site or in nearby areas, the presence of documented fossils within a particular geologic formation or lithostratigraphic unit, and whether or not the original depositional environment of the sediments is one that might have been conducive to the accumulation of organic remains that might have become fossilized over time. Holocene alluvium is generally considered to be geologically too young to contain significant nonrenewable paleontological resources (i.e., fossils) and is thus typically assigned a "Low" paleontological sensitivity. Pleistocene (over 11,700 years old) alluvial and alluvial fan deposits in the Inland Empire, however, often yield important terrestrial vertebrate fossils, such as extinct mammoths, mastodons, giant ground sloths, extinct species of horse, bison, camel, sabertoothed cats, and others. These Pleistocene sediments are thus accorded a "High" paleontological resource sensitivity. (BFSA, 2022b, pp. 6-7)

The Project site lies within the broad, fault-bounded alluvial valley of the Santa Ana River channel between the San Bernardino Mountains to the north and the San Timoteo Badlands to the south. The Project site is just east of Warm Creek, a tributary to the Santa Ana River. Stratigraphically, the Project site overlies late Holocene-aged young axial-channel deposits, Unit 4. These sedimentary deposits are characterized as fine to coarse-grained sands and pebbly sands that coarsen eastward. Active wash deposits of unconsolidated sand and gravel characterize the path of Warm Creek. (BFSA, 2022b, p. 4)

The Society of Vertebrate Paleontology has drafted guidelines that include four categories of paleontological sensitivity for geologic units (formations) that might be impacted by a proposed project, and includes the following categories: "High Potential"; "Undetermined Potential"; "Low Potential"; and "No Potential." Using these criteria, and based on the young geologic age of the sediments mapped at the Project and the lack of nearby significant fossil localities, the Holocene young axial-channel deposits can be considered to have a "Low" potential to yield significant paleontological resources. (BFSA, 2022b, p. 7)

Based on the existence of late Holocene young axial-channel deposits at the Project site and the lack of any known fossil specimens or fossil localities from within a several-mile radius encompassing the Project site, BFSA recommends that paleontological monitoring is not necessary during earth disturbance activities at the Project

site. However, a significant impact could occur in the unlikely event that fossils of any sort are discovered during grading and earthmoving activities. In the event that fossils are uncovered during grading and earthmoving activities, then Mitigation Measure MM GEO-1 would apply, which requires consultation with a professional paleontologist and specifies measures to be undertaken in the event that the discovery is determined by be significant by the Project paleontologist. Implementation of Mitigation Measure MM GEO-1 would ensure that the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and would reduce potential impacts to less-than-significant levels. (BFSA, 2022b, pp. 7-8)

Mitigation

MM GEO-1 Prior to grading permit issuance, the City of San Bernardino shall verify that the following applicable notes are included on the grading plans. Project contractors shall be required to ensure compliance with these notes and permit periodic inspection of the construction site by City of San Bernardino staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors.

1. *If paleontological resources are discovered during earth disturbance activities, the discovery shall be cordoned off with a 100-foot radius buffer so as to protect the discovery from further potential damage, and a county or city-qualified paleontologist shall be consulted to assess the discovery. If the discovery is determined to be significant by the paleontologist, a Mitigation Monitoring and Reporting Program (MMRP) shall be initiated, which shall include notification of appropriate personnel involved and monitoring of earth disturbance activities:*

    a. *Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources shall be performed by a qualified paleontologist or paleontological monitor. Monitoring shall be conducted full-time in areas of grading or excavation in undisturbed sedimentary deposits.*

    b. *Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery.*

    c. *Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place. On mass grading projects, discovered fossil sites shall be protected by flagging to prevent them from being overrun by earthmovers (scrapers) before salvage begins. Fossils shall be collected in a similar manner, with notes and photographs being taken before*

removing the fossils. Precise location of the site shall be determined with the use of handheld GPS units. If the site involves remains from a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew shall excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment may be solicited to help remove the jacket to a safe location.

d. *Isolated fossils shall be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place.*

e. *Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, as many as 20 to 40 five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment.*

f. *In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth.*

g. *In the laboratory, individual fossils shall be cleaned of extraneous matrix, any breaks shall be repaired, and the specimen, if needed, shall be stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).*

h. *Recovered specimens shall be prepared to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils.*

i. *Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., the San Bernardino County Museum) shall be conducted. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities. Prior to curation, the lead agency (e.g., the City of San Bernardino) shall be consulted on the repository/museum to receive the fossil material.*

j. A final report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to, and accepted by, the appropriate lead agency, shall signify satisfactory completion of the Project program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases?	☐	☐	☒	☐

The analysis in this Subsection is based on a Project-specific technical report prepared by Urban Crossroads, entitled, "S. Arrowhead Greenhouse Gas Analysis" (herein, "GHGA"), dated September 26, 2022, and included as *Technical Appendix F* to this MND (Urban Crossroads, 2023d). Please refer to Section 2 of the GHGA for detailed discussion of Global Climate Change (GCC), a discussion of greenhouse gases (GHGs) and their effects on GCC, GHG inventories, health effects of GHGs, effects of GCC in California, and applicable regulations related to GHGs, and refer to Section 3 of the GHGA for a detailed discussion of the methodology used to estimate the Project's GHG emissions.

a. Would the proposed Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Determination: Less-than-Significant Impact.

Impact Analysis

Climate Change Setting

Introduction to Global Climate Change and Greenhouse Gases

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere,

but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. (Urban Crossroads, 2023d, p. 8)

An individual project like the proposed Project evaluated herein cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. (Urban Crossroads, 2023d, p. 8)

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature. (Urban Crossroads, 2023d, p. 8)

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1 of the Project's GHGA (*Technical Appendix F*). For the purposes of the analysis of Project impacts due to GHGs, emissions of CO_2, CH_4, and N_2O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases. Table 2-1 of the Project's GHGA includes a description of GHGs, their sources, and associated health effects. (Urban Crossroads, 2023d, pp. 8-9)

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport those higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas. Exhibit 2-A of the Project's GHGA (*Technical Appendix F*) presents the potential impacts of global warming. (Urban Crossroads, 2023d, p. 14)

Project Greenhouse Gas Emissions Impact

Discussion on Establishment of Significance Thresholds

The City of San Bernardino has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The SCAQMD's adopted numerical screening threshold for industrial developments is 10,000 $MTCO_2e$ per year; however, the analysis herein provides a conservative evaluation of the Project's potential GHG impacts and uses the SCAQMD screening threshold of significance for residential and commercial land uses of 3,000 $MTCO_2e$ per. The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. (Urban Crossroads, 2023d, pp. 38-39)

Use of this threshold also is consistent with guidance provided in the CAPCOA CEQA and Climate Change handbook, as such the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook.

Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development. (Urban Crossroads, 2023d, p. 39)

A GHG significance threshold based on a 90% emission capture rate is appropriate to address the long-term adverse potential impacts associated with GHG emissions. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that SCAQMD estimates that these GHG emissions would account for <1% of future 2050 statewide GHG emissions target (85 $MMTCO_2e$ /yr). In addition, these small projects would be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. (Urban Crossroads, 2023d, p. 39)

California Emissions Estimator Model (CalEEMod)

In May 2022 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of the CalEEMod Version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources, and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1. and 3.2 to the Project's GHGA (*Technical Appendix F*). CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water. (Urban Crossroads, 2023d, p. 41)

Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions. The Project's AQIA (*Technical Appendix A1*) contains detailed information regarding Project construction activities. As discussed in the AQIA, construction-related emissions are expected from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. (Urban Crossroads, 2023d, p. 42)

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4-9, *Amortized Annual Construction Emissions*. Detailed construction model outputs are presented in Appendix 3.1 to the Project's GHGA (*Technical Appendix F*). (Urban Crossroads, 2023d, p. 43)

Table 4-9 Amortized Annual Construction Emissions

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e[6]
2023	567.00	0.03	0.03	0.38	578.00
2024	78.00	< 0.005	< 0.005	0.05	78.90
Total GHG Emissions	645.00	0.03	0.03	0.43	656.90
Amortized Construction Emissions	**21.50**	**0.00**	**0.00**	**0.01**	**21.90**

(Urban Crossroads, 2023d, Table 3-3)

Operational Emissions

Operational activities associated with the Project would result in emissions of CO_2, CH_4, and N_2O from the following primary sources: area source emissions; energy source emissions; mobile source emissions; on-site cargo handling equipment emissions; water supply, treatment, and distribution; solid waste; and refrigerants. Each is discussed below. (Urban Crossroads, 2023d, p. 44)

Area Source Emissions

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. (Urban Crossroads, 2023d, p. 44)

Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Based on data provided by the Project applicant, the proposed Project will not utilize natural gas. CalEEMod default parameters were used to calculate indirect emissions resulting from the use of electricity. (Urban Crossroads, 2023d, pp. 44-45)

Mobile Source Emissions

The Project's GHG emissions would derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the Project's Traffic Analysis ("TA"; *Technical Appendix J2*) were utilized in this analysis. (Urban Crossroads, 2023d, p. 45)

To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed land use. For the three proposed buildings, it is important to note that although the Project's TA (*Technical Appendix J2*) does not break down passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1 & LDT2), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. To account for emissions generated by passenger cars, the fleet mix listed in Table 3-4 of the Project's GHGA (*Technical Appendix F*) was utilized in this analysis. (Urban Crossroads, 2023d, p. 45)

To determine emissions from trucks for the proposed Project, the analysis incorporated the SCAQMD recommended truck trip length of 14.2 miles for 2-axle and 3-axle (LHDT[1], LHDT2[2], and MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the Project's TA (*Technical Appendix J2*). The trip length function for the manufacturing/business park building use has been conservatively calculated to 30.35 miles, with an assumption of 100% primary trips for the proposed Project. This trip length assumption is higher than the CalEEMod defaults for trucks. In order to be consistent with the Project's TA, trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided in the Project's TA. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT110 & LHDT2 11)/2-axle, Medium-Heavy-Duty Trucks (MHD)/3-axle, and Heavy-Heavy-Duty Trucks (HHD)/4+-axle. To account for emissions generated by trucks, the fleet mix shown in Table 3-5 of the Project's GHGA (*Technical Appendix F*) was utilized in this analysis. (Urban Crossroads, 2023d, pp. 45-46)

On-Site Cargo Handling Equipment Emissions

It is common for manufacturing/business park buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For the proposed Project, on-site modeled operational equipment includes up to one (1) 175 horsepower (hp), natural gas-powered tractors/loaders/backhoes operating at 4 hours a day for 365 days of the year. (Urban Crossroads, 2023d, p. 46)

Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used. (Urban Crossroads, 2023d, p. 46)

Solid Waste

Industrial land uses result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, pp. 46-47)

[1] Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.
[2] Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs

Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the building are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the US EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters. (Urban Crossroads, 2023d, p. 47)

Emissions Summary and Conclusion

The annual GHG emissions associated with the Project are summarized in Table 4-10, *Project GHG Emissions*. As shown in Table 4-10, construction and operation of the Project would generate a total of 2,881.29 $MTCO_2e$/yr. (Urban Crossroads, 2023d, p. 47)

As previously indicated, a numerical threshold for determining the significance of GHG emissions in the SCAB has not been established by the SCAQMD for Projects where it is not the lead agency. As an interim threshold based on guidance provided in the CAPCOA CEQA and Climate Change handbook, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development. The latest threshold developed by SCAQMD using this method is 3,000 $MTCO_2e$/yr for residential and commercial projects, which has conservatively been utilized herein as the threshold of significance in lieu of the SCAQMD recommended 10,000 $MTCO_2e$/yr for industrial projects. (Urban Crossroads, 2023d, pp. 47-48)

Table 4-10 Project GHG Emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years	21.50	1.00E-03	1.00E-03	1.43E-02	21.90
Mobile	2,334.00	0.15	0.25	3.39	2,415.00
Area	9.59	< 0.005	< 0.005	0.00	9.63
Energy	177.00	0.02	< 0.005	0.00	178.00
Water	74.90	1.74	0.04	0.00	131.00
Waste	22.40	2.24	0.00	0.00	78.40
Off-Road	0.00	0.00	0.00	0.00	47.37
Total CO_2e (All Sources)	**2,881.29**				

(Urban Crossroads, 2023d, Table 3-6)

As noted above and in Table 4-10, the Project would result in approximately 2,881.29 $MTCO_2e$/yr of GHG emissions. As such, the Project would not exceed the SCAQMD's recommended numeric threshold of 3,000

$MTCO_2e$/yr for residential and commercial projects, and would be well below the SCAQMD 10,000 $MTCO_2e$/yr screening threshold for industrial projects. Therefore, Project-related emissions would not have a potential significant direct or indirect impact on GHG and climate change, and impacts would be less than significant. (Urban Crossroads, 2023d, p. 48)

b. Would the proposed Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Determination: Less-than-Significant Impact.

Impact Analysis

Pursuant to Section 15604.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. Project consistency with SB 32, the CARB 2017 Scoping Plan, the CARB 2022 Scoping Plan, and SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal) are discussed below.

❑ Project Consistency with SB 32/CARB 2017 Scoping Plan

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 4-11, *2017 Scoping Plan Consistency Summary*, summarizes the Project's consistency with the 2017 Scoping Plan. As summarized, the Project would not conflict with any of the provisions of the 2017 Scoping Plan and in fact supports seven of the action categories. Any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030, consistent with SB 32. Accordingly, the Project would not conflict with or obstruct implementation of the 2017 Scoping Plan Update, and impacts would therefore be less than significant. (Urban Crossroads, 2023d, p. 48)

Table 4-11 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard (RPS) to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for Statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of Statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be designed and constructed to implement the energy efficiency measures for new manufacturing/business park developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct policies or strategies to establish annual targets for Statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of		Consistent. The Project would be designed and constructed to implement energy efficiency measures

Table 4-11 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRP.		acting to reduce electricity consumption. The Project includes energy efficient lighting and fixtures that meet the current Title 24 Standards. Further, the Project proposes contemporary manufacturing/ business park facilities that would incorporate energy efficient boilers, heaters, and air conditioning systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty electric vehicle 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes zero-emission		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.

Table 4-11 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
vehicles comprise 2.5% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming Statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Consistent. The Project would implement Transportation Demand Measures (TDMs) that would act to reduce VMT.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).
By 2019, adjust performance measures used to select and design transportation facilities		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.

Table 4-11 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, California Natural Resources Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Consistent. The Project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the State. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, California's Department of Resources Recycling and Recovery (CalRecycle), CDFA, SWRCB, Local Air Districts	Consistent. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the Short-Lived Climate Pollutants (SLCP) and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Consistent. The Project would implement waste reduction and recycling measures consistent with State and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLCP and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA,	Consistent. The Project site is zoned for "CH (Commercial Heavy)" uses, and the Project's manufacturing/business park buildings are fully consistent with the site's CH zoning classification. The Project does not propose land conversion. The Project

Table 4-11 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
	CARB	would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		Consistent. The Project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		Consistent. Where appropriate, the Project would incorporate wood or wood products. The Project would not obstruct or interfere with agency efforts to encourage use of wood and agricultural products to increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan.		Consistent. The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.	CARB	Consistent. The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA	Consistent. The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere with agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

(Urban Crossroads, 2023d, Table 3-7)

❑ Project Consistency with SB 32/CARB 2022 Scoping Plan

In December 2022, CARB released the Final 2022 Scoping Plan Update (2022 Scoping Plan), which identifies the State's strategies to reduce GHG emissions by 85% and achieve carbon neutrality by 2045. The 2022 Scoping Plan reflects an accelerated target of an 85% reduction in GHG emissions compared to 1990 levels by 2045. This third update relies on key programs in place, including the Cap-and-Trade Regulation and the Low Carbon Fuel Standard (LCFS), while stressing the need to increase their pace and scale.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, and the Low Carbon Fuel Standard. As such, the Project would not be inconsistent with the 2022 Scoping Plan, and impacts would be less than significant.

❑ Project Consistency with 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect So-Cal)

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles.

SCAG's *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*, also referred to as *Connect SoCal*, develops long-range regional transportation plans including a sustainable communities strategy and growth forecast components, regional transportation improvement programs, regional housing needs allocations and other plans for the region. The RTP/SCS provides objectives for meeting air pollution emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. The Subregional Sustainable Communities Strategies identifies the Project Site as being located in an area with a "Standard Suburban" land use pattern, which is defined as auto-oriented development with a minimal mix of land uses.

The *Goods Movement Technical Report* of *Connect SoCal* recognizes that the SCAG region is the premier trade gateway for the United States. *Connect SoCal* acknowledges that the SCAG region has witnessed continued growth for warehousing, distribution, cold storage and truck terminal facilities, with a majority of the growth for national and regional distribution facilities occurring in the Inland Empire. Through *Connect SoCal*, SCAG is working on various regional strategies to maintain the SCAG region as an important trade gateway while addressing regional transportation efficiency and environmental sustainability.

As indicated in Table 4-12, *Project Consistency with SCAG 2020-2045 RTP/SCS Core Visions*, the Project would not conflict with the adopted goals of Connect SoCal. SCAG intended that Connect SoCal ensure that the southern California region attains the per capita vehicle miles targets for passenger vehicles identified by CARB, as required by Senate Bill 375. As indicated in MND Subsection 4.17, Project impacts due to vehicle miles traveled (VMT) would be less than significant. The Project also would be consistent with Connect SoCal for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands by locating a proposed manufacturing/business park development in an area that is already developed with similar land uses. Therefore, impacts due to a conflict with the SCAG 2020 RTP/SCS would be less than significant.

Table 4-12 Project Consistency with SCAG 2020-2045 RTP/SCS Core Visions

RTP/SCS Goals	Goal Statement	Project Consistency Discussion
Connect SoCal		
1	Encourage regional economic prosperity and global competitiveness.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. It should be noted that the Project would improve the regional economy by creating a new manufacturing/business park facility.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	No conflict identified. The Project's TA (*Technical Appendix J2*) evaluates the Project's potential effects to LOS, and demonstrates that all study area facilities would operate at acceptable LOS under all study scenarios with the addition of Project traffic. The Project's design includes intersection and road improvements along the Project site's frontages with Arrowhead Avenue, Rialto Avenue, and South Sierra Way. Additionally, the Project would improve the accessibility of goods to the surrounding area by serving as a manufacturing/business park facility in the local and regional supply chain system.
3	Enhance the preservation, security, and resilience of the regional transportation system.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would have no adverse effect on such planning or maintenance efforts.
4	Increase person and goods movement and travel choices within the transportation system.	No conflict identified. The Project involves development of three manufacturing/business park buildings within an existing heavy commercial/industrial area, along designated truck routes, and in close proximity to the State highway system, which would avoid or shorten truck-trip lengths on other roadways. Sidewalks and bicycle lanes already exist along the Project's frontages with Arrowhead Avenue, Rialto Avenue, and South Sierra Way, and the Project design includes intersection and road improvements along these roadways that would benefit travelers, visitors, and pedestrians and bicyclists. As such, multiple travel choices are accommodated by the Project's design.
5	Reduce greenhouse gas emission and improve air quality.	No conflict identified. Air quality is addressed in MND Subsection 4.3, *Air Quality*, which demonstrates that Project-related air quality emissions during both construction and operation would be less than significant. Additionally, and as discussed in MND Subsection 4.8, *Greenhouse Gas Emissions*, the Project would not exceed the identified threshold of significance for GHGs of 3,000

Table 4-12 Project Consistency with SCAG 2020-2045 RTP/SCS Core Visions

RTP/SCS Goals	Goal Statement	Project Consistency Discussion
		$MTCO_2e$/yr, indicating the Project-related GHG impacts would be less than significant.
6	Support healthy and equitable communities.	No conflict identified. This policy pertains to health and equitable communities, and these issues are addressed through goals and policies outlined in the Safety Element of the City's General Plan. Relevant to the Project, the design of the proposed buildings would support the health of occupants and users by using non-toxic building materials and finishes per the California Building Code, and by using windows and design features to maximize natural light and ventilation. Additionally, and as concluded in MND Subsection 4.3, *Air Quality*, implementation of the Project: 1) would not exceed applicable SCAQMD localized criteria pollution emissions thresholds during construction and operation; 2) would not expose sensitive receptors to toxic air contaminants (e.g., DPM) from construction or long-term operations that exceed the applicable SCAQMD carcinogenic and non-carcinogenic risk thresholds; and 3) would not cause or contribute to the formation of a CO "hot spot."
7	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	No conflict identified. *Connect SoCal* indicates that since the adoption of the *2016 RTP/SCS*, there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. Manufacturing/ business park uses continues to be one of the most influential factors shaping goods movement. The Project involves the redevelopment of a property previously developed as a foundry (Hanford Foundry), with three manufacturing/business park buildings that would diversity the City of San Bernardino's economy and bring employment opportunities closer to the local workforce.
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No conflict identified. *Connect SoCal* also indicates that the advancement of automation is expected to have considerable impacts to regional businesses. Notably, manufacturing/business park uses, such as the buildings proposed as part of the Project, are increasingly integrating automation related to the transportation of goods to improve operational efficiencies in response to the surge in direct-to-consumer e-commerce. Continued developments and demonstrations of electric-powered and automated truck technologies will alter the goods movement environment with effects ranging from

Table 4-12 Project Consistency with SCAG 2020-2045 RTP/SCS Core Visions

RTP/SCS Goals	Goal Statement	Project Consistency Discussion
		efficiency to highway safety. The proposed Project's design includes accommodations for passenger vehicle EV charging stations and truck-charging infrastructure. As such, the Project's design would meet contemporary industry standards to support advancements in these and other transportation technologies.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No conflict identified. The Project is located in an area designated for heavy commercial and industrial uses and would not interfere with the City's ability to encourage the development of diverse housing types that are supported by multiple transportation options in other parts of the City, as appropriate. There is no housing located on the Project site nor proposed on the Project site, as the property previously was developed as a foundry (Hanford Foundry) and is designated for "Commercial Heavy (CH)" uses.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	No conflict identified. As disclosed in MND Subsection 4.4, *Biological Resources*, mitigation is applied to the Project to protect nesting birds, if nesting birds are present prior to construction. The Project site does not contain any sensitive habitat. Therefore, implementation of the Project would not interfere with City's ability to promote the conservation of natural and agricultural lands and the restoration of habitats. Additionally, the Project site does not include any land designated for agricultural uses.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

In order to evaluate the Project site's potential to contain hazardous materials or substances under existing conditions, two technical studies were prepared for the Project site by Hazard Management Consulting, Inc. (HMC). The first report is entitled, "Phase I Environmental Site Assessment, 119 South Arrowhead Avenue, San Bernardino, California 92408" (herein, "Phase I ESA"), is dated August 31, 2021, and is included as *Technical Appendix G1* to this MND (HMC, 2021a). The second report is entitled, "Phase II Site Investigation Report, 119 S. Arrowhead Avenue, San Bernardino, California" (herein, "Phase II ESA), is dated November 10, 2021, and is included as *Technical Appendix G2* to this MND (HMC, 2021b). In addition, a site-specific Soil Management Plan (SMP) approved by the California Department of Toxic Substances Control (DTSC) has been prepared to guide the management of soil during the grading effort at the Project site and after completion of the removal of contaminated soils (HMC, 2023). The SMP is entitled, "Soil Management Plan, 119 South Arrowhead Avenue," and is dated February 6, 2023.

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

b. Would the proposed 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?

Determination: Less than Significant Impact with Mitigation Incorporated.

Impact Analysis

The Project has the potential to create a significant hazard to the public or environment based on existing site conditions, construction of the proposed Project, and long-term operation. Each is discussed below.

Impact Analysis for Existing Site Conditions

According to the Project's Phase I ESA (*Technical Appendix G1*), the Project site was owned and operated by the Hanford Family from 1892 to 1986, and operated as a foundry beginning in 1906. The Project site formerly contained the Hanford Foundry Company and produced commercial pumps, cement, and tool castings with steel, stainless steel, and alloys. Other uses at the Project site included residential, a church, other manufacturing, fertilizer production, and a news agency (HMC, 2021a, p. 1).

Foundries are common sources of hazardous substance releases and the Project site has been investigated by the DTSC and evidence of releases of hazardous materials in the subsurface at the Project site were discovered. The DTSC granted the Project site a Conditional No Further Action (NFA) Determination in 2007 based on the investigation conducted. The NFA letter stated that the Project site "does not appear to pose a threat to human health or the environment with present use of the site" and that "no further action is necessary with respect to investigation and remediation of hazardous substances, provided that: (1) the use of the site does not change from commercial/industrial, and (2) the site is not used for any of the sensitive uses identified in the Land Use Covenant (LUC)." The conditions of the NFA were that a LUC be recorded on Title which restricted certain uses on site and a Soil Management Plan (SMP) be implemented at the Project site if soil were ever to be disturbed. The LUC also requires DTSC be notified prior to any subsurface work and such work is subject to a SMP. (HMC, 2021a, p. 19; HMC, 2021b, p. 1)

The historical use of the Project site as a foundry and closure subject to a LUC would be considered a Controlled Recognized Environmental Condition (CREC) and Historical Recognized Condition (HREC). The American Society for Testing and Materials (ASTM) defines a CREC as, "a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations)." The ASTM defines an HREC as, "a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A historical recognized environmental condition is not a recognized environmental condition." (HMC, 2021a, pp. 19-21)

A Site Characterization Report was previously prepared for the Project site by Shaw Environmental, Inc. dated August 11, 2006. The Shaw report documented the presence of elevated concentrations of metals, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPH) in shallow soil. At the time of Shaw's investigation, the VOCs were below risk-based screening levels. Since this time, these screening levels have become stricter. (HMC, 2021a, p. 11; HMC, 2021b, p. 1)

In order to evaluate the potential for residual contamination at the Project site, the Project's Phase II ESA (*Technical Appendix G2*) included sampling and testing of on-site soils. Soil samples were analyzed for VOCs, TPH, Title 22 Metals, PAHs, and PCBs as these compounds are identified as present in the top 0 to 10 feet of the Project site in the Shaw report and the LUC. The results of the Phase II ESA are as follows: (HMC, 2021b, pp. 6-7)

- Soil sampling confirms historic investigations, with VOCs, TPH, Title 22 Metals, PAHs, and PCBs confirmed to be present in shallow soils at the Project site.
- VOC detections in shallow soils are present below their recommended screening levels.
- TPH detections in shallow soils are present below their recommended screening levels.
- The presence of arsenic in shallow soils is consistent with the Shaw report and the LUC; although arsenic was detected above the industrial Preliminary Remedial Goal (PRG), the data presented tends to indicate that the levels detected on site may not be abnormally elevated and are within the range of naturally occurring arsenic within the Project vicinity (Shaw, 2006, p. 12-1).
- The presence of chromium in shallow soils is consistent with the Shaw report and the LUC; as reported by Shaw, none of the samples at the Project site contain chromium levels above the industrial PRG value (Shaw, 2006, pp. 12-1 and 12-2).
- The presence of total lead (TTLC) in shallow soils is consistent with the findings of the Shaw Report and LUC; however, exceedances of soluble lead (STLC) would require some soils to be managed as non-hazardous waste pursuant to the federal Resource Conservation and Recovery Act (RCRA) during future soil management activities.
- The presence of mercury in shallow soils is consistent with the Shaw report and LUC; as reported by Shaw, mercury levels in on-site soils are below any applicable PRG value (Shaw, 2006, p. 12-2).
- The presence of PCB-1260 in shallow soils is consistent with the Shaw report and LUC, which found that PCB-1260 concentrations were detected above the California industrial PRG of 0.74 mg/kg in three samples, likely due to past railroad activities or scrap material dumped in these areas (Shaw, 2006, p. 12-2).
- The presence of PAHs in shallow soils is consistent with the findings of the Shaw report and LUC, which reported that four samples at the Project site contained various PAHs above industrial PRG levels (Shaw, 2006, p. 9-4).
- Three (3) constituents (1,1-DCA, 1,2-DCA, and PCE) were detected in soil vapor at locations A3, G1, G3, and H2 at concentrations that exceeded screening levels. The concentrations reported are above conservative vapor intrusion screening levels and suggest that some form of vapor mitigation measure, like a vapor barrier may be necessary for future buildings at the Project site.

Based on the existing conditions at the Project site, there is a potential for contaminated soils on site to present a hazard to the public or the environment during site grading and ground-disturbing activities. Additionally, soil vapor intrusion has the potential to adversely affect future occupants of the proposed buildings. Impacts would be significant prior to mitigation. Mitigation Measure HM-1 requires implementation of the approved SMP under the oversight of the DTSC, which would require appropriate remediation of on-site soils in accordance with all applicable federal, State, and local requirements. Remediation activities would include the over excavation of contaminated soils on site, export and disposal of contaminated soils at an off-site location in Sunshine, Arizona, and air and dust monitoring during grading. Mitigation Measure HM-2 requires the design and installation of a vapor mitigation system beneath each of the proposed buildings in order to attenuate the presence of VOCs within soil gas. Implementation of the required mitigation would reduce potential impacts due to existing site contamination to below a level of significance.

Impact Analysis for Project Construction Activities

During grading, construction, and soil remediation activities, heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during construction of the Project. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, DTSC, SCAQMD, Santa Ana RWQCB, and/or the San Bernardino County Environmental Health Services (EHS). Because compliance with these regulatory requirements by construction contractors is mandatory, impacts due to hazardous materials used, transported, and/or stored during construction would be less than significant.

Impact Analysis for Long-Term Operational Activities

The Project Applicant is proposing to develop the Project site with three manufacturing/business park buildings. The future occupant(s) of the Project's proposed buildings are unknown at the time of this assessment; however, allowable occupant types would be governed by the site's existing Development Code zoning classification of "CH (Commercial Heavy)."

Although unlikely, it is possible that hazardous materials could be used during the course of a future occupant's daily operations. Uses that might use hazardous materials would be subject to standard San Bernardino County EHS policies and permitting procedures. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Regulations also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the Project site and that handles hazardous materials (as defined in § 25500 of California Health and Safety Code, Division 20, Chapter 6.95) would require permits from the San Bernardino County EHS in order to

register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the San Bernardino Fire District (SBFD) and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Thus, impacts would be less than significant and mitigation is not required.

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

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site is located approximately 0.2-mile west of the H. Frank Dominguez Elementary School (Google Earth, n.d.). As described above under the analysis for Thresholds 4.9.a. and b., the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that would preclude substantial public safety hazards. These regulations include requirements for the preparation of a HMBEP (if required by law) to the Superintendent's Office and Facilities and Operations office of the San Bernardino City Unified School District (SBCUSD). Additionally, during Project construction, haul trucks for the export of contaminated soils from the Project site would be routed north along Arrowhead Avenue and west on 2nd Street to I-215, and none of the haul trucks would pass by the H. Frank Dominguez Elementary School. Accordingly, there would be no potential for existing or proposed schools to be exposed to substantial safety hazards associated with emission, handling, or the routine transport of hazardous substances or materials to-and-from the Project site and impacts would be less than significant.

Refer to Subsection 4.3, *Air Quality*, for analysis pertaining to human health risks associated with air pollutant emissions associated with the Project, including risks to the maximally exposed school child located within one-quarter mile from the Project site. As concluded in Subsection 4.3, the Project's toxic air contaminant emissions (and their associated health risks) would be less than significant.

d. Would the proposed Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project's Phase I ESA (*Technical Appendix G1*) included a review of available records from EDR, and environmental records search firm, as well as records from the San Bernardino County Fire Protection District, California State Water Resources Control Board, Sanborn Fire Insurance Maps, and building permits, and the results of the records search did not identify recognized environmental conditions on site or in off-site areas that could affect the Project site. Additionally, based on a review of the California Environmental Protection Agency (CEPA) Cortese List, the Project site is not identified as containing any hazardous materials pursuant to Government Code Section 65962.5. Accordingly, the Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and the Project site's existing conditions would not create a significant hazard to the public or the environment. Impacts 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?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site is located approximately 1.9 miles northwest of the nearest runway at the San Bernardino International Airport (SBIA) (Google Earth, n.d.). According to mapping information available from the SBIA, the Project site is located well outside of the 65 dBA CNEL contour for the SBIA, indicating that the Project site is not exposed to excessive airport-related noise (SBIA, 2010, Exhibit 4H). The arrival and departure paths for the SBIA's runways do not extend over the Project Site. Fixed wing and helicopter aircraft arrive from the northeast and southwest and depart to the southwest. Therefore, there is no reasonable potential for the Project to result in significant safety hazards or noise exposure for people working or visiting on and around the Project Site, and impacts would be less than significant.

f. Would the proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Determination: Less-than-Significant Impact.

Impact Analysis

Access to the Project site is proposed from Arrowhead Avenue, Rialto Avenue, and Sierra Way, which are improved roadways. The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles via Arrowhead Avenue, Rialto Avenue, Sierra Way, and connecting roadways as required by the City. Furthermore, the Project would not result in a substantial alteration to the design or capacity of any public road that would impair or interfere with the implementation of evacuation

procedures. Because the Project would not interfere with an adopted emergency response or evacuation plan, impacts would be less than significant.

g. Would the proposed Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Determination: No Impact.

Impact Analysis

The Project site is located in a fully urbanized portion of the City of San Bernardino. According to Figure S-9 (Fire Hazard Areas) of the City's General Plan, the Project site is located well outside of areas mapped as having "Extreme" or "Moderate" fire hazards, with the nearest areas mapped as being subject to fire hazards occurring approximately 3.5 miles northwest of the Project site. Accordingly, the Project site is not subject to wildland fire hazards, and the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impact would occur.

Mitigation Measures

MM HM-1 Prior to grading permit issuance, the City of San Bernardino shall condition the Project to require compliance with the Project's Soil Management Plan (SMP) (*Technical Appendix G3* to the Project's Mitigated Negative Declaration [MND]) which was prepared by Hazard Management Consulting (HMC), dated February 6, 2023, and approved by the California Department of Toxic Substances Control (DTSC) on February 13, 2023. The condition of approval also shall require the Project Applicant to provide appropriate notification to the Department of Toxic Substances Control (DTSC) prior to commencement of ground-disturbing activities. As part of soil remediation efforts on site, and prior to the start of grading activities, all soil with known commercial human health impacts found within the grading and re-compaction zone exceeding the action level concentrations identified in Table 1 of the SMP shall be removed and disposed of at an appropriate offsite facility in accordance with the property's Land Use Covenant (LUC). Grading operations shall be monitored by an Environmental Field Coordinator (EFC) visually and with the appropriate monitoring equipment (e.g. a organic vapor analyzer [OVA] or a handheld x-ray fluorescence [XRF]) to assess potential for and conduct testing of suspected contaminated soils above the action level concentrations identified in Table 2 of the SMP. The procedures identified in the SMP under "Unanticipated Environmental Conditions" shall be followed if unanticipated environmental conditions are encountered, including unusual odors, sustained elevated OVA readings (greater than 25 ppm), elevated XRF reading (greater than 5 times STLC screening level for the metals of concern), pH less than 2, unusual staining or discoloration, or other characteristics judged by the EFC to be not representative of previously assessed Site conditions. If elevated concentrations of lead are encountered, that soil shall be segregated and analyzed for the soluble fraction to assess whether that soil can be used as fill or must be removed from the Project site. As part of the grading efforts, South Coast Air Quality Management District (SCAQMD) Rules 1166 (VOCs) and 1466 (Metals) also shall apply. A final report shall be prepared which shall provide a summary of the work conducted, results of confirmation sampling and will contain copies of all daily field logs including all OVA and XRF monitoring results, laboratory results, and manifests used to dispose of soil from the Project site. Prior to final grading inspection, the Project Applicant shall provide evidence to the

City of San Bernardino demonstrating that these requirements have been completed to the satisfaction of the City of San Bernardino, the County of San Bernardino, and DTSC.

MM HM-2 Prior to building permit issuance, the City of San Bernardino shall condition the Project to require the design and installation of a vapor mitigation system beneath each of the proposed buildings in order to attenuate the presence of VOCs within soil gas as required by SCAQMD Rule 1166 (VOCs). The required vapor mitigation system shall be depicted on the building plans and shall be in place prior to issuance of occupancy permits for each of the proposed buildings.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
e. 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 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?	☐	☐	☒	☐

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
f. 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 impede or redirect flood flows?	☐	☐	☒	☐
g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Two Project-specific technical reports were prepared by Thienes Engineering, Inc. ("Thienes") to evaluate the Project's potential impacts to hydrology and water quality. The first report addresses hydrology and drainage and is entitled, "Preliminary Hydrology Calculations for San Bernardino Gateway Business Park," is dated October 5, 2022, and is included as *Technical Appendix H1* to this MND (Thienes, 2022a). The second report addresses water quality, and is entitled, "Water Quality Management Plan (WQMP) for San Bernardino Gateway Business Park," is dated October 14, 2022, and is included as *Technical Appendix H2* to this MND (Thienes, 2022b).

a. Would the proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Determination: Less-than-Significant Impact.

Impact Analysis

The California Porter-Cologne Water Quality Control Act (§ 13000 ["Water Quality"] et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act [CWA]) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Development within the Santa Ana RWQCB region is subject to the RWQCB's 2019 Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). The RWQCB's 2019 Basin Plan is herein incorporated by reference and is available for public review at the Santa Ana RWQCB office located at 3737 Main Street, Suite 500, Riverside, CA 92501-3348. (RWQCB, 2019)

The CWA requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards are placed on a list of impaired waters pursuant to the requirements of Section 303(d) of the CWA. The Project site resides within the Santa Ana Watershed. Based on the Project's WQMP (*Technical Appendix H2*), receiving waters for the property's drainage include City Creek, Warm Creek, Santa Ana River (Reach 5), Santa Ana River (Reach 4), Santa Ana River (Reach 3), Prado Dam, Santa Ana River (Reach 2), Santa Ana River (Reach 1), and the Pacific Ocean.

Receiving waters listed on the Section 303(d) list include Warm Creek, Santa Ana River (Reach 4), Santa Ana River (Reach 3), and Prado Dam. Warm Creek and Santa Ana River (Reach 4) are listed as being impaired by indicator bacteria; Santa Ana River (Reach 3) is listed as being impaired by copper, indicator bacteria, and lead; and the Prado Dam is listed as being impaired by pH. City Creek, Santa Ana River (Reach 5), Santa Ana River (Reach 2), Santa Ana River (Reach 1), and the Pacific Ocean are not listed as being impaired. (Thienes, 2022b, p. 3-3)

A specific provision of the CWA applicable to the proposed Project is CWA Section 402, which authorizes the National Pollutant Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one acre or larger to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit.

Provided below is a discussion of the Project's potential to result in violations of water quality standards or waste discharge requirements during both construction and long-term operation.

Construction-Related Water Quality Impacts

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

Pursuant to the requirements of the Santa Ana RWQCB and the City of San Bernardino, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. In addition, the Project would be required to comply with the RWQCB's Water Quality Control Plan for the Santa Ana River Basin ("Basin Plan"). Compliance with the NPDES permit and the Basin Plan involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, with mandatory adherence to the future required SWPPP, water quality impacts associated with construction activities would be less than significant and no mitigation measures would be required.

Operational Water Quality Impacts

As noted above, receiving waters for the property's drainage are City Creek, Warm Creek, Santa Ana River (Reach 5), Santa Ana River (Reach 4), Santa Ana River (Reach 3), Prado Dam, Santa Ana River (Reach 2), Santa Ana River (Reach 1), and the Pacific Ocean. Warm Creek and Santa Ana River (Reach 4) are listed as being impaired by indicator bacteria; Santa Ana River (Reach 3) is listed as being impaired by copper, indicator bacteria, and lead; and the Prado Dam is listed as being impaired by pH. (Thienes, 2022b, p. 3-3) According to the Project's Water Quality Management Plan (*Technical Appendix H2*), the Project's pollutants of concern include pathogens

(bacterial/virus), phosphorous, nitrogen, sediment/total suspended solids, metals, oils/grease, trash/debris, pesticides/herbicides, organic compounds, and oxygen demanding compounds (Thienes, 2022bp. 2-2). To meet NPDES requirements, the Project's proposed storm drain system is designed to route first flush runoff to catch basins located throughout the Project site, which would be diverted to a proposed underground solid 96-inch Corrugated Metal Pipe (CMP) system and filtered through a Modular Wetlands System (MWS) to provide water quality treatment prior to discharge from the Project site. The proposed MWS would be effective in reducing pollutants of concern in runoff leaving the Project site. As such, runoff from the Project site would not contribute substantially to existing downstream impairments and the Project would not violate any water quality standards or waste discharge requirements.

Furthermore, the Project would be required to implement its WQMP, pursuant to the requirements of the applicable NPDES permit. The WQMP is a post-construction management program that ensures the on-going protection of the watershed basin by requiring structural and programmatic controls. The Project's Preliminary WQMP is included as *Technical Appendix H2*. The Preliminary WQMP identifies structural controls (including storm drain system stenciling, appropriate design of trash and waste storage areas, efficient irrigation systems, and providing landscaping areas 1-2 inches below impervious surfaces) and non-structural source control measures (including property owner education, activity restrictions, landscape management BMPs, BMP maintenance, etc.). The structural and non-structural source control measures would minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the Project does not violate any water quality standards or waste discharge requirements during long-term operation.

Conclusion

Based on the preceding analysis, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

b. Would the proposed Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site does not contain any existing groundwater wells, and no groundwater wells are proposed as part of the Project. The Project would be served with potable water by the SBMWD. As such, the Project would not directly decrease groundwater supplies.

According to the 2020 San Bernardino Valley Regional Urban Water Management Plan (RUWMP), which addresses urban water management for the Project region (including the SBMWD service area), approximately 60% of the water supplies within the RUWMP area are obtained from groundwater sources (SBVMWD, 2021, p. 3-18). As documented by the RUWMP, the groundwater basins with in the RUWMP area are among the most rigorously managed in the State. Planning and management efforts evaluating needs and supplies have been established for most of the basins within the watershed through the next 20 to 40 years. Groundwater extractions and conditions

are monitored and tracked by the Western-San Bernardino Watermaster and the Basin Technical Advisory Committee. (SBVMWD, 2021, p. 3-18)

The RUWMP forecasts water demands and supplies under normal, single-dry, and multiple-dry year conditions; assesses supply reliability; and describes methods of reducing demands under potential water shortages. The RUWMP's estimate of projected water demand is based, in part, on the General Plans of the various jurisdictions within the San Bernardino Valley Municipal Water District (SBVMWD) service area. The RUWMP anticipated that the Project site would be developed in a manner consistent with the Project site's General Plan land use designation of "Commercial Heavy (CH)." The Project's proposed manufacturing/business park are fully consistent with the site's CH land use designation. Thus, the Project would result in the same demand for water resources as was anticipated by the RUWMP. As shown in Table 4-13, *SBVMWD Multiple Dry Years Supply and Demand Comparison (AF)*, the RUWMP estimates that the SBVMWD would have excess supplies during multiple dry year conditions ranging from 63,178 acre-feet (AF) in 2040 to 85,562 AF in 2020. As such, the Project's demand for potable water would not exceed the projected excess supplies through year 2040; therefore, the Project would not result in a substantial decrease in groundwater supplies, and impacts would be less than significant.

Table 4-13 SBVMWD Multiple Dry Years Supply and Demand Comparison (AF)

Year	Totals	2020	2025	2030	2035	2040
First Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	251,247	262,042	272,882	284,495	293,105
	Difference (Supply minus Demand)	76,196	72,992	69,345	64,960	63,178
Second Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	247,360	257,774	268,112	279,205	287,450
	Difference (Supply minus Demand)	80,083	77,260	74,115	70,250	68,833
Third Year	Supply Totals	327,444	335,034	342,227	349,455	356,283
	Demand Totals	241,881	251,870	261,662	272,191	280,072
	Difference (Supply minus Demand)	85,562	83,163	80,564	77,264	76,211

(SBVMWD, 2021, Table 4-4)

The Project site overlays the San Bernardino Basin Area (SBBA), which was defined by, and adjudicated in gross, by the Western-San Bernardino Judgment (Western Judgment) in 1969. The SBBA encompasses the Bunker Hills sub basin (Department of Water Resources [DWR] Number 8.02-06) and also includes a small portion of the Yucaipa Basin (8-02.07) and Rialto-Colton Basin (8-02.04). The Project site occurs within the Bunker Hills Basin portion of the SBBA. The Western Judgment established the natural safe yield of the SBBA to be a total of 232,100 AFY for both surface water diversions and groundwater extractions. The Western-San Bernardino Watermaster provides an annual accounting of annual extractions and a comparison to the safe yield. If the cumulative extractions are less than the cumulative safe yield, there is a groundwater "credit" in the basin. In years when cumulative extractions are greater than their allocation, a "debit" is given. Recharge is also required to offset the export of water outside the SBBA in excess of the amount recorded during the base period (1959-1963). (SBVMWD, 2021, pp. 3-20 and 3-21)

According to mapping information available from the Santa Ana Watershed Project Authority (SAWPA), there are no groundwater recharge areas on or adjacent to the Project site. The nearest identified groundwater recharge basin occurs approximately 2.9 miles northeast of the Project site. (SAWPA, n.d.) With development of the Project as proposed, a majority of the Project site would consist of impervious surfaces, which would in turn reduce the amount of direct infiltration of runoff into the ground. However, all runoff from the Project site under existing conditions is conveyed to existing storm drainage facilities in the area, which ultimately convey runoff to natural drainage channels that allow for infiltration of water into the groundwater table. With implementation of the proposed Project, the site would continue to drain to existing storm drainage facilities within roadways abutting the Project site. The total amount of runoff from the Project site would not change with implementation of the proposed Project.

Based on the foregoing analysis, the proposed Project would not interfere substantially with groundwater recharge, and there would be no net deficit in aquifer water volumes or groundwater table levels as a result of the Project. Impacts would be less than significant.

c. Would the proposed 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 result in substantial erosion or siltation on- or off-site?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project site was previously developed as a foundry (Hanford Foundry), and the property has been subject to prior grading operations. As previously indicated in MND subsection 3.1.2.B and as shown on MND Figure 3-4, grading activities associated with the Project would be conducted in a manner that approximates the site's existing topographic conditions. Under existing conditions, runoff from the Project site is conveyed to existing catch basins within Sierra Way and Arrowhead Avenue. As previously shown on MND Figure 3-9, with build out of the proposed Project, runoff from the Project site would continue to be conveyed to existing catch basins within Sierra Way and Arrowhead Avenue. As such, the Project would not result in a substantial alteration of the existing drainage pattern of the site or area. Additionally, no wetlands or jurisdictional resources, including streams and rivers, occur within areas proposed to be impacted by the Project.

The analysis of Threshold 4.10.a demonstrates that construction activities associated with the Project would not result in water quality impacts, including impacts related to erosion or siltation. Specifically, the Project Applicant would be required to obtain a NPDES Municipal Stormwater Permit for construction activities. Compliance with the NPDES permit involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP is required to specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern (including sediments) are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Mandatory compliance with the SWPPP would ensure that Project construction activities do not result in substantial erosion or siltation on- or off-site. Thus, construction activities associated with the Project would not 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 result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

With implementation of the Project, a majority of the Project site would consist of predominately impermeable paved surfaces and building roofs. The landscaping surrounding the buildings would be mostly permeable with some impermeable concrete walkways. As such, the risk of erosion or sedimentation with build out of the proposed Project would be minimal, and would be reduced as compared to existing conditions. Additionally, the Project's Hydrology Study (*Technical Appendix H1*) demonstrates that with implementation of the Project's proposed drainage system, the peak flows from the Project site would not increase in comparison to existing conditions, thereby demonstrating that the Project would not result in an increase in erosion or siltation hazards downstream. Thus, under long-term operating conditions the Project would not 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 result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

d. Would the proposed 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Determination: Less-than-Significant Impact.

Impact Analysis

Refer to the discussion and analysis of Threshold 4.10.c, which demonstrates that the Project would not substantially alter the existing drainage pattern of the site or area. The Project's proposed drainage system has been designed to preclude the potential for flood hazards on site. Additionally, with implementation of the proposed Project, the peak flows from the site would not increase compared to existing conditions, thereby indicating that Project runoff would not cause or contribute to increased flood hazards downstream (Thienes, 2022a). Therefore, the proposed Project would not 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, and impacts would be less than significant.

e. Would the proposed 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 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?

Determination: Less-than-Significant Impact.

Impact Analysis

Refer to the discussion and analysis of Threshold 4.10.c, which demonstrates that the Project would not substantially alter the existing drainage pattern of the site or area. Additionally, and as indicated in the Project's Hydrology Study (*Technical Appendix H1*), with implementation of the Project the peak runoff from the Project site would not increase relative to existing conditions (Thienes, 2022a). Because existing drainage facilities in the local area are sized to accommodate drainage from the Project site under existing conditions, it can be concluded

that runoff following implementation of the proposed Project would not exceed the capacity of any existing or planned stormwater drainage systems. Impacts would be less than significant.

f. Would the proposed 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 impede or redirect flood flows?

Determination: Less-than-Significant Impact.

Impact Analysis

Refer to the discussion and analysis of Threshold 4.10.c, which demonstrates that the Project would not substantially alter the existing drainage pattern of the site or area. According to mapping information available from the Federal Emergency Management Agency (FEMA), the Project site is mapped as being located in Zone X (unshaded), which encompasses "areas determined to be outside the 0.2% annual chance floodplain" (FEMA, 2016) As such, development on the Project site as proposed would not impede or redirect flood flows. Furthermore, and as indicated in the Project's Hydrology Study (*Technical Appendix H1*), with implementation of the Project the peak runoff from the Project site would not increase relative to existing conditions, indicating that the Project would not cause or contribute to redirection or impediments of flood flows offsite (Thienes, 2022a). Accordingly, the Project would not 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 impede or redirect flood flows, and impacts would be less than significant.

g. Would the proposed Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Determination: No Impact.

Impact Analysis

As indicated under the analysis of Threshold 4.10.f, the Project site is mapped as being located in Zone X (unshaded), which encompasses "areas determined to be outside the 0.2% annual chance floodplain" (FEMA, 2016). As such, the Project would not be located in a flood hazard area and would not be subject to inundation associated with flood events. The Project site is located approximately 48.4 miles northeast of the Pacific Ocean, indicating that there is no potential for the Project site to be inundated due to tsunamis. Additionally, there are no large bodies of water within the Project vicinity capable of subjecting the site to inundation associated with seiches. (Google Earth, n.d.) Accordingly, the Project would not risk release of pollutants due to project inundation due to flood hazards, tsunamis, or seiches, and no impact would occur.

h. Would the proposed Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Determination: Less-than-Significant Impact.

Impact Analysis

The 2014 Sustainable Groundwater Management Act (SGMA) requires local public agencies and Groundwater Sustainability Agencies (GSAs) in "high-" and "medium"-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. The California Department of Water Resources (DWR) currently

categorizes the Bunker Hill groundwater basin, which underlies the Project site, as "very low" priority (DWR, n.d.). Further, Section 10720.8(a) of the SGMA exempts adjudicated basins from the SGMA's requirement to prepare a GSP; the Bunker Hills-A groundwater basin been adjudicated (as also discussed under the analysis of Threshold 4.10.b. Therefore, preparation of a GSP is not required and the Bunker Hill-A basin is not subject to the requirements of the SGMA. As such, the Project has no potential to conflict with a sustainable groundwater management plan, and no impact would occur.

The California Porter-Cologne Water Quality Control Act (§ 13000 ("Water Quality") et seq., of the California Water Code), and the Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act) require that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana RWQCB. Water quality information for the Santa Ana River watershed is contained in the Santa Ana Basin Plan, as most recently updated in June 2019 (RWQCB, 2019).

The Basin Plan describes actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards. The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's groundwater and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. The RWQCB ensures compliance with the Santa Ana Basin Plan through its issuance of NPDES Permits, issuance of Waste Discharge Requirements (WDR), and Water Quality Certifications pursuant to Section 401 of the CWA. As discussed under Threshold 4.10.a, with adherence to State and local water quality regulations, the potential for the Project to generate pollutants and impact water quality during construction and operation would be less than significant. Accordingly, the Project would not degrade water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the Project would result in less-than-significant water quality impacts that could conflict with the Santa Ana Basin Plan.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Would the proposed Project physically divide an established community?

Determination: No Impact.

Impact Analysis

As previously depicted on MND Figure 2-3 and Figure 2-6, under existing conditions the Project site abuts Arrowhead Avenue to the west, Rialto Avenue to the north, and Sierra Way to the east, with the existing Metrolink railroad line and concrete drainage channel occurring immediately south of the Project's southern boundary. The only residential uses that occur in the Project area are located north, northeast, east, and south of the Project site on the opposite side of public streets or the existing railroad line, and the Project would maintain existing sidewalk connections along the Project's frontages with Arrowhead Avenue, Rialto Avenue, and Sierra Way. Thus, the Project would not physically divide an established community, and no impact would occur.

b. Would the proposed 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?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project has the potential to conflict with the City of San Bernardino General Plan, Zoning Code, and the provisions of SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal).

Project Consistency with City of San Bernardino General Plan

Although the City of San Bernardino is currently in the process of updating its General Plan (referred to as "San Bernardino 2050"), the updated General Plan is not expected to be approved until at least 2023. As such, the analysis herein is based on the City's adopted General Plan. Under existing conditions, the Project site is designated by the City of San Bernardino's adopted General Plan for "Commercial Heavy (CH)" and is zoned for "CH (Commercial Heavy)" land uses. The Project's proposed manufacturing/business park are fully consistent with the site's existing General Plan land use designation and zoning classification. As demonstrated throughout this MND, the Project would not conflict with any applicable goals, objectives, and policies of the City of San Bernardo's adopted General Plan or the City of San Bernardino Municipal Code.

Project Consistency with City of San Bernardino Zoning Code

The Project site's underlying zoning classification of "CH (Commercial Heavy)" is intended to accommodate automobile and truck sales and repair facilities, lumberyards, and related hardware sales, plant nurseries, light industrial manufacturing and storage facilities, and similar uses requiring extensive outdoor or indoor space for their sales, service, and-or storage, excluding neighborhood commercial uses. As indicated in Table 06.01 (Commercial Zones List of Permitted, Development Permitted and Conditionally Permitted Uses), "Assembling, Processing Facilities" are considered an allowed use in the CH zone with approval of a Development Permit. These uses include establishments, which perform the assembling, cleaning, manufacturing, processing, repairing or testing of products and welding and excluding explosives, conducted entirely within an enclosed structure. The Project's proposed manufacturing/business park uses are fully consistent with the range of land uses anticipated within the CH zone, and the Project Applicant is proposing DP-D22-04 as required for "Assembling, Processing Facilities" uses within the CH zone. In addition, the Project would comply with the following Development Standards specified in Section 19.06.030 of the City's Zoning Code:

- *Requirement: All indoor uses shall be conducted within a completely enclosed structure. Limited outside uses (e.g. patio dining areas and nursery sales limited to plants and trees) or permanent outdoor sales and display areas, for major tenants (15,000 sq. ft. or greater) shall be approved with a Development Permit. Temporary outdoor sales and displays are permitted pursuant to Chapter 5.22 of the Municipal Code. (Section 19.06.0.30(1)(B)(1))*

Project Consistency: All uses anticipated with the Project's proposed buildings would be conducted in completely enclosed structures, with limited outside uses. No outdoor sales or display areas are anticipated in association with the Project's proposed buildings.

- *Requirement: Outside storage, which shall be limited to within cargo containers only, shall be confined to the rear of the principal structure(s) or the rear two- thirds of the site, whichever is the more restrictive, and screened from public view from any adjoining properties and public rights-of-way by appropriate walls, fencing and landscaping and shall be approved with a Development Permit. No storage shall occur on any vacant parcel. Building materials for use on the same premises may be stored on the parcel during the time that a valid building permit is in effect for construction. (Section 19.06.0.30(1)(B)(2))*

Project Consistency: The Project's proposed manufacturing/business park buildings would not be associated with the outside storage of goods or products, and the Project would be conditioned by the City to require that any outside storage within cargo containers must be confined to the rear of the principal structure(s) or the rear two-thirds of the site, whichever is the more restrictive. The Project incorporates walls and landscaping to provide a visual buffer from surrounding land uses.

- *Requirement: Every parcel with a structure shall have a trash receptacle on the premises. The trash receptacle shall comply with adopted Public Works Department standards and be of sufficient size to accommodate the trash generated. The receptacle(s) shall be screened from public view on at least three sides by a solid wall six feet in height and on the fourth side by a solid gate not less than five feet in height. The gate shall be maintained in working order and shall remain closed except when in use. The wall and gate shall be architecturally compatible with the surrounding structures. (Section 19.06.0.30(1)(B)(3))*

Project Consistency: The locations of trash receptacles are depicted on the DP-D22-04 site plan and demonstrates consistency with these requirements.

- *Requirement: All roof-mounted air conditioning or heating equipment, vents or ducts shall not be visible from any abutting lot, or any public street or right-of-way. This shall be accomplished through the extension of the main structure or roof or screened in a manner which is architecturally integrated with the main structure(s). (Section 19.06.0.30(1)(B)(4))*

Project Consistency: The City of San Bernardino will review future building permit applications for consistency with these requirements, thereby ensuring all roof-mounted equipment would be shielded from public view.

- *Requirement: Elevations of all structures shall be architecturally treated to ensure compatibility with high quality neighboring structures. (Section 19.06.0.30(1)(B)(5))*

Project Consistency: The Project's DP-D22-04 application materials include architectural elevations that demonstrate that the future buildings would be compatible in quality with neighboring structures.

- *Requirement: An intensity bonus of up to 12 square feet for each 1 square foot of permanent space for properly designed and administered day care facilities may be approved by the review authority. (Section 19.06.0.30(1)(B)(6))*

Project Consistency: No day care uses are proposed as part of the Project, and thus this provision of the Zoning Code is not applicable to the proposed Project.

- *Requirement: Compliance with Commercial Zones Development Standards (as set forth in Table 06.02 of the City's Zoning Code).*

Project Consistency: As part of its review of proposed SUB22-01 and D/ERC No. 22-04 (DP-D22-04), City of San Bernardino staff reviewed the proposed Project for conformance with the development standards listed in Table 06.02 of the City's Zoning Code, and determined that the Project would comply with all provisions of Table 06.02, including provisions related to net lot area, setbacks, lot coverage, and structure height.

- *Requirement: Compliance with Specific Standards for Commercial Zones (as set forth in Section 19.06.0.30(2) of the City's Zoning Code).*

Project Consistency: The Project would not include any of the uses regulated by Section 19.06.0.30(2) of the City's Zoning Code, such as adult-oriented businesses, alcoholic beverage sales, no automobile sales/dismantling, commercial cannabis, convenience stores, day care centers, drive-thru restaurants, indoor retail concession malls, microbreweries/wineries, mini-malls, mini-storage, mixed-uses (commercial/ residential/office), mobile vendors, multi-family housing, neighborhood grocery stores, recycling facilities, service stations, hotels/motels, etc. Accordingly, the Project has no potential to conflict with the provisions of Section 19.06.0.30(2) of the City's Zoning Code.

Project Consistency with 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

As previously shown in Table 4-12, the Project would not conflict with the adopted goals of Connect SoCal. SCAG intended that Connect SoCal ensure that the southern California region attains the per capita vehicle miles targets for passenger vehicles identified by CARB, as required by Senate Bill 375. As indicated in MND Subsection 4.17, Project impacts due to vehicle miles traveled (VMT) would be less than significant. The Project also would be consistent with Connect SoCal for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands by locating a proposed manufacturing/business park development in an area that is already developed with similar land uses. Therefore, impacts due to a conflict with the SCAG 2020 RTP/SCS would be less than significant.

Conclusion

As indicated in the preceding analysis, the Project would not conflict with the City of San Bernardino General Plan, Zoning Code, or SCAG's 2020-2045 RTP/SCS. Additionally, the Project would not conflict with any applicable policy document, including, without limitation, the SCAQMD's AQMP or the San Bernardino Regional Greenhouse

Reduction Plan[3]. Therefore, the proposed Project would not 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, and impacts would be less than significant.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region or 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?	☐	☐	☐	☒

a. Would the proposed Project result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?

Determination: Less-than-Significant Impact.

Impact Analysis

According to mapping information available from the CDC, Division of Mines and Geology, the Project site occurs in an area that is mapped as "Mineral Resources Zone 2 (MRZ-2)," which includes, "areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists" (CDC, n.d.). However, the Project site was previously developed as a foundry (Hanford Foundry), which was constructed in approximately 1892 and was demolished between the 1960s and 1980s. Furthermore, the Project site occurs in an urbanized portion of the City of San Bernardino, and residential uses occur to the north, northeast, and east of the Project site. Due to the proximity of residential uses to the Project site, mining operations on site would represent an incompatible land use with the surrounding area. Moreover, the City of San Bernardino General Plan does not designate the Project site or surrounding areas for mineral resources extraction. Moreover, the past uses of the site resulted in the contamination of the soils on site (as discussed further in MND Subsection 4.9), which further restricts the viability of mining activities on site. Thus, although the Project would preclude future mining operations on site, the Project would not result in the loss of any known mineral resources because mining activities on site are not feasible under existing conditions.

[3] The County of San Bernardino Regional Greenhouse Gas Reduction Plan is intended to serve as the basis for cities in the County to develop more detailed community level climate action plans (CAPs). Although the City of San Bernardino has not yet adopted a CAP, the analysis in MND Subsection 4.11 demonstrates that the Project's GHG emissions would be below the SCAQMD screening threshold of 3,000 $MTCO_2e$/yr for residential and commercial projects and well below the SCAQMD screening threshold of 10,000 $MTCO_2e$/yr for industrial projects.

Accordingly, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State, and impacts would be less than significant.

b. Would the proposed 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?

Determination: No Impact.

Impact Analysis

The City of San Bernardino General Plan does not identify the Project site or surrounding areas as a locally-important mineral resources site. The Project site is not located within the boundaries of any adopted specific plans, and there are no other land use plans applicable to the Project area that identify the Project site as a locally-important mineral resource recovery site. Accordingly, the Project would not 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, and no impact would occur.

4.13 NOISE

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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, noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

The analysis in this Subsection is based on a Project-specific technical report prepared by Urban Crossroads, Inc., entitled, "S. Arrowhead Warehouse Noise Impact Analysis" (herein, "NIA"), dated September 23, 2022, and included as *Technical Appendix I* (Urban Crossroads, 2023e).

a. Would the proposed Project result in the 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, noise ordinance, or applicable standards of other agencies?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project is evaluated below for the potential to result in noise levels that exceed the City's General Plan noise standards during construction, due to operational-related traffic, and/or due to on-site operations under long-term conditions. Each is discussed below.

Thresholds of Significance

Noise impacts shall be considered significant if any of the thresholds identified in Table 4-14, *Noise Significance Criteria Summary*, are exceeded. Provided below is a discussion of the thresholds of significance used to evaluate Project-related noise impacts.

Threshold of Significance for Construction-Related Noise

To control noise impacts associated with the construction, the City of San Bernardino Municipal Code has established limits to the hours of operation. Section 8.54.070 the City of San Bernardino Municipal Code indicates that construction activity shall be restricted to the hours within 7:00 a.m. and 8:00 p.m. However, neither the City's General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts, as discussed below. (Urban Crossroads, 2023e, p. 17)

Table 4-14 Noise Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site	Noise-Sensitive[1]	If ambient is < 60 dBA Leq[1]	≥ 5 dBA L_{eq} Project increase	
		If ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA L_{eq} Project increase	
		If ambient is > 65 dBA Leq[1]	≥ 1.5 dBA L_{eq} Project increase	
	Non-Noise-Sensitive[2]	if ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive[1]	Exterior Noise Level Limit[3]	65 dBA L_{eq}	
		If ambient is < 60 dBA Leq[1]	≥ 5 dBA L_{eq} Project increase	
		If ambient is 60 - 65 dBA Leq[1]	≥ 3 dBA L_{eq} Project increase	
		If ambient is > 65 dBA Leq[1]	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive[1]	Restricted to the hours within 7:00 a.m. and 8:00 p.m.[4]		
		Noise Level Threshold[5]	80 dBA L_{eq}	n/a
		Vibration Level Threshold[6]	0.3 PPV (in/sec)	

[1] FICON, 1992.
[2] City of San Bernardino General Plan Noise Element, Figure N-1.
[3] City of San Bernardino Development Code, Section 19.20.030.15(A).
[4] Section 8.54.070 of the City of San Bernardino Municipal Code (Appendix 3.1).
[5] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[6] Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2023e, Table 4-1)

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise-sensitive residential land use. Accordingly, a significant impact would occur if Project construction activities were to expose any nearby sensitive receptors to noise levels exceeding 80 dBA Leq. (Urban Crossroads, 2023e, p. 17)

Thresholds of Significance for Off-Site Traffic and Long-Term Operational Noise

The approach used in the Project's NIA recognizes that there is no single noise increase that renders the noise impact significant. For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for purposes of analysis, a readily perceptible 5 dBA or greater Project-related noise level increase is considered a significant impact when the without Project noise levels are below 60 dBA. Per the Federal Interagency Committee on Noise (FICON), in areas where the without Project noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be appropriate for most people. When the without Project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant

impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or readily perceptible, 3 dBA or barely perceptible, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. For non-noise-sensitive uses, a significant impact would occur if the ambient noise levels exceed 70 dBA CNEL and the Project results in a noise increase of 3.0 dBA or more. These levels of increases and their perceived acceptance are consistent with guidance provided by both the Federal Highway Administration (FHWA) and Caltrans. (Urban Crossroads, 2023e, pp. 21-22 and Table 4-1)

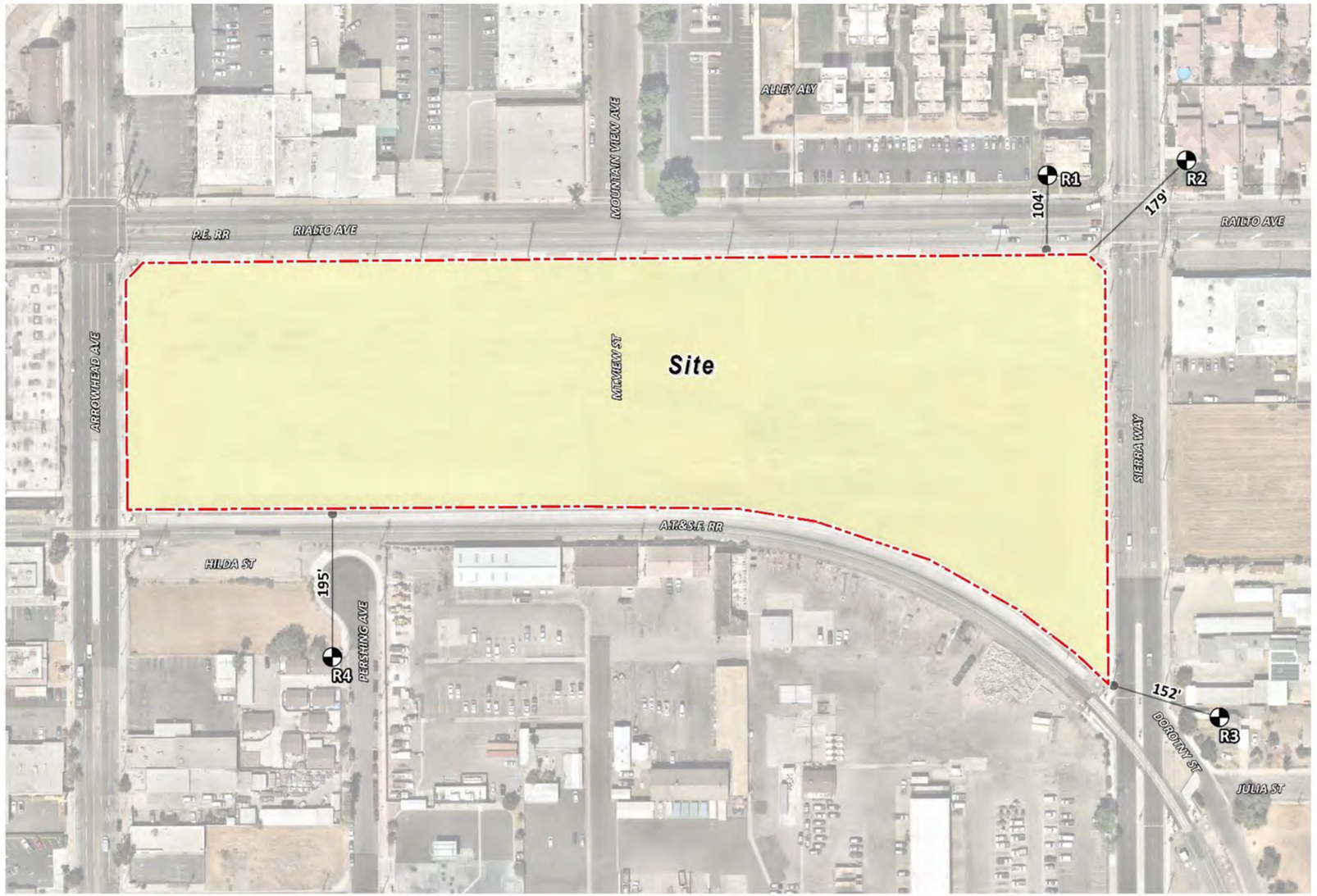
Receiver Locations

To assess the potential for long-term operational and short-term construction noise impacts, sensitive receiver locations, as shown on Figure 4-2, *Noise Receiver Locations*, were identified as representative locations for analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multi-family dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. (Urban Crossroads, 2023e, p. 45)

Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals. (Urban Crossroads, 2023e, p. 45)

To describe the potential off-site Project noise levels, four receiver locations in the vicinity of the Project site were identified. The selection of receiver locations is based on Federal Highway Administration (FHWA) guidelines and is consistent with additional guidance provided by Caltrans and the Federal Transit Administration (FTA). Other sensitive land uses in the Project study area that are located at greater distances than those identified herein would experience lower noise levels than those presented below due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project boundary to each receiver location. (Urban Crossroads, 2023e, p. 45)

R1: Location R1 represents existing noise sensitive residence at 120 West Rialto Avenue, approximately 104 feet north of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R1 is placed at the building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment. (Urban Crossroads, 2023e, p. 45)



Source(s): Urban Crossroads (08-02-2023)

Figure 4-2

Not to Scale

Noise Receiver Locations

R2: Location R2 represents the existing noise sensitive residence at 101 North Sierra Way, approximately 179 feet northeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R2 is placed at the building façade. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment. (Urban Crossroads, 2023e, p. 45)

R3: Location R3 represents the existing noise sensitive residence at 177 South Dorothy Street, approximately 152 feet southeast of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R3 is placed at the building façade. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment. (Urban Crossroads, 2023e, p. 45)

R4: Location R4 represents the existing noise sensitive residence at 162 South Pershing Avenue, approximately 195 feet west of the Project site. Since there are no private outdoor living areas (backyards) facing the Project site, receiver R4 is placed at the building façade. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment. (Urban Crossroads, 2023e, p. 45)

Construction-Related Impacts

The Project has the potential to cause temporary or periodic increases in ambient noise levels during construction activities. Exhibit 10-A of the Project's NIA (*Technical Appendix I*) depicts the construction noise source locations in relation to the nearby sensitive receiver locations that were evaluated as part of the analysis. The results of the analysis are presented below.

Construction Noise Analysis

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed. Consistent with FTA guidance for general construction noise assessment, Table 10-1 of the Project's NIA (*Technical Appendix I*) presents the combined noise levels for the loudest construction equipment, assuming they operate at the same time. As shown on Table 4-15, *Construction Equipment Noise Level Summary*, the construction noise levels are expected to range from 60.0 to 70.0 dBA Leq at the nearby receiver locations. Appendix 10.1 to the Project's NIA includes the detailed CadnaA construction noise model inputs. (Urban Crossroads, 2023e, p. 57)

Construction Noise Compliance

To evaluate whether the Project would generate potentially significant short-term noise levels at nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations would satisfy the reasonable daytime 80 dBA Leq significance threshold during Project construction activities as shown on Table 4-16, *Construction Noise Level Compliance*. Therefore, the noise impacts due to Project construction noise are considered less than significant at all receiver locations. (Urban Crossroads, 2023e, p. 58)

Table 4-15 Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	67.0	70.0	68.0	70.0	64.0	70.0
R2	63.5	66.5	64.5	66.5	60.5	66.5
R3	64.1	67.1	65.1	67.1	61.1	67.1
R4	63.0	66.0	64.0	66.0	60.0	66.0

1 Noise receiver locations are shown on Exhibit 10-A of the Project's NIA (*Technical Appendix I*).

2 Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 to the Project's NIA.

(Urban Crossroads, 2023e, Table 10-2)

Table 4-16 Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	70.0	80	No
R2	66.5	80	No
R3	67.1	80	No
R4	66.0	80	No

1 Noise receiver locations are shown on Exhibit 10-A of the Project's NIA (*Technical Appendix I*).

2 Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 10-2 of the Project's NIA.

3 Construction noise level thresholds as shown on Table 4-1 of the Project's NIA.

4 Do the estimated Project construction noise levels exceed the construction noise level threshold?

(Urban Crossroads, 2023e, Table 10-3)

Nighttime Concrete Pour Noise Analysis

Nighttime concrete pouring activities are likely occur as a part of Project building construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building pad area as shown on Exhibit 10-B of the Project's NIA (*Technical Appendix I*). Nighttime concrete pours would take place outside the permitted time set forth by City of San Bernardino Municipal Code, Section 8.54.070, which indicates that construction activity is restricted to the hours within 7:00 a.m. and 8:00 p.m. The Project Applicant would be required to obtain authorization for nighttime work from the City of San Bernardino. Any nighttime construction noise activities shall satisfy the City's construction-related noise threshold (80 dBA Leq). (Urban Crossroads, 2023e, p. 59)

To estimate the noise levels due to nighttime concrete pour activities, sample reference noise level measurements were taken during a nighttime concrete pour at a construction site. Urban Crossroads, Inc. collected short-term

nighttime concrete pour reference noise level measurements during the noise-sensitive nighttime hours between 1:00 a.m. to 2:00 a.m. at 27334 San Bernardino Avenue in the City of Redlands. The reference noise levels describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. (Urban Crossroads, 2023e, p. 59)

To describe the nighttime concrete pour noise levels associated with the construction of the Project, the Project's NIA relies on reference sound power level of 100.3 dBA Lw. While the Project noise levels will depend on the actual duration of activities and specific equipment fleet in use at the time of construction, the reference sound power level of 100.3 dBA Lw is used to describe the expected Project nighttime concrete pour noise activities. (Urban Crossroads, 2023e, p. 59)

As shown on Table 4-17, *Nighttime Concrete Pour Noise Level Compliance*, the noise levels associated with the nighttime concrete pour activities are estimated to range from 42.8 to 54.7 dBA Leq and would satisfy the City of San Bernardino stationary-source exterior hourly average Leq residential noise level threshold of 65 dBA Leq at all the receiver locations. Based on the results of this analysis, all nearest noise receiver locations would experience less than significant impacts due to the Project related nighttime concrete pour activities. Appendix 10.2 of the Project's NIA (MND *Technical Appendix I*) includes the CadnaA nighttime concrete pour noise model inputs. (Urban Crossroads, 2023e, p. 61)

Table 4-17 Nighttime Concrete Pour Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Paving Construction[2]	Nighttime Threshold[3]	Threshold Exceeded?[4]
R1	45.6	65	No
R2	42.8	65	No
R3	49.4	65	No
R4	54.7	65	No

1 Noise receiver locations are shown on Exhibit 8-B of the Project's NIA (*Technical Appendix I*).
2 Paving construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.
3 Exterior nighttime noise level standards as shown on Table 4-1 of the Project's NIA.
4 Do the estimated Project construction noise levels exceed the nighttime construction noise level threshold?

(Urban Crossroads, 2023e, Table 10-4)

Conclusion – Construction-Related Noise Impacts

As demonstrated by the preceding analysis, Project-related construction activities would not expose any nearby sensitive receptors to noise levels exceeding 80 dBA Leq. In addition, during nighttime concrete pouring activities, the Project's construction noise would not expose any nearby sensitive receptors to noise levels exceeding 65 dBA Leq. Accordingly, Project-related noise impacts during construction activities would be less than significant and no mitigation measures would be required.

Traffic-Related Operational Noise Impacts

To assess the off-site transportation CNEL noise level impacts associated with development of the proposed Project, noise contours were developed based on the Project's Traffic Impact Analysis ("TA"; *Technical Appendix J2*). Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Refer to NIA Subsection 7.1 and NIA Tables 7-1 through 7-8 for a complete discussion of the noise contours used in the analysis. (Urban Crossroads, 2023e, pp. 35-39)

Existing Project Traffic Noise Level Increases

An analysis of existing traffic noise levels plus traffic noise generated by the proposed Project has been included in the Project's NIA (*Technical Appendix I*) for informational purposes and to fully analyze all the existing traffic scenarios identified in the Project's TA. However, the analysis of existing off-site traffic noise levels plus traffic noise generated by the proposed Project scenario would not actually occur since the Project would not be fully constructed and operational until Year 2023 conditions. Table 7-1 of the Project's NIA shows the Existing without Project conditions CNEL noise levels. The Existing without Project exterior noise levels range from 68.1 to 73.9 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-2 of the Project's NIA shows the Existing with Project conditions would range from 68.1 to 74.0 dBA CNEL. Table 4-18, *Existing With Project Traffic Noise Level Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 0.6 dBA CNEL on the study area roadway segments. Based on the significance criteria for off-site traffic noise presented in Table 4-14, land uses adjacent to the study area roadway segments would experience less-than-significant noise level increases on receiving land uses due to the Project-related traffic. (Urban Crossroads, 2023e, p. 39)

Table 4-18 Existing With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Arrowhead Av.	n/o Rialto Av.	Non-Sensitive	69.7	69.8	0.1	1.5	No
2	Arrowhead Av.	s/o Rialto Av.	Non-Sensitive	69.9	70.3	0.4	1.5	No
3	Arrowhead Av.	s/o Dwy. 2	Sensitive	73.4	74.0	0.6	1.5	No
4	Sierra Wy.	n/o Rialto Av.	Sensitive	68.1	68.1	0.0	1.5	No
5	Sierra Wy.	s/o Rialto Av.	Non-Sensitive	69.4	69.6	0.2	1.5	No
6	Sierra Wy.	s/o Dwy. 6	Sensitive	69.4	69.4	0.0	1.5	No
7	Rialto Av.	w/o Arrowhead Av.	Non-Sensitive	73.2	73.2	0.0	1.5	No
8	Rialto Av.	w/o Mountain View Av.	Non-Sensitive	73.4	73.7	0.3	1.5	No
9	Rialto Av.	e/o Mountain View Av.	Sensitive	73.3	73.5	0.2	1.5	No
10	Rialto Av.	w/o Sierra Wy.	Sensitive	73.9	74.0	0.1	1.5	No
11	Rialto Av.	e/o Sierra Wy.	Sensitive	72.5	72.5	0.0	1.5	No

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-14)?

(Urban Crossroads, 2023e, Table 7-9)

Existing Plus Ambient (EA) 2023 Traffic Noise Level Increases

Table 7-3 of the Project's NIA (*Technical Appendix I*) presents the Existing plus Ambient (EA) 2023 without Project conditions CNEL noise levels. The EA (2023) without Project exterior noise levels would range from 68.2 to 74.1 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-4 of the Project's NIA shows that the EA (2023) with Project conditions will range from 68.2 to 74.1 dBA CNEL. Table 4-19, *EA (2023) With Project Traffic Noise Level Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 0.6 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 4-14, land uses adjacent to the study area roadway segments would experience less-than-significant noise level increases on receiving land uses due to the Project-related traffic. (Urban Crossroads, 2023e, pp. 39-40)

Table 4-19 EA (2023) With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Arrowhead Av.	n/o Rialto Av.	Non-Sensitive	69.9	69.9	0.0	1.5	No
2	Arrowhead Av.	s/o Rialto Av.	Non-Sensitive	70.0	70.5	0.5	1.5	No
3	Arrowhead Av.	s/o Dwy. 2	Sensitive	73.5	74.1	0.6	1.5	No
4	Sierra Wy.	n/o Rialto Av.	Sensitive	68.2	68.2	0.0	1.5	No
5	Sierra Wy.	s/o Rialto Av.	Non-Sensitive	69.6	69.7	0.1	1.5	No
6	Sierra Wy.	s/o Dwy. 6	Sensitive	69.5	69.5	0.0	1.5	No
7	Rialto Av.	w/o Arrowhead Av.	Non-Sensitive	73.3	73.3	0.0	1.5	No
8	Rialto Av.	w/o Mountain View Av.	Non-Sensitive	73.6	73.8	0.2	1.5	No
9	Rialto Av.	e/o Mountain View Av.	Sensitive	73.5	73.6	0.1	1.5	No
10	Rialto Av.	w/o Sierra Wy.	Sensitive	74.1	74.1	0.0	1.5	No
11	Rialto Av.	e/o Sierra Wy.	Sensitive	72.6	72.6	0.0	1.5	No

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-14)?

(Urban Crossroads, 2023e, Table 7-10)

Existing Plus Ambient Plus Cumulative (EAC) 2023 Traffic Noise Level Increases

Table 7-5 of the Project's NIA (*Technical Appendix I*) presents the Existing plus Ambient plus Cumulative (EAC) 2023 without Project conditions CNEL noise levels. The EAC (2023) without Project exterior noise levels range from 68.4 to 74.1 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-6 of the Project's NIA shows that the EAC (2023) with Project conditions would range from 68.4 to 74.0 dBA CNEL. Table 4-20, *Existing Plus Ambient Plus Cumulative (2023) With Project* Traffic Noise Level *Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 0.5 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 4-14, land uses adjacent to the study area

roadway segments would experience less-than-significant noise level increases on receiving land uses due to the Project-related traffic. (Urban Crossroads, 2023e, p. 40)

Table 4-20 Existing Plus Ambient Plus Cumulative (2023) With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Arrowhead Av.	n/o Rialto Av.	Non-Sensitive	70.0	70.1	0.1	1.5	No
2	Arrowhead Av.	s/o Rialto Av.	Non-Sensitive	70.2	70.6	0.4	1.5	No
3	Arrowhead Av.	s/o Dwy. 2	Sensitive	73.7	74.2	0.5	1.5	No
4	Sierra Wy.	n/o Rialto Av.	Sensitive	68.4	68.4	0.0	1.5	No
5	Sierra Wy.	s/o Rialto Av.	Non-Sensitive	69.9	70.1	0.2	1.5	No
6	Sierra Wy.	s/o Dwy. 6	Sensitive	69.6	69.7	0.1	1.5	No
7	Rialto Av.	w/o Arrowhead Av.	Non-Sensitive	73.4	73.4	0.0	1.5	No
8	Rialto Av.	w/o Mountain View Av.	Non-Sensitive	73.7	73.9	0.2	1.5	No
9	Rialto Av.	e/o Mountain View Av.	Sensitive	73.6	73.8	0.2	1.5	No
10	Rialto Av.	w/o Sierra Wy.	Sensitive	74.1	74.2	0.1	1.5	No
11	Rialto Av.	e/o Sierra Wy.	Sensitive	72.7	72.7	0.0	1.5	No

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-14)?

(Urban Crossroads, 2023e, Table 7-11)

Horizon Year (HY) 2040 Traffic Noise Level Increases

Table 7-7 of the Project's NIA (*Technical Appendix I*) presents the Horizon Year (HY) 2040 without Project conditions CNEL noise levels. The HY (2040) without Project exterior noise levels range from 68.8 to 74.6 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-8 of the Project's NIA shows that the HY (2040) with Project conditions would range from 68.8 to 74.6 dBA CNEL. Table 4-21, *Horizon Year (2040) With Project Traffic Noise Level Increases*, shows that the Project off-site traffic noise level increases would range from 0.0 to 0.5 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 4-14, land uses adjacent to the study area roadway segments would experience less than significant noise level increases on receiving land uses due to the Project-related traffic. (Urban Crossroads, 2023e, p. 40)

Conclusion – Operational Off-Site Traffic-Related Noise Impacts

As demonstrated by the preceding analysis, Project-related traffic under long-term operational activities would not expose any sensitive receptors along study area roadways to noise levels exceeding the noise criteria presented in Table 4-14. Accordingly, Project-related operational off-site traffic-related noise impacts would be less than significant, and no mitigation measures would be required.

Table 4-21 Horizon Year (2040) With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Arrowhead Av.	n/o Rialto Av.	Non-Sensitive	70.5	70.5	0.0	1.5	No
2	Arrowhead Av.	s/o Rialto Av.	Non-Sensitive	70.9	71.2	0.3	1.5	No
3	Arrowhead Av.	s/o Dwy. 2	Sensitive	74.1	74.6	0.5	1.5	No
4	Sierra Wy.	n/o Rialto Av.	Sensitive	68.8	68.8	0.0	1.5	No
5	Sierra Wy.	s/o Rialto Av.	Non-Sensitive	70.4	70.6	0.2	1.5	No
6	Sierra Wy.	s/o Dwy. 6	Sensitive	70.1	70.1	0.0	1.5	No
7	Rialto Av.	w/o Arrowhead Av.	Non-Sensitive	73.8	73.8	0.0	1.5	No
8	Rialto Av.	w/o Mountain View Av.	Non-Sensitive	74.1	74.3	0.2	1.5	No
9	Rialto Av.	e/o Mountain View Av.	Sensitive	74.0	74.1	0.1	1.5	No
10	Rialto Av.	w/o Sierra Wy.	Sensitive	74.6	74.6	0.0	1.5	No
11	Rialto Av.	e/o Sierra Wy.	Sensitive	73.1	73.1	0.0	1.5	No

1 Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.

2 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.

3 Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-14)?

(Urban Crossroads, 2023e, Table 7-12)

On-Site Operational-Related Noise Impacts

Operational Noise Sources

The operational noise analysis is intended to describe noise level impacts associated with the expected typical of daytime and nighttime activities at the Project site. To present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. Consistent with similar manufacturing/business park uses, the Project business operations 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. The on-site Project-related noise sources are expected to include the following: loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements. (Urban Crossroads, 2023e, p. 47)

Project Operational Noise Levels

Using the reference noise levels to represent the proposed Project operations that include loading dock activity, roof-top air conditioning units, trash enclosure activity, parking lot vehicle movements, and truck movements, Urban Crossroads, Inc. calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 4-22, *Daytime Project Operational Noise Levels*, shows the Project operational noise

levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 43.5 to 54.7 dBA Leq. (Urban Crossroads, 2023e, p. 51)

Table 4-22 Daytime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)			
	R1	R2	R3	R4
Loading Dock Activity	30.8	28.5	47.4	54.1
Roof-Top Air Conditioning Units	40.9	38.5	36.1	30.0
Trash Enclosure Activity	16.1	11.3	29.0	34.1
Parking Lot Vehicle Movements	41.5	39.0	39.6	39.9
Truck Movements	41.4	38.1	43.0	44.0
Total (All Noise Sources)	**46.2**	**43.5**	**49.5**	**54.7**

1 See Exhibit 9-A of the Project's NIA (*Technical Appendix I*) for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1.

(Urban Crossroads, 2023e, Table 9-2)

Table 4-23, *Nighttime Project Operational Noise Levels*, shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 42.8 to 54.7 dBA Leq. The differences between the daytime and nighttime noise levels are largely related to the estimated duration of noise activity. (Urban Crossroads, 2023e, p. 51)

Table 4-23 Nighttime Project Operational Noise Levels

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)			
	R1	R2	R3	R4
Loading Dock Activity	30.8	28.5	47.4	54.1
Roof-Top Air Conditioning Units	38.5	36.1	33.7	27.6
Trash Enclosure Activity	15.1	10.3	28.0	33.1
Parking Lot Vehicle Movements	41.5	39.0	39.6	39.9
Truck Movements	41.4	38.1	43.0	44.0
Total (All Noise Sources)	**45.6**	**42.8**	**49.4**	**54.7**

1 See Exhibit 9-A of the Project's NIA (*Technical Appendix I*) for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1.

(Urban Crossroads, 2023e, Table 9-3)

Project Operational Noise Level Compliance

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of San Bernardino exterior noise level standards at nearby noise-sensitive receiver locations. Table 4-24, *Operational Noise Level Compliance*, shows the operational noise levels associated with the Project would satisfy the City of San Bernardino exterior noise level standards. Therefore, the operational noise impacts would be less than significant at the nearby noise-sensitive receiver locations. (Urban Crossroads, 2023e, p. 52)

Table 4-24 Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]	Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime		Daytime	Nighttime
R1	46.2	45.6	65	No	No
R2	43.5	42.8	65	No	No
R3	49.5	49.4	65	No	No
R4	54.7	54.7	65	No	No

1 See Figure 4-2 for the receiver locations.
2 Proposed Project operational noise levels as shown on Table 4-22 and Table 4-23.
3 Exterior noise level standards, as shown on Table 4-14.
4 Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
(Urban Crossroads, 2023e, Table 9-4)

Project Operational Noise Level Increases

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added, as discussed in Subsection 9.5 of the Project's NIA (*Technical Appendix I*). The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. Noise levels that would be experienced at receiver locations when Project-source noise is added to the daytime and nighttime ambient conditions are presented on Table 4-25, *Daytime Operational Noise Level Increases*, and Table 4-26, *Nighttime Operational Noise Level Increases*, respectively. As indicated on Table 4-25, the Project would generate a daytime operational noise level increases ranging from 0.0 to 1.5 dBA Leq at the nearest receiver locations. Table 4-26 shows that the Project would generate a nighttime operational noise level increases ranging from 0.0 to 2.1 dBA Leq at the nearest receiver locations. Project-related operational noise level increases would satisfy the operational noise level increase significance criteria presented in Table 4-14; thus, the Project's operational noise increases at the sensitive receiver locations would be less than significant. (Urban Crossroads, 2023e, pp. 52-53)

Conclusion – Project Operational Noise Impacts

As demonstrated in the preceding analysis, the Project would not expose nearby sensitive receptors to operational daytime or nighttime noise levels exceeding the thresholds of significance identified in Table 4-14. The Project's operational noise level increases also would not exceed the identified thresholds of significance. Accordingly, Project-related operational noise impacts during both daytime and nighttime hours would be less than significant, and no mitigation would be required.

Table 4-25 Daytime Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	46.2	L1	67.4	67.4	0.0	1.5	No
R2	43.5	L1	67.4	67.4	0.0	1.5	No
R3	49.5	L2	58.9	59.4	0.5	5.0	No
R4	54.7	L3	58.4	59.9	1.5	5.0	No

1 See Figure 4-2 for the receiver locations.
2 Total Project daytime operational noise levels as shown on Table 4-22.
3 Reference noise level measurement locations as shown on Exhibit 5-A of the Project's NIA (*Technical Appendix I*).
4 Observed daytime ambient noise levels as shown on Table 5-1 of the Project's NIA.
5 Represents the combined ambient conditions plus the Project activities.
6 The noise level increase expected with the addition of the proposed Project activities.
7 Significance increase criteria as shown on Table 4-14.
(Urban Crossroads, 2023e, Table 9-5)

Table 4-26 Nighttime Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	45.6	L1	63.2	63.3	0.1	5.0	No
R2	42.8	L1	63.2	63.2	0.0	5.0	No
R3	49.4	L2	55.0	56.1	1.1	5.0	No
R4	54.7	L3	56.8	58.9	2.1	5.0	No

1 See Figure 4-2 for the receiver locations.
2 Total Project daytime operational noise levels as shown on Table 4-23.
3 Reference noise level measurement locations as shown on Exhibit 5-A of the Project's NIA (*Technical Appendix I*).
4 Observed daytime ambient noise levels as shown on Table 5-1 of the Project's NIA.
5 Represents the combined ambient conditions plus the Project activities.
6 The noise level increase expected with the addition of the proposed Project activities.
7 Significance increase criteria as shown on Table 4-14.
(Urban Crossroads, 2023e, Table 9-5)

b. Would the proposed Project result in the generation of excessive groundborne vibration or groundborne noise levels?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project has the potential to result in the generation of excessive groundborne vibration or groundborne noise levels during both construction and long-term operation. Each is discussed below.

Threshold of Significance

Vibration-generating activities are evaluated using the Caltrans vibration damage thresholds to assess potential temporary construction-related impacts at adjacent building locations. The nearest noise sensitive buildings adjacent to the Project site can best be described as "older residential structures" with a maximum acceptable continuous vibration threshold of 0.3 Peak Particle Velocity ("PPV"; in/sec). Accordingly, a significant vibration-related impact would occur if the Project were to expose nearby noise-sensitive buildings to vibration levels exceeding 0.3 PPV. (Urban Crossroads, 2023e, p. 22)

Construction Vibration Analysis

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized on Table 10-5 of the Project's NIA (*Technical Appendix I*). Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential for human response (annoyance) and building damage using the following vibration assessment methods defined by the FTA. (Urban Crossroads, 2023e, p. 61)

Table 4-27, *Project Construction Vibration Levels*, presents the expected Project related vibration levels at the nearby receiver locations. At distances ranging from 104 to 195 feet from Project construction activities, construction vibration velocity levels are estimated to range from 0.010 to 0.025 in/sec PPV. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec), the typical Project construction vibration levels would fall below the building damage thresholds at all the noise sensitive receiver locations. Therefore, the Project-related vibration impacts are considered less than significant during typical construction activities at the Project site. (Urban Crossroads, 2023e, p. 62)

Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter (Urban Crossroads, 2023e, p. 62). Accordingly, the Project would not result in the generation of excessive groundborne vibration or groundborne noise levels during construction, and impacts would be less than significant.

Operational Vibration Analysis

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. The Project would generate up to 142 truck trips per day, including 3 truck trips in the a.m. peak hour and 7 truck trips during the PM peak hour (Urban Crossroads, 2023, Table 4-1). Caltrans has issued a publication entitled, "Transportation Construction Vibration Guidance Manual," dated April 2020 (Caltrans, 2020). As noted by Caltrans:

> "*Because vehicles traveling on highway are supported on flexible suspension systems and pneumatic tires, these vehicles are not an efficient source of ground vibration. They can, however, impart vibration into the*

Table 4-27 Project Construction Vibration Levels

Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	104'	0.000	0.004	0.009	0.010	0.025	0.025	0.3	No
R2	179'	0.000	0.002	0.004	0.005	0.011	0.011	0.3	No
R3	152'	0.000	0.002	0.005	0.006	0.014	0.014	0.3	No
R4	195'	0.000	0.002	0.003	0.004	0.010	0.010	0.3	No

1 Receiver locations are shown on Figure 4-2.
2 Distance from receiver building facade to Project construction boundary (Project site boundary).
3 Based on the Vibration Source Levels of Construction Equipment (Table 8-5 of the Project's NIA, included as *Technical Appendix I*).
4 Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
5 Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
(Urban Crossroads, 2023e, Table 10-6)

ground when they roll over pavement that is not smooth. Continuous traffic traveling on a smooth highway creates a fairly continuous but relatively low level of vibration. Where discontinuities exist in the pavement, heavy truck passages can be the primary source of localized, intermittent vibration peaks. These peaks typically last no more than a few seconds and often for only a fraction of a second. Because vibration drops off rapidly with distance, there is rarely a cumulative increase in ground vibration from the presence of multiple trucks." (Caltrans, 2020, p. 10)

All trucks generated by the Project would travel along City roadways that are regularly maintained to prevent discontinuous pavement (e.g., potholes). As such, and based on guidance from Caltrans, the Project's operational traffic-related vibration impacts would be less than significant.

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?

Determination: Less-than-Significant Impact.

Impact Analysis

The San Bernardino International Airport (SBIA) is located approximately 1.6 miles southeast of the Project site. This places the Project site within the SBIA Influence Area. The SBIA was initially built as Norton Air Force Base by the United States Air Force (USAF). Under the Base Realignment and Closure Act of 1990, Norton Air Force base was closed and disposed of by the USAF for a civilian aviation reuse in 1994 and transferred to the San Bernardino International Airport Authority (SBIAA). The SBIAA operates the facility as a public-use general aviation airport that accommodates aircraft ranging from piston-powered propeller aircraft to multi-engine jet aircraft including large air cargo aircraft. The latest aircraft noise contour boundaries for the SBIA were published by the SBIAA on July 2, 2019, as part of the Eastgate Air Cargo Facility Final Environmental Assessment. The future SBIA noise level

contours boundaries representing approximately 87,500 annual aircraft operations are shown on Exhibit 3-C of the Project's NIA (*Technical Appendix I*). As shown on NIA Exhibit 3-C, the Project site is located outside the 60 dBA CNEL noise level contours of the SBIA. Therefore, the Project land use is considered "normally acceptable" according to the City of San Bernardino Community Noise and Land Use Compatibility guidelines as shown on Exhibit 3-A of the Project's NIA. Accordingly, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels, and impacts would therefore be less than significant. (Urban Crossroads, 2023e, p. 18)

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project result in:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Would the proposed 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?

Determination: Less-than-Significant Impact.

Impact Analysis

Under existing conditions, the Project site is designated by the City of San Bernardino General Plan for "Commercial Heavy (CH)." The Project Applicant is proposing three manufacturing/business park buildings that would be fully consistent with the site's existing CH land use designation (as demonstrated in detail under the analysis of Land Use and Planning in MND Subsection 4.11). As such, the number of employees that would be generated by the Project would be similar to what was anticipated by the General Plan for the Project site. Because the Project would generate a similar number of employees as compared to what was anticipated by the City's General Plan, it can be concluded that the Project would not directly induce substantial unplanned population growth in the Project area. In addition, the Project's proposed roadway and other infrastructure (e.g., water, sewer, etc.) improvements have been designed and sized to serve the proposed Project, and would not indirectly induce growth in the local area. Impacts would be less than significant.

b. Would the proposed Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Determination: No Impact.

Impact Analysis

Under existing conditions (and as previously shown on MND Figure 2-6), the Project site is vacant and undeveloped, and does not contain any existing housing or residents. As such, the Project has no potential to displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 following public services?				
a. Fire protection?	☐	☐	☒	☐
b. Police Protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 fire protection services?

Determination: Less-than-Significant Impact.

Impact Analysis

The San Bernardino Fire District (SBFD) provides fire protection services within the City of San Bernardino. The nearest station to the Project site is San Bernardino County Fire Station No. 221, located at 200 E. 3rd Street in the City of San Bernardino, or approximately 0.4 roadway mile northeast of the Project site. The second nearest fire station is San Bernardino City Fire Station No. 233, located at 602 S. Tippecanoe Avenue in the City of San Bernardino, or approximately 2.2 roadway miles southeast of the Project site. (Google Earth, n.d.)

Development of the Project would impact fire protection services by placing an additional demand on existing SBFD resources should its resources not be augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access. The Project accommodates secondary access for emergency vehicles, minimum 30-foot-wide fire access lanes around each of the proposed buildings, and fire hydrants would be installed in accordance with SBFD requirements. Furthermore, the proposed Project would be required to comply with Chapter 3.27 (Development Impact Fees [DIF]) of the City's Municipal Code, which requires a fee payment to assist the City and the SBFD in providing for fire protection services. Payment of the DIF fee would ensure that the Project provides fair-share funds for the provision of additional public services, including fire protection services, which may be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project.

Accordingly, with mandatory compliance with State and local fire codes as well as Chapter 3.27 of the City's Municipal Code, the proposed Project would not directly result in the need for any new or expanded fire protection facilities, the construction of which could cause significant environmental impacts. Impacts would be less than significant.

b. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 police protection services?

Determination: Less-than-Significant Impact.

Impact Analysis

Police protection services in the Project area are provided by the San Bernardino Police Department (SBPD). The nearest SBPD station to the Project site is located at 710 North D Street in the City of San Bernardino, or approximately 0.8-mile northwest of the Project site. The Project site is located in a developed area of the City that is patrolled regularly. The Project would entail development of the Project site with three manufacturing/business park buildings ranging in size from 50,432 s.f. to 106,755 s.f. The Project site is planned for "Commercial Heavy (CH)" uses under existing conditions, and the manufacturing/business park land uses proposed as part of the Project would be consistent with the site's existing land use designations and would not result in a substantial increase in the demand for police protection services beyond what is already planned for the site. In addition, any incremental increase in demand for police services and facilities would be off-set by future property taxes generated by the Project. Furthermore, the proposed Project would be required to comply with Chapter 3.27 (Development Impact Fees) of the City's Municipal Code, which requires a fee payment to assist the City and the SBPD in providing for police protection services. No new or expanded police protection services would be required for the proposed Project. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 police protection services, and impacts would be less than significant.

c. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 school services?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project Applicant proposes to develop the Project site with up to 230,320 s.f. of manufacturing/ business park uses. Thus, while the Project would result in an increase of approximately 327 jobs, the Project does not include a residential component that would directly result in the generation of a student population requiring new or expanded school facilities. Nonetheless, it is possible that a portion of the jobs that would be created by the Project would attract a new resident population in the local area and therefore the Project could result in indirect impacts to school facilities. Although it is possible that the San Bernardino City Unified School District (SBCUSD) may ultimately need to construct new school facilities to serve the growing population within their service boundaries, such facility planning is conducted by SBCUSD and is not the responsibility of the Project. Furthermore, the proposed Project would be required to contribute fees to the SBCUSD in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). The SBCUSD assesses school impact fees at a rate of $0.66 per square foot of assessable commercial and industrial space. Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation for project-related impacts to school services. Therefore, mandatory payment of school impact fees would reduce the Project's impacts to school facilities to a level below significance.

d. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 park services?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project Applicant does not propose any residential uses and therefore would not result in a direct demand for recreational facilities. The Project would result in only a nominal increase in the City's residential population, as it is anticipated that most jobs generated by the Project would be filled by existing City residents or residents of surrounding communities. Thus, the Project would not directly result in the need for new or expanded park facilities or services. Furthermore, the proposed Project would be required to comply with Chapter 3.27 (Development Impact Fees) of the City's Municipal Code, which requires a fee payment to assist the City in providing for parks and recreational facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 park and recreational facilities, and impacts would be less than significant.

e. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 other public services?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project Applicant proposes to develop the Project site with up to 230,320 s.f. of manufacturing/ business park uses. The Project would result in only a nominal increase in the City's residential population, as it is anticipated that most jobs generated by the Project would be filled by existing City residents or residents of surrounding communities. Thus, the proposed Project would not directly result in the need for new or expanded library facilities. Furthermore, the proposed Project would be required to comply with Chapter 3.27 (Development Impact Fees) of the City's Municipal Code, which requires a fee payment to assist the City in providing for library facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 library services, and impacts would be less than significant.

4.16 RECREATION

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a. Would the proposed Project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project Applicant does not propose any residential uses and therefore would not result in a direct demand for recreational facilities. The Project would result in only a nominal increase in the City's residential population,

as it is anticipated that most jobs generated by the Project would be filled by existing City residents or residents of surrounding communities. Notwithstanding, there is a potential for future employees to utilize existing recreational resources within the City. However, given the relatively low number of employees that would be generated by the Project (327 employees), the Project would not result in the increase in the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Moreover, the proposed Project would be required to comply with Chapter 3.27 (Development Impact Fees) of the City's Municipal Code, which requires a fee payment to assist the City in providing for parks and recreational facilities. Any potential incremental increase in impacts to existing parks and recreational facilities that may result from Project development would be offset through the payment of DIF fees pursuant to Municipal Code Chapter 3.27. Therefore, the Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

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?

Determination: No Impact.

Impact Analysis

Refer to the analysis of Threshold 4.16.a. As noted therein, the Project would not result in or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. In addition, no recreational facilities would be constructed or improved as part of the Project. Therefore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and no impact would occur.

4.17 TRANSPORTATION

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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?	☐	☐	☒	☐
b. Conflict with or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The analysis in this Subsection is based on two technical reports prepared by Urban Crossroads, Inc. The first report addresses the Project's potential impacts due to vehicle miles traveled (VMT), is entitled, "South Arrowhead Avenue Vehicle Miles Traveled (VMT) Analysis" (herein, "VMT Analysis"), is dated September 7, 2022, and is included as *Technical Appendix J1* (Urban Crossroads, 2022). The second report addresses the Project's effects on level of service (LOS), is entitled, "S. Arrowhead Warehouse Traffic Analysis" ("TA"), is dated May 6, 2022, and is included as *Technical Appendix J2* (Urban Crossroads, 2023).

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

Determination: Less-than-Significant Impact.

Impact Analysis

Applicable programs, plans, ordinances, or policies applicable to the Project area are the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"; also referred to as "*Connect SoCal*"), the City's General Plan Circulation Element, and the City's Municipal Code. Each is discussed below.

SCAG 2020-2045 RTP/SCS (*Connect SoCal*)

As previously shown in Table 4-12, the Project would not conflict with the adopted goals of *Connect SoCal*. SCAG intended that *Connect SoCal* ensure that the southern California region attains the per capita vehicle miles targets for passenger vehicles identified by CARB, as required by Senate Bill 375. As indicated under the analysis of Threshold b., below, Project impacts due to vehicle miles traveled (VMT) would be less than significant. The Project also would be consistent with *Connect SoCal* for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands by locating a proposed manufacturing/business park development in an area that is already developed with similar land uses. Therefore, impacts due to a conflict with the SCAG *2020-2045 RTP/SCS* would be less than significant.

City of San Bernardino Municipal Code

As previously indicated in MND Subsection 4.11 (refer to the analysis of Threshold b.), the Project as proposed would be consistent with the site's underlying zoning classification of "CH (Commercial Heavy)." Impacts to the environment associated with the proposed Project are evaluated throughout this MND, and where significant impacts are identified, mitigation measures are imposed to reduce impacts to below a level of significance. There are no components proposed Project that would result in impacts not already evaluated and disclosed by this MND, including impacts due to a conflict with the site's underlying zoning classification of CH. Furthermore, in addition to a review for compliance with the site's underlying zoning classification, City of San Bernardino staff also conducted a review of the Project's application materials, and determined that the Project would be in full compliance with other requirements of the City's Municipal Code, including Title 8 (Health and Safety), requirements related to noise (Municipal Code Chapter 8.54, Noise Control), and requirements related to storm water drainage (Municipal Code Chapter 8.80, Storm Water Drainage Systems). Accordingly, Project impacts due to a conflict with the City's Municipal Code would be less than significant.

City of San Bernardino General Plan Circulation Element

The following discussion provides an analysis of the Project's consistency with applicable General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As indicated below, the Project would not conflict with any applicable General Plan policies addressing the circulation system. As such, Project impacts would be less than significant.

Policy 6.2.1 - Maintain a peak hour level of service D or better at street intersections.

Policy 6.2.1 of the City of San Bernardino's General Plan Circulation Element establishes a goal to "[m]aintain a peak hour level of service D or better at street intersections." Although SB 743 and the CEQA Guidelines stipulate that environmental impact conclusions for transportation must be based on VMT (discussed in threshold b. below) and not LOS, a TA was prepared for the Project to evaluate the Project's effects to LOS at Study Area intersections, the results of which are presented in EIR *Technical Appendix J2*. The TA evaluates the Project's consistency with applicable City of San Bernardino LOS performance standards, as well as LOS performance standards established by the City of Highland and Caltrans. The Project's TA demonstrates that all study area facilities would operate at acceptable LOS (i.e., LOS D or better) under all study scenarios with the addition of Project traffic. Thus, the Project would be fully consistent with General Plan Policy 6.2.1.

Policy 6.2.3 – Keep traffic in balance with roadway capacity by requiring traffic studies to identify local roadway and intersection improvements necessary to mitigate the traffic impacts of new developments and land use changes.

The Project's TA prepared by Urban Crossroads (*Technical Appendix J2*) identifies transportation improvements needed along the Project's frontages with Arrowhead Avenue, Rialto Avenue, and Sierra Way. Implementation of the necessary site-adjacent improvements would ensure that the transportation system serving Project-related traffic functions at acceptable levels of service and/or the volume-to-capacity (v/c) ratio for affected facilities would be at pre-Project conditions or better. Thus, the Project would be consistent with General Plan Policy 6.2.3.

Policy 6.3.7 – Require that adequate access be provided to all developments in the City including secondary access to facilitate emergency access and egress.

The Project site is not identified as a designated emergency access route. During the course of the City of San Bernardino and San Bernardino County Fire Department's required review of the Project's applications, the Project's design is reviewed to ensure that adequate access to and from the site is provided for emergency vehicles during both construction and long-term operation. As part of the Project's application review process, and during subsequent review and approval processes for building permits, the City of San Bernardino and County of San Bernardino Fire Departments are responsible for reviewing the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project Site and that the Project would not substantially impede emergency response times in the local area. Accordingly, the Project would be consistent with General Plan Policy 6.3.7.

Policy 6.5.4 – Require that on-site loading areas minimize interference of truck loading activities with efficient traffic circulation on adjacent roadways.

The Project is designed to contain a total of five driveways and an adequate number of dock doors to service the proposed buildings. Driveway connections serving the buildings would include one driveway along Arrowhead Avenue, two driveways along Rialto Avenue, and two driveways along Sierra Way. The two driveways along Rialto Avenue, as well as the southern driveway along Sierra Way and the driveway along Arrowhead Avenue, are designed as the truck entry and exit driveways. Trucks would enter the driveways, have access to a truck staging parking area, and enter through a security gate to access the docking doors. Furthermore, pursuant to Title 13 of the California Code of Regulations, Section 2485, large trucks would be limited to no more than five minutes of idling. Accordingly, implementation of the Project would not cause an interference with traffic circulation on adjacent roadways due to on-site loading activities, and the Project would therefore be consistent with General Plan Policy 6.5.4.

Policy 6.6.7 – Encourage measures that will reduce the number of vehicle miles traveled during peak periods, including the following examples of these types of measures:

- **Incentives for car-pooling and vanpooling.**
- **Preferential parking for car-pools and vanpools.**
- **An adequate, safe, and interconnected system of pedestrian and bicycle paths.**
- **Conveniently located bus stops with shelters that are connected to pedestrian/bicycle paths.**

In conformance with Policy 6.6.7, the Project has been designed to include a total of 27 parking spaces for clean air/van pool, which would encourage car-pooling and vanpooling. The Project also would retain the existing bicycle lane along the site's frontage with Arrowhead Avenue, consistent with Figure PRT-2 of the City's General Plan, and the Project would retain the existing sidewalk along the Project's frontages with Arrowhead Avenue, Rialto Avenue, and Sierra Way. Thus, the Project would be consistent with General Plan Policy 6.6.7.

b. Would the Project conflict with or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Determination: Less-than-Significant Impact.

Impact Analysis

Changes to the State CEQA Guidelines were adopted in December 2018, which requires all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the new measure for identifying transportation impacts for land use projects. This Statewide mandate went into effect July 1, 2020. To aid in this transition, the Governor's Office of Planning and Research (OPR) released a *Technical Advisory on Evaluating Transportation Impacts in CEQA*, dated December 2018 (herein, "Technical Advisory"). Based on OPR's Technical Advisory, the City of San Bernardino has adopted their *City of San Bernardino Traffic Impact Analysis Guidelines*, dated August 2020 (herein, "City Guidelines"). The adopted City Guidelines have been utilized to prepare this VMT analysis. (Urban Crossroads, 2022, p. 1)

Under the City Guidelines, projects are required to be evaluated by available screening criteria based on their location and project type to determine if a presumption of a less-than-significant transportation impact can be made. Based on the analysis presented in the Project's VMT Analysis (*Technical Appendix J1*), the Project does not meet any of the VMT screening criteria, and as such a Project-level VMT analysis was prepared to assess the Project's potential impact to VMT. Provided below are the results of the analysis. (Urban Crossroads, 2022, pp. 1-3)

VMT Modeling

The City Guidelines identify San Bernardino Transportation Analysis Model (SBTAM) as the appropriate tool for conducting a VMT analysis for land use projects in San Bernardino County. SBTAM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment. The calculation of VMT for land use projects is based on the total number of trips generated and the average trip length of each vehicle. SBTAM also is consistent with the model used to develop the City's VMT impact thresholds listed by the City Guidelines. Therefore, the vehicle trips and average daily trip length for project-related vehicle trips are model derived from SBTAM. (Urban Crossroads, 2022, pp. 3-4)

VMT Metric and Significance Thresholds

The City Guidelines describe that Project-generated VMT should be extracted from the origin-destination (OD) trip matrix from the SBTAM travel demand model and include total VMT for all vehicle trips (i.e., passenger cars and trucks) and trip purposes, and include the calculation of total VMT per service population (population plus employment). The City Guidelines have identified the following recommended thresholds: (Urban Crossroads, 2022, p. 4)

1. The baseline project-generated VMT per service population exceeds the City of San Bernardino General Plan Buildout VMT per service population, or
2. The cumulative project-generated VMT per service population exceeds the City of San Bernardino General Plan Buildout VMT per service population.

Project Land Use Conversion

In order to evaluate Project VMT, standard land use information must first be converted into a SBTAM compatible dataset. The SBTAM model utilizes socio-economic data (SEO) (e.g., population, households, employment, etc.) instead of land use information for the purposes of vehicle trip estimation. Project land use information such as building square footage must first be converted to SEO for input into SBTAM. Adjustments in SEO have been made to the appropriate TAZ within the SBTAM model to reflect the Project's proposed land uses (i.e., manufacturing/business park). Table 3-3 (previously presented in subsection 3.2.2) summarizes the employment estimates for the Project. It should be noted that the employment estimates are consistent with the employment density factors identified in the SCAG *Employment Density Study* (October 2001). (Urban Crossroads, 2022, p. 4)

Project Total VMT Calculation

Consistent with City Guidelines and standard VMT calculation methods, total VMT is calculated from SBTAM's OD trip matrices and then divided by a project's service population (SP) to derive the VMT efficiency metric VMT per SP (Urban Crossroads, 2022, p. 4).

Table 4-28, *Total Project VMT*, presents Project-generated total VMT calculated as the total of passenger car, light-duty, medium-duty, and heavy-duty truck trips. Total trips by vehicle type are then multiplied by the average trip length for each vehicle type. (Urban Crossroads, 2022, p. 4)

Table 4-28 Total Project VMT

	Baseline (2022)	Cumulative Year (2040)
Automobile VMT	4,824	4,348
Truck VMT	3,253	3,290
Total VMT	8,077	7,638

(Urban Crossroads, 2022, Table 2)

Table 4-29, *Project-Generated Total VMT per SP*, presents the calculation of VMT per SP, which is simply the product of total VMT for the Project divided by the Project's SP or in this case the number of Project employees (Urban Crossroads, 2022, p. 5).

Table 4-29 Project-Generated Total VMT per SP

	Baseline (2022)	Cumulative Year (2040)
SP	260	260
Total VMT	8,077	7,638
Total VMT / SP	31.1	29.4

(Urban Crossroads, 2022, Table 3)

Table 4-30, *Project Comparison to City of San Bernardino VMT per SP Significance Threshold*, identifies the comparison between Project's baseline and cumulative VMT per SP to the City's impact threshold. As noted in the City Guidelines, the City of San Bernardino has identified a VMT per SP significance threshold of 31.6, which is the VMT associated with City of San Bernardino General Plan Buildout. As the proposed Project's baseline is 2022, the City's impact threshold has been interpolated to reflect the correct baseline year. As shown in Table 4-30, the Project would not exceed the City's VMT per SP impact threshold under either baseline or cumulative conditions, as the Project would be below the identified baseline and cumulative thresholds by 1.6% and 7.0%, respectively. The Project's impacts due to VMT would therefore be less than significant. (Urban Crossroads, 2022, p. 5)

Table 4-30 Project Comparison to City of San Bernardino VMT per SP Significance Threshold

	Baseline	Cumulative
Regional Threshold	31.6	31.6
Project	31.1	29.4
Percent Below Threshold	-1.6%	-7.0%
Potentially Significant?	No	No

(Urban Crossroads, 2022, Table 4)

Project Cumulative Impact on VMT

The City Guidelines consistent with the Technical Advisory states that cumulative impacts on VMT "… metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less-than-significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impact that utilize plan compliance as a threshold of

significance." As the Project is consistent with the RTP/SCS would have a less-than-significant impact at the Project level, the Project also is considered to have a less-than-significant cumulative impact. (Urban Crossroads, 2022, pp. 5-6)

Conclusion – VMT Impacts

Although the Project would not meet any of the City's described screening criteria, the Project-specific VMT analysis findings for Project-generated VMT per service population was found to be below the City's threshold by 1.6% for baseline and 7.0% for cumulative conditions. Therefore, the Project's impact due to VMT would be less than significant. (Urban Crossroads, 2022, p. 6)

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)?

Determination: Less-than-Significant Impact.

Impact Analysis

Project improvements would be limited to frontage improvements and no additional improvements would need to be made to any current or future intersections. Improvements proposed by the Project Applicant, which are limited to frontage improvements, are fully consistent with the City of San Bernardino General Plan Circulation Element. The Project's driveway access points along Arrowhead Avenue and Sierra Way also have been designed to provide for adequate spacing distance from the existing railroad tracks to the immediate south of the Project site. Additionally, the proposed Project would be compatible in transportation design with the existing land uses and roadway network in the surrounding area, and the Project would not create a transportation hazard as a result of an incompatible use. The Project's proposed driveways for truck trailers and passenger cars would connect directly to Arrowhead Avenue, Rialto Avenue and Sierra Way, and all improvements planned as part of the Project would be in conformance with applicable City of San Bernardino roadway standards. Accordingly, the Project would not result in any hazards due to a design feature and impacts would be less than significant.

d. Would the Project result in inadequate emergency access?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project is designed to include a total of five driveways providing access to the site from Arrowhead Avenue, Rialto Avenue, and Sierra Way. In addition, minimum 30-foot-wide fire lanes are proposed around each of the proposed buildings, except along the northern side of the buildings where adequate fire access would be accommodated by Rialto Avenue. During the course of the City of San Bernardino and San Bernardino County Fire Department's required review of the Project's applications, the Project's design is reviewed to ensure that adequate access to and from the site is provided for emergency vehicles during both construction and long-term operation. As part of the Project's application review process, and during subsequent review and approval processes for building permits, the City of San Bernardino and County of San Bernardino Fire Departments are responsible for reviewing the Project's application materials to ensure that appropriate emergency ingress and egress would be available to-and-from the Project Site and that the Project would not substantially impede emergency response times in the local area. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
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)? or	☐	☐	☐	☐
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe).	☐	☐	☐	☐

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

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

Determination: Less than Significant Impact with Mitigation Incorporated.

Impact Analysis

The City of San Bernardino complied with Native American consultation requirements by engaging in consultation with interested tribes. On January 5, 2023, the City sent AB 52 consultation letters to the Soboba Band of Luiseno Indians, Gabrieleño Band of Mission Indians – Kizh Nation, and the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians). On January 9, 2023, the Gabrieleño Band of Mission Indians – Kizh Nation responded requesting consultation and on January 12, 2023, the City responded to the consultation request. On January 13, 2023, the Gabrieleño Band of Mission Indians – Kizh Nation responded at which time they elected to defer consultation to the Serrano Tribe (San Manuel). On February 13, 2023, recommendations for mitigation were provided by the Yuhaaviatam of San Manuel Nation. No additional consultation was requested. No response was received by the Soboba Band of Luiseno Indians.

Based on the results of the Project's CRA (*Technical Appendix C1*), no prehistoric Native American artifacts were noted during the archaeological field survey conducted by BFSA. The location of the property and the past disturbances at the Project site indicate the Project site is not a good candidate for the presence of buried Native American sites or features. As such, it is unlikely that prehistoric artifacts exist beneath the surface of the Project site. While no prehistoric cultural resources have been identified on or within the vicinity of the Project site, the early development of the property as an orchard and later a foundry could have affected the potential to identify prehistoric Native American resources on the surface of the property. Generally speaking, the City of San Bernardino has been identified by representatives of the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) and the Yuhaaviatam of San Manuel Nation as an area of tribal interest. Given the tribal interest in this general area and the potential that prehistoric Native American artifacts or sites could be encountered during trenching, the Project Applicant shall allow for monitoring of excavations on site by the Yuhaaviatam of San Manuel Nation as part of the ATP required pursuant to Mitigation Measure CR-1. With implementation of Mitigation Measure CR-1, including the requirement to allow for Native American monitoring during site excavation activities, implementation of the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource.

Mitigation

Mitigation Measure CR-1 shall apply.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*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?	☐	☐	☒	☐

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project would be connected to existing water, wastewater conveyance and treatment, storm water drainage, electric power, natural gas, and telecommunications facilities, and these facilities are available within the immediately surrounding area. Such local connections are inherent to the Project's construction phase, and impacts associated with the Project's construction phase have been evaluated throughout this MND under the appropriate topical subheadings. There are no components of the Project's proposed utility connections that would result in significant environmental effects beyond what already will be evaluated by this MND for the Project's construction phase. The SBMWD issued a service letter for the Project on November 8, 2021, indicating that SBMWD has the capacity to service the Project with water service from existing lines located in Rialto Avenue, Arrowehad Avenue, and Sierra Way (SBMWD, 2021). The SBMWD issued a service letter for the Project on August 16, 2023, indicating that SBMWD has the capacity to service the Project with sewer service from existing lines located in Rialto Avenue, Arrowhead Avenue, and Sierra Way . Dry utility connections are site adjacent. Therefore, impacts 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?

Determination: Less-than-Significant Impact.

Impact Analysis

The operation of three manufacturing/business park buildings on the Project site would result in an increase in potable water demand compared to the site's existing, largely vacant condition. The Project Site is designated by the City of San Bernardino General Plan for development with "Commercial Heavy (CH)" land uses. The Project Site's existing General Plan land use designations were utilized in part to inform growth projections published by SCAG, which in turn were used as inputs in the 2020 San Bernardino Valley Regional Urban Water Management Plan (RUWMP). The 2020 UWMP demonstrates that member agencies within the San Bernardino Valley Municipal Water District service area, which includes the City of San Bernardino Municipal Water Department (SBMWD), would be served with adequate water resources during normal, wet, dry, and multiple dry years to meet the demands associated with projected growth in residents and employment through at least 2045. The Project as designed is consistent with the Project site's underlying General Plan land use designation of "Commercial Heavy (CH)," and also is consistent with the site's underlying zoning classification of "CH (Commercial Heavy)." Because the Project's land uses are consistent with the land use inputs utilized in the 2020 RUWMP, and because the 2020 RUWMP demonstrates that there would be adequate water resources to meet the projected demands through 2045, there is substantial evidence to conclude that the SBMWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Accordingly, impacts 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?

Determination: Less-than-Significant Impact.

Impact Analysis

Wastewater generated on the Development Site would be conveyed to the San Bernardino Water Reclamation Plant (SBWRP). The SBWRP has an existing permitted design capacity of 33 million gallons per day (MGD). According to the 2019 Sewer Master Plan Update prepared for the San Bernardino Municipal Water Department (SBMWD), and based on water to wastewater ratios, general plan land use designations, and the estimated 2060 water demand projections, it is estimated that the total wastewater demand within the SBMWD service area will reach 33.81 MGD by 2060 (SBMWD, 2020a, p. ES-2). Thus, existing and planned developments, including the proposed Project, ultimately would exceed the existing wastewater treatment capacity at the SBWRP. However, this projected shortfall in wastewater treatment capacity has been known for a long time and was documented in the EIR prepared for the City's 2005 General Plan Update. Furthermore, the manufacturing/business park use proposed as part of the Project would be fully consistent with the site's existing General Plan land use designation of CH, and the SBMWD utilizes growth projections from local area general plans in its projections of future wastewater treatment demand. The SBMWD prepared a Water Reclamation Plant Facilities Assessment and Master Plan (WRPMP) for the planning period 2020-2040, which evaluates projected wastewater treatment demands and identifies efficiency and capacity upgrades needed to accommodate existing and planned demands for wastewater treatment throughout the SBMWD service area (SBMWD, 2020b). Planned improvements include efficiency projects and expansion. Because the SBMWD is undertaking long-range planning efforts to ensure adequate capacity exists to provide wastewater treatment for all existing and planned developments in its service area, including the Project, it can be concluded that the Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the

Project's projected demand in addition to existing commitments. Therefore, impacts would be less than significant.

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?

Determination: Less-than-Significant Impact.

Impact Analysis

Solid waste collection within much of the City of San Bernardino is provided by the Solid Waste Services and Refuse and Recycling Division of the City of San Bernardino Department of Public Services. The County of San Bernardino Solid Waste Management Division (SWMD) is responsible for the operation and management of the solid waste disposal system which consists of six regional landfills, eight transfer stations, and five community collection centers. The City of San Bernardino has no active landfills but primarily utilizes the San Timoteo and Mid-Valley landfills. According to the EIR prepared for the City of San Bernardino 2005 General Plan Update, businesses (including the manufacturing/business park uses proposed as part of the Project) generate approximately 2.37 tons per employee per year. (San Bernardino, 2005b, pp. 5.15-16 and Table 5.15-5) As previously indicated in MND subsection 3.2.2, the Project is anticipated to generate approximately 327 new, recurring jobs. Thus, the Project would generate approximately 775.0 tons per year (tpy), or 2.1 tons per day (tpd), of solid waste requiring disposal at the San Timoteo and/or Mid-Valley landfills (327 employees x 2.37 tpy/employee = 775.0 tpy; 775.0 tpy ÷ 365 days/year = 2.1 tpd). The San Timoteo Landfill is permitted to receive up to 2,000 tons per day, but is allowed a maximum tonnage of 3,000 tpd for up to 15 days per calendar year to accommodate for waste diversion from Mid-Valley on high wind events. In April 2023 (the most recent month for which tonnage is available), the peak daily tonnage received at the San Timoteo Landfill was 1,779.4 tons. (CalRecycle, 2023a). In the month of April 2023, the Mid-Valley landfill had a peak tonnage of 4,498.17 tons, while this facility is permitted to receive up to 7,500 tpd (CalRecycle, 2023b). Thus, the 2.1 tpd that would be generated by the Project would represent 0.95% of the available daily disposal capacity at the San Timoteo Landfill, based on the April 2023 peak daily amount of 1,779.4 tons (2,000 tpd - 1,779.4 tons = 221.0 tons available capacity; 2.1 tpd ÷ 221.0 x 100 = 0.95%). The Project's 2.1 tpd also would represent 0.07% of the available daily disposal capacity at the Mid-Valley Landfill, based on the April 2023 peak daily amount of 4,498.17 tons (7,500 tpd – 4,498.17 tons = 3,001.83 tons available capacity; 2.1 tpd ÷ 3,001.83 tons x 100 = 0.07%). Accordingly, adequate capacity exists at both the San Timoteo and Mid-Valley landfills to accommodate solid waste generated by the Project. In addition, while the Project would generate solid waste during construction activities, the amount of solid waste anticipated during construction would be less than is anticipated under long-term operations on a daily basis. Furthermore, although the Project site contains contaminated soils under existing conditions, these soils are proposed to be remediated through excavation and export of the contaminated soils to a facility in City of Sunshine, Arizona, which is authorized for the disposal of contaminated soils. Additionally, the Project would be subject to the City of San Bernardino's solid waste regulations as set forth in Chapter 8.24 of the City of San Bernardino's Municipal Code. Chapter 8.24 includes enforceable requirements for the recycling and diversion of solid waste from the regional landfills. With mandatory compliance with Chapter 8.24 of the City of San Bernardino's Municipal Code, the Project would not 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. Impacts 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?

Determination: Less-than-Significant Impact.

Impact Analysis

The Project would be required to comply with the City of San Bernardino's waste reduction programs, including recycling and other diversion programs to reduce the amount of solid waste deposited in landfills. As such, future building users would be required to work with refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project would be required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. The implementation of these programs would reduce the amount of solid waste generated and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would be subject to all federal, State, and local statutes and regulations related to solid waste. As such, a less-than-significant impact would occur.

4.20 WILDFIRE

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

a. If located in or near a state responsibility area or lands classified as very high fire hazard severity zone would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Determination: No Impact.

Impact Analysis

A State Responsibility Area (SRA) includes lands where the State of California is financially responsible for the prevention and suppression of wildfires. According to mapping information from the California Department of Forestry and Fire Protection (CalFire), the Project site and surrounding areas are identified as being located within a "Local Responsibility Area (LRA)." The nearest lands that are within an SRA occur approximately 3.8 miles south of the Project site. (CalFire, n.d.) Additionally, according to CalFire's Fire Hazard Severity Zone Viewer, the Project site and surrounding areas are not subject to wildland fire hazards (CalFire, n.d.). Fire protection services to the Project Site are and would continue to be provided by the San Bernardino County Fire Department (SBCFD). The Project Site is not identified as part of any adopted emergency response plans or emergency evacuation plans, and the Project has no potential to conflict with any such plans. As such, no impacts to adopted emergency response plans or emergency evacuation plans would occur with implementation of the proposed Project.

b. If located in or near a state responsibility area or lands classified as very high fire hazard severity zone 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?

Determination: No Impact.

Impact Analysis

As indicated above under the analysis of Threshold a, the Project site and surrounding areas are not located within an SRA, and the Project site and vicinity are not subject to wildland fire hazards (CalFire, n.d.; CalFire, n.d.). As such, the Project has no potential to exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur.

c. If located in or near a state responsibility area or lands classified as very high fire hazard severity zone 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?

Determination: No Impact.

Impact Analysis

As indicated above under the analysis of Threshold a., the Project site and surrounding areas are not located within an SRA, and the Project site and vicinity are not subject to wildland fire hazards (CalFire, n.d.; CalFire, n.d.). As such, the Project would not 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, and no impact would occur.

d. If located in or near a state responsibility area or lands classified as very high fire hazard severity zone 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?

Determination: No Impact.

Impact Analysis

As indicated above under the analysis of Threshold a., the Project site and surrounding areas are not located within an SRA, and the Project site and vicinity are not subject to wildland fire hazards (CalFire, n.d.; CalFire, n.d.). As such, the Project would not 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, and no impact would occur.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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?

Determination: Less-than-Significant Impact with Mitigation Incorporated.

Impact Analysis

As indicated throughout the analysis in this IS/MND (refer specifically to IS/MND subsections 4.4, 4.5, and 4.18), assuming incorporation of the mitigation measures identified herein, implementation of the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habit of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or 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. Therefore, with mitigation, impacts would be less than significant.

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)?

Determination: Less-than-Significant Impact with Mitigation Incorporated.

Impact Analysis

Cumulative effects that would result from implementation of the Project have been evaluated throughout this MND, which concludes that such impacts would not occur, would be less than significant, or would be reduced to below a level of significance with the incorporation of mitigation measures identified herein and included in the Project's conditions of approval. For example, for the issue of Air Quality (MND subsection 4.3), the SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively-considerable air quality impact. Thus, the analysis of the Project's air quality impacts inherently addresses potential cumulatively-considerable air quality impacts, and shows that Project-related cumulatively-considerable impacts to air quality would be less than significant. The analysis of Greenhouse Gas (GHG) emissions in MND subsection 4.8 is inherently a cumulative analysis as the proposed Project has no potential to directly contribute to Global Climate Change (GCC). As indicated in the analysis, because the Project's emissions would be below the SCAQMD's draft threshold of 3,000 $MTCO_2e$/year, the Project's impacts due to GHG emissions would be less than significant on a cumulatively-considerable basis. Additionally, the analysis of transportation-related noise in MND subsection 4.13 includes potential traffic-related noise impacts under Horizon Year 2040 conditions, which accounts for buildout of the City's General Plan and demonstrates that the Project would not result in any cumulatively-considerable impacts due to traffic-related noise. The analysis of the Project's potential impacts due to VMT in MND subsection 4.17 demonstrates that the Project would not exceed the City's VMT per SP impact threshold for under cumulative conditions, resulting in a less-than-significant impact. Accordingly, with the incorporation of mitigation measures identified herein and included in the Project's conditions of approval, the Project would not have impacts which are individually limited, but cumulatively considerable.

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

Determination: Less-than-Significant Impact with Mitigation Incorporated.

Impact Analysis

The Project's potential to result in substantial adverse effects on human beings has been evaluated throughout this MND (e.g., Air Quality, Geology/Soils, Noise, etc.). Where potentially significant impacts are identified, mitigation measures have been identified to reduce these adverse effects to the maximum feasible extent. For example, the analysis in MND subsection 4.3 demonstrates that the Project would not expose any sensitive receptors to substantial pollutant concentrations, and provides substantial evidence that the Project's cancer and non-cancer health risk impacts from diesel particulate matter emissions would be less than significant. There are no components of the proposed Project that could result in substantial adverse effects on human beings that are not already evaluated and disclosed throughout this MND. Accordingly, no additional impacts would occur.

5.0 References

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6.0 Mitigation Monitoring and Reporting Program

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
4.4 Biological Resources				
The Project site is identified as a potential nesting site for avian species that are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5 to 3513. The taking or disturbance of a protected species individual, their egg(s), or their nest is prohibited. Implementation of the required mitigation would reduce Project impacts to less-than-significant levels	Less Than Significant with Mitigation	**MM BR-1**: Vegetation-clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1st through August 31st), unless a migratory bird nesting survey is completed in accordance with the following requirements: a) A ground nesting bird survey shall be conducted on the Project site by a qualified biologist within 14 days prior to initiating vegetation clearing or ground disturbance. The survey shall consist of full coverage of the proposed disturbance limits, determined by the biologist and taking into account the species nesting in the area and the habitat present. If no active nests are found, no additional measures are required. b) If the survey identifies the presence of active ground nests, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near fledging) recorded. The biologist shall establish a no-disturbance buffer around each active nest (typically no less than 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors). The buffer area shall be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. The approved buffer zone shall be marked in the field	Project Construction Contractor; Project Applicant; Project Biologist/City of San Bernadino Planning Department	Prior to initiation of construction activities and as needed throughout the construction period.

Potential Environmental Impact	Significance Determination	Mitigation Measure	Responsible/ Monitoring Parties	Implementation Stage
		with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist with City concurrence verify that the nests are no longer occupied and/or juvenile birds can survive independently from the nests.		
4.5 Cultural Resources				
While no historically significant elements of the historic site were exposed, results of the archaeological testing and significance evaluation indicate that the potential to discover additional historic deposits on the property is high, and some of those features may not have been affected by past demolition and, therefore, could contain significant historical data. This is evaluated as a potentially significant impact.	Less Than Significant with Mitigation	**MM CR-1**: Prior to issuance of grading permits, the City of San Bernardino shall condition the Project to require implementation of the Project's approved Archaeological Test Plan (ATP), a draft of which is included as Appendix F to the Project's Cultural Resources Study (CRS), which is included as Technical Appendix C1 to the Project's Initial Study/Mitigated Negative Declaration (MND). The required ATP shall include details regarding research design as well as a plan for testing and recordation of any resources that may be uncovered. The ATP shall require that any surface artifacts exposed by earthwork or trenching shall be mapped, recorded, and collected. The ATP also shall require the excavation of mechanical trenches at locations determined to have a high potential for historic deposits. Mechanical trenching shall serve to identify the composition of any subsurface archaeological deposits encountered, and the trenches shall be placed in or near areas of estimated historic deposit locations. If the trenching program identifies intact and potentially significant historic or prehistoric deposits, the ATP shall require a more focused investigation. Furthermore, the ATP shall require that if archaeological features or deposits are discovered, the discovery shall be recorded, and Department of Parks and Recreation (DPR) forms shall be registered at the South Central Coastal	Project Applicant, Project Archaeologist/ City of San Bernardino Planning Department	Prior to issuance of grading permits, during excavation and grading activities, and prior to final grading inspection

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		Information Center (SCCIC) at CSU Fullerton. Additionally, all subsurface investigations and ground-disturbing activities at the Project site shall be monitored by Native American representatives from either the Kizh Nation or the Yuhaaviatam of San Manuel Nation, at the City's discretion. Finally, all information gathered from the fieldwork, laboratory analysis, and research shall be incorporated into a technical report following City of San Bernardino guidelines and requirements, which shall be reviewed and approved by the City prior to final grading inspection.		
4.7 Geology and Soils				
Based on the existence of late Holocene young axial-channel deposits at the Project site and the lack of any known fossil specimens or fossil localities from within a several-mile radius encompassing the Project site, paleontological monitoring is not necessary during earth disturbance activities at the Project site. However, a significant impact could occur in the unlikely event that fossils of any sort are discovered during grading and earthmoving activities. In the event that fossils are uncovered during grading and earthmoving activities, then Mitigation Measure MM GEO-1 would apply, which would reduce potential impacts to less-than-significant levels.	Less Than Significant with Mitigation	**MM GEO-1:** Prior to grading permit issuance, the City of San Bernardino shall verify that the following applicable notes are included on the grading plans. Project contractors shall be required to ensure compliance with these notes and permit periodic inspection of the construction site by City of San Bernardino staff or its designee to confirm compliance. These notes also shall be specified in bid documents issued to prospective construction contractors. 1. If paleontological resources are discovered during earth disturbance activities, the discovery shall be cordoned off with a 100-foot radius buffer so as to protect the discovery from further potential damage, and a county or city-qualified paleontologist shall be consulted to assess the discovery. If the discovery is determined to be significant by the paleontologist, a Mitigation Monitoring and Reporting Program (MMRP) shall be initiated, which shall include	Project Construction Contractor; Project Applicant; Qualified Professional Paleontologist /City of San Bernardino Planning Department	In the event that paleontological resources are discovered during earth disturbance activities

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		notification of appropriate personnel involved and monitoring of earth disturbance activities: a. Monitoring of mass grading and excavation activities in areas identified as likely to contain paleontological resources shall be performed by a qualified paleontologist or paleontological monitor. Monitoring shall be conducted full-time in areas of grading or excavation in undisturbed sedimentary deposits. b. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery. c. Paleontological salvage during trenching and boring activities is typically from the generated spoils and does not delay the trenching or drilling activities. Fossils shall be collected and placed in cardboard flats or plastic buckets and identified		

Potential Environmental Impact	Significance Determination	Mitigation Measure	Responsible/ Monitoring Parties	Implementation Stage
		by field number, collector, and date collected. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place. On mass grading projects, discovered fossil sites shall be protected by flagging to prevent them from being overrun by earthmovers (scrapers) before salvage begins. Fossils shall be collected in a similar manner, with notes and photographs being taken before removing the fossils. Precise location of the site shall be determined with the use of handheld GPS units. If the site involves remains from a large terrestrial vertebrate, such as large bone(s) or a mammoth tusk, that is/are too large to be easily removed by a single monitor, a fossil recovery crew shall excavate around the find, encase the find within a plaster and burlap jacket, and remove it after the plaster is set. For large fossils, use of the contractor's construction equipment may be solicited to help remove the jacket to a safe location. d. Isolated fossils shall be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes shall be taken on the map location and stratigraphy of the site, which is photographed before it is vacated, and the fossils are removed to a safe place.		

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		e. Particularly small invertebrate fossils typically represent multiple specimens of a limited number of organisms, and a scientifically suitable sample can be obtained from one to several five-gallon buckets of fossiliferous sediment. If it is possible to dry screen the sediment in the field, a concentrated sample may consist of one or two buckets of material. For vertebrate fossils, the test is usually the observed presence of small pieces of bones within the sediments. If present, as many as 20 to 40 five-gallon buckets of sediment can be collected and returned to a separate facility to wet-screen the sediment. f. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth. g. In the laboratory, individual fossils shall be cleaned of extraneous matrix, any breaks shall be repaired, and the specimen, if needed, shall be stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).		

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		h. Recovered specimens shall be prepared to a point of identification and permanent preservation (not display), including screen-washing sediments to recover small invertebrates and vertebrates. Preparation of individual vertebrate fossils is often more time-consuming than for accumulations of invertebrate fossils. i. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., the San Bernardino County Museum) shall be conducted. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities. Prior to curation, the lead agency (e.g., the City of San Bernardino) shall be consulted on the repository/museum to receive the fossil material. j. A final report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to, and accepted by, the appropriate lead agency, shall signify satisfactory completion of the Project program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might		

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		have been lost or otherwise adversely affected without such a program in place.		
4.9 Hazards and Hazardous Materials				
Based on the existing conditions at the Project site, there is a potential for contaminated soils on site to present a hazard to the public or the environment during site grading and ground-disturbing activities. Additionally, soil vapor intrusion has the potential to adversely affect future occupants of the proposed buildings. Impacts would be significant prior to mitigation. Mitigation Measure HM-1 has been identified to require implementation of the approved SMP under the oversight of the DTSC, which would require appropriate remediation of on-site soils in accordance with all applicable federal, State, and local requirements. Mitigation Measure HM-2 requires the design and installation of a vapor mitigation system beneath each of the proposed buildings in order to attenuate the presence of VOCs within soil gas. Implementation of the required mitigation would reduce potential impacts due to existing site contamination to below a level of significance.	Less Than Significant with Mitigation Incorporated	**MM HM-1:** Prior to grading permit issuance, the City of San Bernardino shall condition the Project to require compliance with the Project's Soil Management Plan (SMP) (Technical Appendix G3 to the Project's Mitigated Negative Declaration [MND]) which was prepared by Hazard Management Consulting (HMC), dated February 6, 2023, and approved by the California Department of Toxic Substances Control (DTSC) on February 13, 2023. The condition of approval also shall require the Project Applicant to provide appropriate notification to the Department of Toxic Substances Control (DTSC) prior to commencement of ground-disturbing activities. As part of soil remediation efforts on site, and prior to the start of grading activities, all soil with known commercial human health impacts found within the grading and re-compaction zone exceeding the action level concentrations identified in Table 1 of the SMP shall be removed and disposed of at an appropriate offsite facility in accordance with the property's Land Use Covenant (LUC). Grading operations shall be monitored by an Environmental Field Coordinator (EFC) visually and with the appropriate monitoring equipment (e.g. a organic vapor analyzer [OVA] or a handheld x-ray fluorescence [XRF]) to assess potential for and conduct testing of suspected contaminated soils above the action level concentrations identified in Table 2 of the SMP. The procedures identified in the SMP under "Unanticipated Environmental Conditions" shall be followed if	Project Construction Contractor; Project Applicant/City of San Bernardino; DTSC	Prior to grading permit issuance

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		unanticipated environmental conditions are encountered, including unusual odors, sustained elevated OVA readings (greater than 25 ppm), elevated XRF reading (greater than 5 times STLC screening level for the metals of concern), pH less than 2, unusual staining or discoloration, or other characteristics judged by the EFC to be not representative of previously assessed Site conditions. If elevated concentrations of lead are encountered, that soil shall be segregated and analyzed for the soluble fraction to assess whether that soil can be used as fill or must be removed from the Project site. As part of the grading efforts, South Coast Air Quality Management District (SCAQMD) Rules 1166 (VOCs) and 1466 (Metals) also shall apply. A final report shall be prepared which shall provide a summary of the work conducted, results of confirmation sampling and will contain copies of all daily field logs including all OVA and XRF monitoring results, laboratory results, and manifests used to dispose of soil from the Project site. Prior to final grading inspection, the Project Applicant shall provide evidence to the City of San Bernardino demonstrating that these requirements have been completed to the satisfaction of the City of San Bernardino, the County of San Bernardino, and DTSC.		
		MM HM-2: Prior to building permit issuance, the City of San Bernardino shall condition the Project to require the design and installation of a vapor mitigation system beneath each of the proposed buildings in order to attenuate the presence of VOCs within soil gas. The required vapor mitigation system shall be depicted on the building plans and shall be in place prior to issuance of	Project Construction Contractor; Project Applicant/City of San Bernardino	Prior to building permit issuance and prior to occupancy permit issuance

POTENTIAL ENVIRONMENTAL IMPACT	SIGNIFICANCE DETERMINATION	MITIGATION MEASURE	RESPONSIBLE/ MONITORING PARTIES	IMPLEMENTATION STAGE
		occupancy permits for each of the proposed buildings.	Planning Department; DTSC	