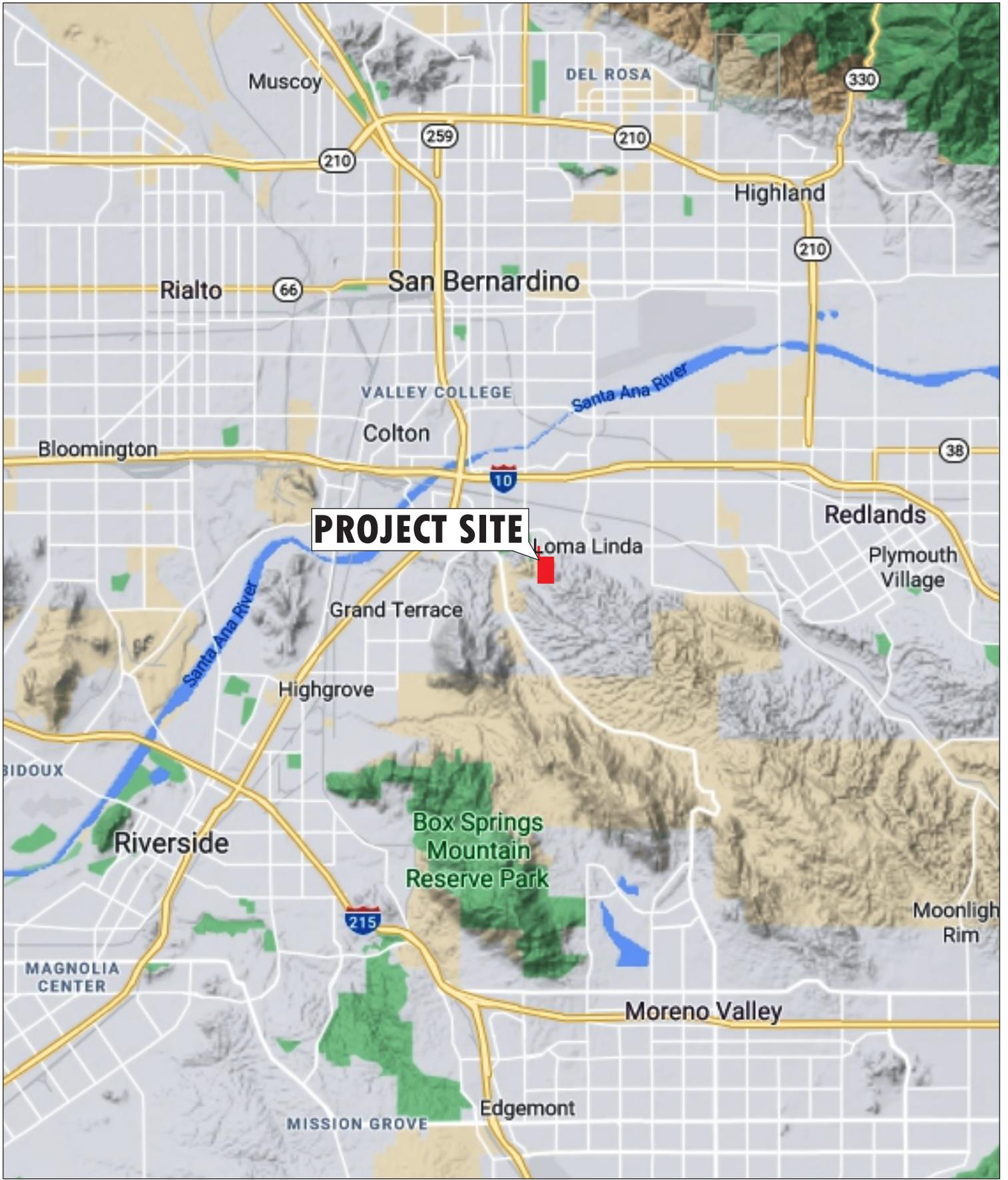


CITY OF Loma Linda
**ENVIRONMENTAL CHECKLIST FORM
AND INITIAL STUDY**

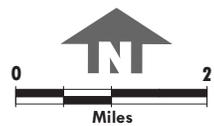
1. **Project Title:** Montecito Memorial Park Expansion
2. **Lead Agency Name and Address:**
City of Loma Linda
Community Development Department
25541 Barton Road
Loma Linda, CA 92354
3. **Contact Person and Phone Number:**
Lorena Matarrita
Associate Planner
(909) 799-2830
4. **Project Location:** The Project Site is located south of Barton Road between Oakwood Drive and Sierra Vista/Sage Drive.
5. **Project Sponsor's Name and Address:**
SCI Shared Resources, LLC
1929 Allen Parkway, 7th Floor
Houston, TX 77019
6. **General Plan Designation:** Low Density Residential
7. **Zoning:** Low Density Residential
8. **Project Description:**

The Applicant is requesting approval of a General Plan Amendment (GPA No. P20-171), Zone Change (ZC No. P20-170) and Conditional Use Permit (CUP No. P20-157) to allow for the proposed expansion of the existing Montecito Memorial Park, located at 3520 Washington Street in the City of Colton (see Figure 1-Regional Location and Figure 2-Project Vicinity). The Proposed Project includes the expansion of the existing cemetery to the east on an approximate 51-acre site (APNs: 0284-161-30 and 31) within the City of Loma Linda. The City of Loma Linda's approval of the requested GPA and ZC would change the existing land use designation and zoning from Low Density Residential and Single-Family Residential (R-1), respectively to Open Space. Cemeteries are conditionally permitted within the Open Space District.

Proposed improvements would occur on approximately 24.1 acres of the 51-acre site and would include a 10,259 square-foot mausoleum, two 3,035 square-foot mausoleums, a 2,301 square-foot administration building, shade/committal shelters, 20.14 acres of landscaping including burial lawns and cremation gardens, and approximately 4,160 linear feet of internal roadways. Proposed buildings and roadways would result in approximately 3.56 acres of impervious surface. The remaining 25.86 acres of the 51-acre Project Site would continue as natural open space. Proposed structures would be in keeping with the architecture and heights of the existing memorial park structures and would not exceed 24 feet in height. Primary access to the site



PROJECT SITE

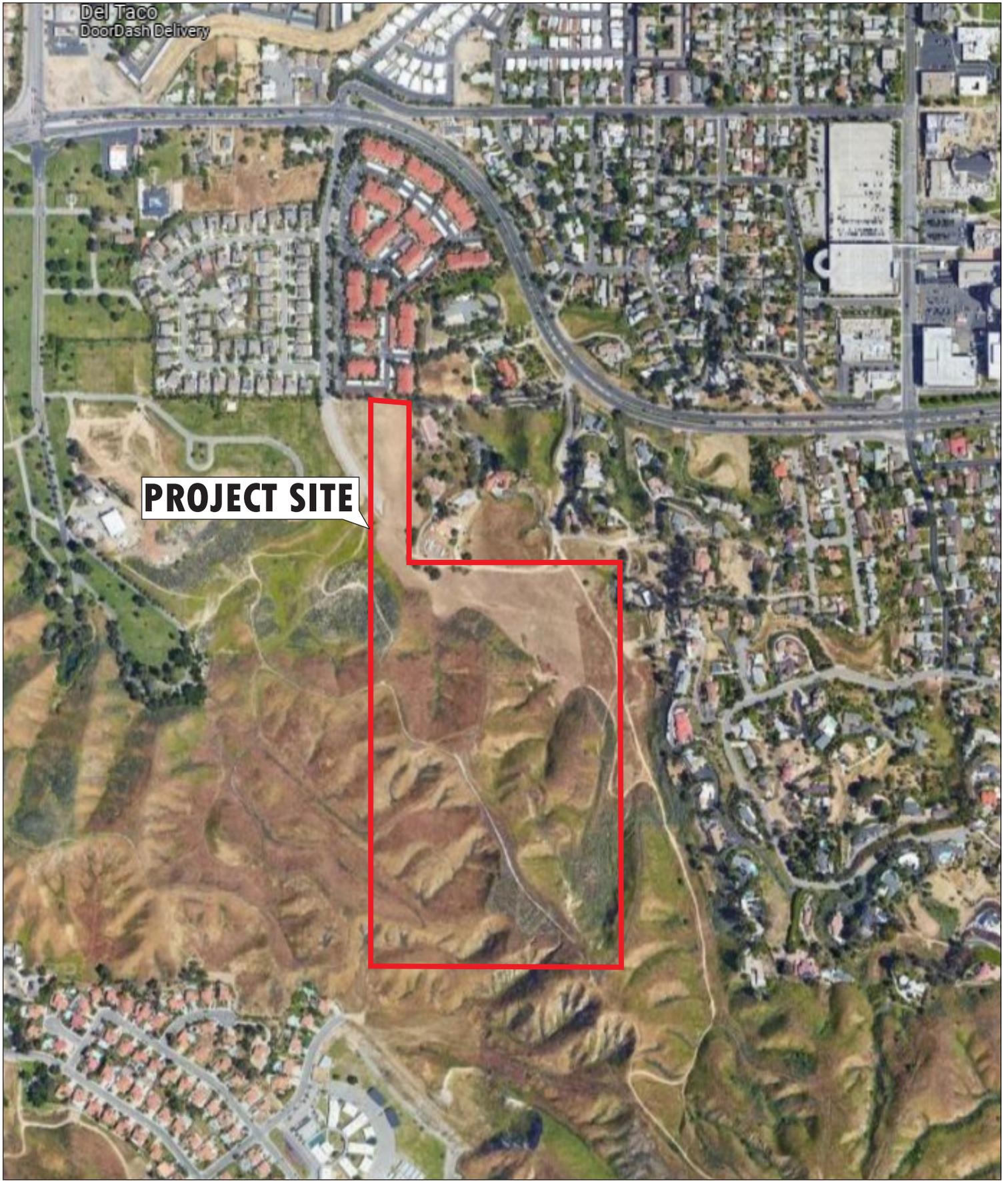


Source: Lilburn Corporation, November, 2020.

LILBURN
CORPORATION

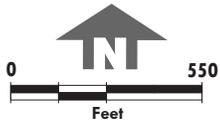
REGIONAL LOCATION
Montecito Memorial Park Expansion
Loma Linda, California

FIGURE 1



PROJECT SITE

PROJECT VICINITY
Montecito Memorial Park Expansion
Loma Linda, California



Source: Lilburn Corporation, November, 2020.

LILBURN
CORPORATION

FIGURE 2

would continue to be provided via Waterman Avenue. A new entry is also proposed from Oakwood Drive, an existing cul-de-sac within the jurisdiction of the City of Colton, that would be extended to allow for a second entry point that would be equipped with a security gate. An emergency fire access only point is also proposed from Sierra Vista Drive located east of Oakwood Drive and within the jurisdiction of the City of Loma Linda.

An Alquist-Priolo Fault Zone (AP Zone) occurs on the southern portion of the Project Site (refer to Figure 3 – Site Plan). Per State requirements, no habitable structures are proposed within 500-feet of the AP Zone.

9. Surrounding Land Uses and Setting:

Surrounding land uses include vacant land to the south, residential development to the north and east, and the existing Montecito Memorial Park to the west. Existing land use designation and zoning for the surrounding properties are presented in Table 1 below:

Table 1 Surrounding Land Uses, Designations and Zoning			
Location	Existing Land Use	Land Use Designation	Zoning
Project Site	Vacant land	Low Density Residential	Single-Family Residential (R-1)
North	Residential	Low Density Residential	Single-Family Residential (R-1)
South	Vacant land	Cemetery/School	Residential Estates - Reche Canyon Specific Plan (City of Colton)
East	Residential	Low Density Residential	Single-Family Residential (R-1)
West	Montecito Memorial Park	Cemetery	Residential Estates - Reche Canyon Specific Plan (City of Colton)

10. Other public agencies whose approval is required:

Regional Water Quality Control Board, Santa Ana Region - National Pollution Discharge Elimination System Permit

11. Related Technical Reports (incorporated by reference): The technical studies/reports referenced herein and listed in the References section at the end of this Initial Study were used to analyze the Project. All reports are available for review at the City of Loma Linda Community Development Department.

12. Evaluation Format: This Initial Study was prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. The format of the study is presented as follows. The project is evaluated based upon its effect on 21 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

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

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

1. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List mitigation measures).
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List the impacts requiring analysis within the EIR).

To ensure that the mitigation measures identified in the negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the measures it has imposed to mitigate or avoid significant environmental effects. In accordance with CEQA Section 15097 Mitigation Monitoring or Report, mitigation measures required as part of this Initial Study shall be made a part of the Mitigation Monitoring and Reporting Program.

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.

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

DETERMINATION

On the basis of this initial evaluation:

- () 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 Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standard 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 1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and 2) 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: 
Community Development Director

Date: 8-18-21

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 may be 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 "Earlier Analyses," as described in (5) below, 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:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) 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.
 - c) 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.
- 6) 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

EVALUATION OF ENVIRONMENTAL IMPACTS

Issues:

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

Impact Discussion:

a, c) **Less than Significant Impact.** The Project Site is currently vacant and consists of mostly sloped terrain. The Project Site does not contain any notable geological features and does not occur near a designated State Scenic Highway. Southeast of the Project Site is the Hillside Conservation Area. The area designated as “Hillside Conservation” on the Land Use Element Map is an important conservation area for the City and is characterized by natural, scenic hillsides, rough terrain and limited services constituting the highest ridgelines visible from the City. Upon approval of a General Plan Amendment and Zone Change, the land use designation/zoning of the Project Site would change from Low Density Residential to Open Space. Cemeteries are conditionally permitted within the Open Space District.

As stated in the City of Loma Linda’s Municipal Code, Section 17.44.040 Development Standards, which sets forth standards for development within a Special Purpose Zone, Open Space land use zoning designations have no maximum height standards, except as approved by the Conditional Use Permit.¹ Implementation of the Proposed Project would not disrupt views of the hillside or any other scenic vista identified by the City. The proposed shade shelters would be landscaped structures and the maximum structure height proposed is the mausoleum with a height of 24 feet. Furthermore, cemeteries are conditionally permitted within the Open Space land use designation. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

¹ <http://qcode.us/codes/lomalinda/> . Table 2-8.

- b) **No Impact.** The Project Site is not within or near a State designated or eligible Scenic Highway as identified by the Department of Transportation’s State Scenic Highway Program. The nearest Scenic Highway is Route 38 that begins approximately 4.5 miles northeast of the Project Site. No impacts are identified or anticipated and no mitigation measures are required.
- d) **Less than Significant Impact.** The proposed memorial park expansion would include nighttime lighting and interior lighting. Loma Linda Municipal Code Section 17.44.030 Specific use regulations, sub-section (3) states that lighting shall be stationary, directed away from adjacent properties and public rights-of-way, and of an intensity that is consistent with existing lighting in the neighborhood. Lighting that is used at the existing Montecito Memorial Park consists of shaded lighting for nighttime as well as post lighting that projects light only as far as a few feet out. Use of this lighting avoids light pollution that may affect adjacent properties and public rights-of-way. The proposed expansion is anticipated to use the same lighting and is consistent with the Loma Linda Municipal Code development standards for lighting in the Open Space land use zoning designation. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURAL AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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:</p>				
<p>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?</p>	()	()	()	(✓)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	()	()	()	(✓)
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	()	()	()	(✓)
d) Result in the loss of forest land or conversion of forest land to non-forest use?	()	()	()	(✓)
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	()	()	()	(✓)

Impact Discussion:

- a) **No Impact.** The Project Site occurs in an area identified by the California Department of Conservation’s Interactive Important Farmland Finder as “Grazing Land.”² Grazing Land is defined as land on which the existing vegetation is suited to the grazing of livestock. Grazing Land is not defined as prime farmland, unique farmland, or farmland of statewide importance. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- b) **No Impact.** The Project Site does not occur within or near land with a Williamson Act contract or agricultural use as shown on the United States Department of Agriculture Interactive Agricultural Resources Map.³ Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- c) **No Impact.** 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 would not be impacted by the Proposed Project as no rezoning from timberland to a non-timberland designation would result. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** No portion of the Project Site occurs within forest land, and the proposed expansion would not result in the loss of forest land or convert forest land to a non-forest use. No impacts are identified or anticipated and no mitigation measures are required.
- e) **No Impact.** Under the existing City of Loma Linda General Plan, there are no agricultural land use designations, although agriculture is an existing use in some areas

² <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed 11/5/20.

³ <https://www.arcgis.com/apps/webappviewer/index.html?id=fcb9bc427d2a4c5a981f97547a0e3688>. Accessed 11/5/20.

of the City. There are no forest lands within the City. The Proposed Project would not result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	()	()	(✓)	()
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	()	()	(✓)	()
c) Expose sensitive receptors to substantial pollutant concentrations?	()	()	(✓)	()
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	()	()	(✓)	()

Impact Discussion:

a, b) **Less than Significant Impact.** The Project Site occurs within the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality issues and regulations within the SCAB. The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the State and federal air quality standards. The most recent AQMP (AQMP 2016) was adopted by the SCAQMD on March 3, 2017. The 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from the 2016 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

The Project Site is located within the Low Density Residential land use/zoning designation and, upon approval of a General Plan Amendment and Zone Change, the Project Site would be within the Open Space land use/zoning designation. Cemeteries are a conditionally permitted use with the Open Space land use/zoning designation. Therefore, the emissions associated with the Proposed Project have already been accounted for in the AQMP and approval of the Proposed Project would not conflict with the AQMP.

The Proposed Project's construction and operational emissions were screened using California Emissions Estimator Model (CalEEMod) version 2016.3.2. The emissions incorporate Rule 402 and 403 by default as required during demolition and construction. The criteria pollutants screened for include: reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO₂), and particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, VOC and NO_x, are ozone precursors. Loma Linda is in non-attainment of State and federal standards for Ozone, Carbon Monoxide, Nitrogen Oxides, and Lead.

Construction Emissions

The estimated maximum daily construction emissions without mitigation are summarized in Table 2 and 3. Under the assumed scenarios, emissions resulting from the Proposed Project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant.

Table 2
Summer Construction Emissions Summary
(Pounds per Day)

Source/Phase	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Site Preparation	3.2	33.1	19.7	0.0	19.7	11.4
Grading	3.6	38.8	29.0	0.1	10.3	5.1
Building Construction	1.7	15.6	16.4	0.0	0.8	0.8
Paving	1.4	10.2	14.6	0.0	0.5	0.5
Architectural Coating	13.7	1.2	1.8	0.0	0.1	0.1
Highest Value (lbs./day)	13.7	38.8	29.0	0.1	19.7	11.4
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2016.3.2 Summer Emissions
Phases do not overlap and represent the highest concentration.

Table 3
Winter Construction Emissions Summary
(Pounds per Day)

Source/Phase	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
Site Preparation	3.2	33.1	19.7	0.0	19.7	11.4
Grading	3.6	38.8	29.0	0.1	10.3	5.1
Building Construction	1.7	15.6	16.4	0.0	0.8	0.8
Paving	1.4	10.2	14.6	0.0	0.5	0.5
Architectural Coating	13.7	1.2	1.8	0.0	0.1	0.1
Highest Value (lbs./day)	13.7	38.8	29.0	0.1	19.7	11.4
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod.2016.3.2 Winter Emissions.
Phases do not overlap and represent the highest concentration.

Compliance with SCAQMD Rules 402 and 403

Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}).

The Project Proponent would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP, which identifies Best Available Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but not be limited to the following:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
 - (a) The Project Proponent shall ensure that watering of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (two times daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
 - (b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.
 - (c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.
 - (d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

During construction, exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO_x and PM₁₀ levels in the area. Although the Proposed Project does not exceed SCAQMD thresholds during construction, the Applicant/Contractor would be required to implement the following conditions as required by SCAQMD:

2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
3. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.
4. The Project Proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.
5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.

6. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.
7. The operator shall comply with all existing and future California Air Resources Board (CARB) and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

Table 4 and Table 5 summarize the Proposed Project's daily regional emissions from on-going operations. During operational activity, the Proposed Project would not exceed any of the thresholds of significance. Thus, a less than significant impact would occur for Project-related operational-source emissions and no mitigation is required.

**Table 4
Summer Operational Emissions Summary
(Pounds per Day)**

Source	ROG/ VOC ¹	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.9	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	0.3	1.8	4.3	0.0	1.4	0.4
Total Value(lbs./day)	1.2	2.0	4.4	0.0	1.4	0.4
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod 2016.3.2, Summer Emissions

**Table 5
Winter Operational Emissions Summary
(Pounds per Day)**

Source	ROG/VOC ¹	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.9	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.2	0.1	0.0	0.0	0.0
Mobile	0.3	1.8	0.0	0.0	1.4	0.4
Total Value(lbs./day)	1.2	2.0	4.4	0.0	1.4	0.4
SCAQMD Threshold	55	55	550	150	150	55
Significance	No	No	No	No	No	No

Source: CalEEMod 2016.3.2, Winter Emissions

As demonstrated by the CalEEMod model, the Proposed Project would not exceed any applicable SCAQMD regional threshold either during construction or operational activities. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** SCAQMD has developed a methodology to assess the localized impacts of emissions from a Proposed Project as outlined within the Final

Localized Significance Threshold (LST) Methodology report; completed in June 2003 and revised in July 2008. The use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. According to SCAQMD LST methodology, LSTs would apply if the Proposed Project includes stationary sources or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site, such as industrial warehouse/transfer facilities. The Proposed Project does not involve any such sources and therefore, no long-term localized significant threshold analysis is warranted. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- d) **Less than Significant Impact.** Potential odor sources associated with the Proposed Project may result from construction activities including equipment exhaust and the application of asphalt and architectural coatings. Operational odor sources would include the temporary storage of domestic solid waste (refuse). Standard construction requirements (i.e., reduced idling, mufflers) would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. In accordance with the Municipal Code, project-generated refuse would be stored in covered containers and removed at regular intervals. The Proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	()	(✓)	()	()
b) Have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	()	()	()	(✓)
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	()	()	()	(✓)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	()	(✓)	()	()

Impact Discussion:

a, e, f) **Less than Significant with Mitigation Incorporated.** A Biological Resources Assessment (BRA), dated May 2021, was completed by Jennings Environmental, LLC. (Jennings) to identify vegetation communities, the potential for the occurrence of special status species, or habitats that could support special status wildlife species, and record all plants and animals observed or detected within the Project boundary (available at City offices for review). Additionally, the site was surveyed for any drainage features that would meet the definition of the Waters of the US (WOUS), Waters of the State (WOS), or California Department of Fish and Wildlife (CDFW) jurisdiction.

According to the California Natural Diversity Data Base (CNDDDB), 72 sensitive species, 20 of which are listed as threatened or endangered, and 5 sensitive habitats have been documented in the *San Bernardino South* and *Redlands* U.S. Geological Survey quadrangles. This list of sensitive species and habitats includes any State and/or federally listed threatened or endangered species, CDFW designated Species of Special Concern (SSC), and any “Special Animals”. “Special Animals” is a general term that refers to all of the taxa the CNDDDB is interested in tracking, regardless of their legal or protection status. This list is also referred to as the list of “species at risk” or “special status species.” The CDFW considers the taxa on this list to be those of greatest conservation need.

The burrowing owl (BUOW) is a state and federal SSC. The BUOW is heavily dependent upon the presence of mammal burrows, with ground squirrel burrows being a common choice, in its habitat to provide shelter from predators, inclement weather, and to provide a nesting place. They are also known to make use of human-created structures, such as cement culverts and pipes, for burrows. The breeding season for BUOW is February 1 through August 31. The BUOW is considered a migratory species in portions of its range, which includes western North America from Canada to Mexico, and east to Texas and Louisiana. BUOW populations in California are considered to be sedentary or locally migratory. The BUOW is not listed under the state or federal Endangered Species Act but is considered both a federal and state Species of Special Concern. The BUOW is a migratory bird protected by the international treaty under the Migratory Bird Treaty Act of

1918 and by State law under the California Fish and Game Code (CDFG Code #3513 & #3503.5). Although the site is partially disturbed, the conditions present on-site are marginally suitable for BUOW. The result of the survey was that no evidence of BUOW was found in the survey area. No burrows of appropriate size, aspect, or shape were located and no BUOW pellets, feathers, or whitewash were found. No burrowing owl individuals were observed. Although no BUOW individuals were observed on either survey date, the Project site and adjacent surrounding area does contain some habitat that would be considered suitable for BUOW. The Project Site and immediate surrounding areas contains habitat suitable for nesting birds. Possible significant adverse impacts have been identified or anticipated and Mitigation Measure BIO-1 is required to reduce impacts to a less than significant level.

The coastal California gnatcatcher (*Polioptila californica californica*) (CAGN) is the nominate and northernmost subspecies of CAGN. It is a small, non-migratory songbird (passerine) that occurs along the Pacific coastal regions of southern California and northern Baja California, Mexico. CAGN occur in or near coastal scrub vegetation communities. Much of the species' current range within the United States is now or is anticipated to be covered by large, regional Habitat Conservation Plans (HCPs) permitted under section 10(a)(1)(B) of the Endangered Species Act and under the State of California's Natural Community Conservation Planning (NCCP) Act. These regional plans have made substantive contributions to the species' conservation. During an initial site visit it was determined that the survey area contained suitable habitat for the CAGN. As such, Jennings obtained the services of a CAGN permitted biologist to conduct protocol level non-breeding season surveys to determine the presence or absence of this species. As indicated in the Final CAGN Survey Report, dated April 2021, that was completed by Mountainview Biological Consulting, three individual CAGNs were observed during the protocol surveys and an additional one individual CAGN was heard approximately 300 to 500 feet away. Because the CAGN was observed to be present on-site, the Project site is considered almost entirely located within Unit 10 of the Critical Habitat for the federally listed CAGN. As a condition of approval, Section 10 consultation with the USFWS is required to prevent unauthorized take of a listed species. The Applicant will submit an Incidental Take Permit Application to the U.S. Fish and Wildlife Service and notify the City of the timing for approval.

Additionally, to avoid potential impacts to bird species covered by the Migratory Bird Treaty Act, the following mitigation measure shall be implemented:

BIO 1: A nesting bird survey shall be conducted by a qualified biologist prior to any construction activities taking place, during the nesting season to avoid potentially taking any birds or active nests. In general, impacts to all bird species (common and special status) can be avoided by conducting work outside of the nesting season (generally March 15th to September 15th), and conducting a worker awareness training. However, if all work cannot be conducted outside of the nesting season, a project-specific Nesting Bird Management Plan shall be prepared to determine suitable buffers.

- b, c) **No Impact.** The Project area was surveyed with 100 percent visual coverage and no drainage features were present on-site. As such, the Project Site does not contain any wetlands, WOUS or WOS. The Project area was surveyed with 100 percent visual coverage and no definable bed or bank features exist on the Project Site. As such, the subject parcel does not contain any areas under CDFW jurisdiction. There are no

streams, channels, washes, or swales that meet the definitions of Section 1600 of the State of California Fish and Game Code (FGC) under the jurisdiction of the CDFW, Section 401 (“Waters of the State”) of the Clean Water Act (CWA) under the jurisdiction of the RWQCB, or “Waters of the United States” (WoUS) as defined by Section 404 of the CWA under the jurisdiction of the U.S. Army Corps of Engineers (Corps) within the subject parcel. Thus, there is no suitable riparian habitat on-site. No impacts are identified or anticipated and no mitigation measures are required.

- d) **No Impact.** Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas.

Local wildlife movement would be temporarily disrupted during the vegetation removal and construction processes, but this effect would be localized and short-term. Although the Proposed Project would result in the incremental loss of potential foraging and nesting bird habitat, the Project Site is located in an area that has been regionally isolated by surrounding industrial/commercial development. As concluded in the BRA, the Project Site does not provide for regional wildlife movement or serve as a regional wildlife corridor. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	()	(✓)	()	()
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5?	()	(✓)	()	()
c) Disturb any human remains, including those interred outside of formal cemeteries?	()	(✓)	()	()

Impact Discussion:

- a, b) **Less than Significant with Mitigation Incorporated.** A Phase I Cultural Resources Investigation, dated December 4, 2020, was completed by McKenna et al. (McKenna) for the Project Site and is available for review at the City of Loma Linda Community Development Department and is summarized herein. In compliance with the CEQA and the City of Loma Linda, the report included a field survey and a standard archaeological record search through the California State University, Fullerton, South Central Coastal Information Center. This research included a review of previously completed projects within one-mile of the Project Site; a review of the recorded cultural resources within one-mile of the Project Site; a review of listings for the National Register of Historic Places, the California Register of Historical Resources, California Landmarks, and

California Points of Historical Interest. Historic maps were also reviewed. McKenna also contacted the Native American Heritage Commission to inquire of any the presence/absence of sacred or religious sites in the vicinity of the Project Site. Letters were also sent to Native American representatives identified by the Commission, requesting information on any issues, concerns, or resources they may be aware of and requested written responses. At the request of the City of Loma Linda, McKenna et al. represented the City with respect to initial AB-52 consultation and submitted letters to interested tribes regarding the Project. A discussion of the consultation process related to Tribal Cultural Resources is provided in Section XVIII of this Initial Study.

Historic background research was completed through a review of the Bureau of Land Management, General Land Office Records, the San Bernardino County Assessor's Office, the San Bernardino County Archives, and the McKenna et al. in-house library. Additional research was completed at the University of California, Riverside, Historic Map Library and the County Recorder's Office. Historic aerial photographs were viewed on-line (NETR). McKenna also reviewed various histories of the City of Loma Linda and Colton and the results of the analysis are discussed herein.

Research confirmed the project area was not previously surveyed for cultural resources but a minimum of three studies were completed adjacent to the Project Site and another 35 projects have been completed within one mile of the Project Site

A total of 33 cultural resources have been reported within one-mile of the Project Site, including the historic Montecito Memorial Park. The majority of these resources were recorded to the northeast of the Project Site and within the core area of Loma Linda (Anderson Street and Prospect Avenue). Most have been incorporated into the larger holdings of Loma Linda University.

A review of historic maps illustrates the presence of the Montecito Memorial Park and the improvements due north of the current property area, but also illustrate the Project Site as being vacant. Historic aerial photographs illustrate in 1938, Barton Road ends prior to reaching the Memorial Park and the current project area is vacant. In 1959, the project area is still vacant, by scarred by dirt roads and developments are identified north and east of the current project area. The Montecito Memorial Park is evident but involves a relatively small area in comparison to the extent of area use illustrated in 1968. Over the course of the past 50 (+) years, the Memorial Park has neared capacity.

During the survey, areas of direct and indirect impacts were visually inspected for native soils and any evidence of cultural resources. The survey of the Project Site involved intensive coverage of the areas of direct impact and a reconnaissance survey of the areas of indirect impact or where the terrain exhibited slopes greater than 40 degrees. As a result, no evidence of prehistoric Native American cultural resources was identified. No isolated artifacts, no features (e.g. ground rock surfaces, hearths, etc.), or any evidence of potential prehistoric burial locations.

To ensure potential impacts to resources is reduced to a less than significant level, the following mitigation measure shall be implemented:

CR-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards

shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

CR-2: If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

- c) **Less than Significant with Mitigation Incorporated.** Construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measure is required as a condition of project approval to reduce these impacts to a level below significant: The required mitigation measure is:

CR-3: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and the code requirements shall be enforced for the duration of the project.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environment impact 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?	()	()	(✓)	()

- a) **Less than Significant Impact.**

Building Energy Conservation Standards

The California Energy Conservation and Development Commission (California Energy Commission) adopted Title 24, Part 6, of the California Code of Regulations; energy Conservation Standards for new residential and nonresidential buildings in June 1977 and standards are updated every three years. Title 24 ensures building designs

conserve energy. The requirements allow for the opportunities to incorporate updates of new energy efficiency technologies and methods into new developments. In June 2015, the California Energy Commission (CEC) updated the 2016 Building Energy Efficiency Standards. Under the 2016 Standards, residential buildings are approximately 28 percent more energy efficient than the previous 2013 Energy Efficiency Standards. The 2016 Standards improved upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. The CEC updated the 2019 Building Energy Efficiency Standards in May 2018. The 2019 Title 24 standards state that residential buildings are anticipated to be approximately 7 percent more energy efficient. When the required rooftop solar is factored in for low-rise residential construction, residential buildings that meet the 2019 Title 24 standards would use approximately 53 percent less energy than residential units built to meet the 2016 standards.

Senate Bill 350

Senate Bill (SB) 350 (de Leon) was signed into law in October 2015. SB 350 establishes new clean energy, clean air and greenhouse gas reduction goals for 2030. SB 350 also establishes tiered increases to the Renewable Portfolio Standard: 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030.

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law September 2018 and increased the required Renewable Portfolio Standards. SB 100 requires the total kilowatt-hours of energy sold by electricity retailers to their end-use customers must consist of at least 50 percent renewable resources by 2026, 60 percent renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Electricity:

Southern California Edison (SCE) provides electricity to the Project Site. Currently, the Project Site is vacant, however implementation of the Proposed Project would expand the existing Montecito Memorial Park which currently obtains service from SCE. According to the California Energy Commission: Electricity Consumption by Planning Area, all SCE commercial categorized uses (“Commercial Other”) consumed 5,179.71 GWh in the year 2019.⁴ The CalEEMod model projected that the park expansion would consume 0.189 GWh annually. The increase in electricity demand from the Proposed Project would therefore represent a 0.0037 percent of the overall SCE commercial use consumption.

This increased demand is expected to be sufficiently served by the existing SCE electrical facilities. Total electricity demand in SCE’s service area is estimated to increase by approximately 12,000 GWh— between the years 2015 and 2026. The

⁴ <https://ecdms.energy.ca.gov/gasbyplan.aspx>. Accessed 5/11/2021.

increase in electricity demand from the Proposed Project would represent an insignificant percentage of the overall demand in SCE's service area.

The structures associated with the memorial park expansion would be designed to comply with the California 2019 Building Energy Efficiency Standards. The City of Loma Linda would review and verify that the Proposed Project designs would be in compliance with the most current version of the Building and Energy Efficiency Standards. The Proposed Project would also be required adhere to CALGreen, which establishes planning and design standards for sustainable developments, and energy efficiency. These sustainable features would be incorporated into the Proposed Project in which shall include high energy efficiency insulation, wall assemblies and windows to maximize insulation of cool or warm temperature; cool roof concrete roof tiles; and radiant barrier roof sheathing; and energy efficiency heating and cooling systems. The development of the Proposed Project is not anticipated to affect with achievement of the 60 percent Renewable Portfolio Standard established in in the current SB 100. SCE and other electricity retailer's SB 100 goals include that end-user electricity use such as residential and commercial developments use would decrease from current emission estimates. The Proposed Project would not result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Natural Gas:

The Proposed Project and surrounding area are serviced by Southern California Gas Company (SoCalGas). According to the California Energy Commission: Gas Consumption by Planning Area, SoCalGas, commercial categorized uses ("Commercial Other") use consumed 88,553,511 Therms in the year 2019 within the SoCalGas region.⁵ The CalEEMod model projected that the park expansion would consume 6052.89 Therms annually. The increase natural gas demand from the Proposed Project would represent a 0.0068 percent of the SoCalGas commercial use consumption. Therefore, the natural gas demand from the Proposed Project would represent an insignificant percentage of the overall demand in SoCalGas service area. Title 24 is a collection of energy standards that address the energy efficiency of new (and altered) homes; the 2022 Building Energy Efficiency Standards will improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The Proposed Project would be built in accordance with the 2022 energy standards of Title 24; therefore, no significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation are anticipated and no mitigation measures are recommended. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

During operations of the Proposed Project, the use of fuel would be generated by visitors, trips by maintenance staff and employee vehicle trips. The Proposed Project is the expansion of the existing Montecito Memorial Park occurring approximately one mile south of the I-10 freeway and approximately 1.25 miles west of the 15 freeway, reducing the need to drive long distances to the existing freeway system. The Proposed Project is essentially an in-fill project. Additionally, the Proposed Project is not expected to result in a substantial demand for energy that would require expanded supplies or the

⁵ <https://ecdms.energy.ca.gov/gasbyplan.aspx>. Accessed 5/5/2021

construction of other infrastructure or expansion of existing facilities. The fuel use related with vehicle trips produced by the Proposed Project would not be considered inefficient, wasteful, or unnecessary. The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are less than significant, and no mitigation is recommended.

- b) **Less than Significant Impact.** Project design and operation would comply with the County of San Bernardino Greenhouse Gas Emissions Reduction Plan, and the State Building Energy Efficiency Standards related to appliance efficiency regulations, and green building standards as shown in the response above. Project development would not cause inefficient, wasteful and unnecessary energy consumption, and no adverse impact would occur.

The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32; therefore, the Project is consistent with AB 32, which aims to decrease emissions statewide to 1990 levels by 2020 as discussed in Sections III and VIII of this Initial Study. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to 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?	()	()	(✓)	()

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	()	()	()	(✓)
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	()	()	()	(✓)
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	()	(✓)	()	()

Impact Discussion:

a)

- i, ii) **Less than Significant Impact.** Four faults are located within the City limits. They include the San Jacinto Fault, the Loma Linda Fault, the Banning Fault, and the Reche Canyon Fault. The San Jacinto Fault zone crosses the southwest portion of the City and has been the most historically active fault zone in Southern California. As shown on Figure 10.1 of the City’s General Plan, the southern portion of the Project Site is within the San Jacinto Alquist-Priolo Fault Zone, and the actual fault goes through the southeastern corner of the Project Site.⁶

The Alquist-Priolo Earthquake Fault Zoning Act’s main purpose is to prevent the construction of structures developed for human occupancy on the surface trace of active faults. A “structure for human occupancy” is any structure used or intended for supporting or sheltering any use or occupancy, which is expected to have a human occupancy rate of more than 2,000 person-hours per year. The Proposed Project includes traditional burial lawns with related head stones, cremains garden, mausoleums, shade shelters, landscaping improvements and internal roadways. The proposed mausoleum is not expected to experience more than 2,000 person-hours per year. Therefore, the Proposed Project would not risk the loss, injury, or death involving the 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, or from strong seismic ground shaking. Furthermore, the structures associated with the Proposed Project would be designed to comply with standards set forth by the California Building Code (CBC) and Loma Linda Municipal Code. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

- iii) **No Impact.** As shown on Figure 10.1 of the City’s General Plan, the Project Site is not within an area identified as having the potential of liquefaction to occur. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

⁶ City of Loma Linda General Plan. Figure 10.1/Page 10-4.

- iv) **Less than Significant Impact.** The southern portion of the City (commonly known as the South Hills) has steep natural slopes, which are susceptible to instability in certain areas. The type of instability anticipated in this area includes deep-seated landslides, surficial soil slips, wet debris flows, and surficial creep.

The Project Site is identified as having landslide susceptibility, as shown on Figure 5.6-3 Liquefaction and Landslides Susceptibility of the County of San Bernardino's Countywide Plan.⁷ The Proposed Project is expected to comply with the City's policies for new development that is within an environmental hazard area as well as the CBC. Furthermore, the Proposed Project does not propose structures designed for human occupancy and would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no significant impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** During the development of the Proposed Project, project-related dust may be generated due to the operation of machinery on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one acre of soil; therefore, the Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs in an approved SWPPP would ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. The SWPPP shall be prepared by a licensed engineer and approved by the City's Public Works Department prior to the issuance of grading permits. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- c) **Less than Significant Impact.** As previously stated, the Proposed Project occurs in an area determined to have landslide susceptibility and severe ground-shaking from being located within an Alquist-Priolo Fault Zone. However, because the Proposed Project does not include structures designed for human occupancy or include critical facilities (i.e. schools, hospitals, fire and police stations, etc.), impacts from landslides, lateral spreading, subsidence, liquefaction or collapse are considered to be less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** Expansive soils are composed of fine-grained silts and clays which are subject to swelling and contracting. The amount of swelling and contracting is subject to the amount of fine-grained clay materials present in the soils and the amount of moisture either introduced or extracted from the soils. The Project Site consists of two soils as determined by the United States Department of Agriculture (USDA), Natural Resources

⁷ San Bernardino Countywide Plan. Figure 5.6-3/Page 5.6-17.

Conservation Service Web Soil Survey;⁸ San Emigdio sandy loam (SaD) and San Timoteo loam (SgF2). SaD soil is considered well-draining and has no clay materials while SgF2 soil is considered well-draining and is underlain by bedrock. Bedrock is not expansive in nature. Therefore, the potential for expansion of soils on-site is considered to be very low. No impacts are identified or are anticipated, and no mitigation measures are required.

- e) **No Impact.** The Proposed Project would not require the use of septic tanks or alternative wastewater disposal. City of Colton sewer collection lines currently provide service for the existing memorial park and buildings on the expansion area would be connected with on-site laterals to the same system. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- f) **Less Than Significant with Mitigation Implemented.** A paleontological overview was prepared by the Natural History Museum of Los Angeles County for the project area and is included in the Phase I Cultural Resources Investigation completed by McKenna et al. Paleontological resources are recognized as nonrenewable resources significant to our culture, and are afforded protection by Federal, State, and local environmental guidelines. Geologic formations are ranked by their potential to contain significant, nonrenewable palaeontologic resources (SNPR). The Loma Linda Planning Area is in the southern San Bernardino Basin, a structural basin that filled with sediments as a result of activity on the San Andreas and San Jacinto Fault systems. Sedimentary deposition has been taking place in this basin since late Miocene time.

Although the Project Site does not visibly contain a unique paleontological resource or site or unique geologic feature, grading could expose resources that may exist below the surface. Therefore, possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are:

GEO-1: Excavations into any areas of exposed Miocene (and earlier) deposits of the San Timoteo Formation and buried deposits dominating the northern portion of the project area will be monitored by a qualified paleontologist consistent with the policies and protocols of the San Bernardino County Museum. The Paleontologist shall determine the extent and duration of monitoring required and provide a report to the City.

⁸ <https://websoilsurvey.nrcs.us-da.gov/app/WebSoilSurvey.aspx>. Accessed 11/23/20.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	()	()	(✓)	()
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	()	()	(✓)	()

Impact Discussion:

- a) **Less than Significant Impact.** Emissions were estimated using the CalEEMod version 2016.3.2. Construction is anticipated to begin in 2022 and be completed in early 2023. Other parameters used to estimate construction emissions, such as the worker and vendor trips and trip lengths, utilized the CalEEMod defaults. The operational mobile source emissions were calculated using the Trip Generation and Vehicle Miles Travelled Screening Analysis prepared by Ganddini Group, in April 2021. The Trip Generation and Vehicle Miles Travelled Screening Analysis determined that the Proposed Project would generate approximately 145 total daily trips.

Many gases make up the group of pollutants which contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO₂), Methane (CH₄), and Nitrous oxide (N₂O). SCAQMD provides guidance methods and/or Emission Factors that are used for evaluating a project's emissions in relation to the thresholds. A threshold of 3,000 MTCO₂e per year has been adopted by SCAQMD for non-industrial type projects. The Proposed Project greenhouse gas emissions modeled for various phases of construction and for operations are shown in Tables 6 and 7 respectively below.

**Table 6
Greenhouse Gas Construction Emissions
(Metric Tons per Year)**

Source/Phase	CO ₂	CH ₄	N ₂ O
Site Preparation	33.4	0.0	0.0
Grading	122.7	0.0	0.0
Building Construction	225.9	0.1	0.0
Paving	15.0	0.0	0.0
Architectural Coating	4.5	0.0	0.0
Total MTCO₂e	398.6		
SCAQMD Threshold	3,000		
Significant	No		

Source: CalEEMod.2016.3.2 Annual Emissions.

**Table 7
Greenhouse Gas Operational Emissions
(Metric Tons per Year)**

Source/Phase	CO₂	CH₄	N₂O
Area	402.9	0.0	0.0
Energy	92.6	0.0	0.0
Mobile	286.5	0.0	0.0
Waste	4.7	0.3	0.0
Water	19.2	0.1	0.0
Total MTCO₂e	806.3		
SCAQMD Threshold	3,000		
Significant	No		

Source: CalEEMod.2016.3.2 Annual Emissions.

As shown in Table 6 and Table 7, the Proposed Project's emissions would not exceed the SCAQMD's 3,000 MTCO₂e threshold of significance. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b) **Less than Significant Impact.** The applicable plan for the reduction of emissions of greenhouse gases is the San Bernardino County Transportation Authority (SBCTA) formerly San Bernardino Associated Governments (SANBAG) San Bernardino County Regional GHG Reduction Plan. The City of Loma Linda is addressed in the Loma Linda Chapter of the San Bernardino County Regional GHG Reduction Plan, released March 5, 2014. The Plan has been prepared to assist the City in conforming to the GHG emissions reductions as mandated under AB 32. The SCAQMD's Tier 3 thresholds used Executive Order S-3-05 goal as the basis for deriving the screening level. The California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels.
- 2020: Reduce greenhouse gas emissions to 1990 levels.
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

In 2006, the California State Legislature adopted AB 32 the California Global Warming Solutions Act of 2006. AB 32 requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through and enforceable statewide emission cap, which was phased in starting in 2012. Therefore, as the Project's emissions meet the threshold for compliance with Executive Order S-3-05, the Project's emissions would also comply with the goals of AB 32. Additionally, as the Project meets the current interim emissions targets/thresholds established by SCAQMD, the Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 mandated by EO-B-30-15 and SB 32. Furthermore, all the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Project would be required to comply with these regulations as they come into effect.

At a level of 806.3 MTCO₂e per year, as demonstrated in Table 7, the Proposed Project's emissions fall below the SCAQMD and San Bernardino County GHG Reduction Plan screening threshold of 3,000 MTCO₂e for all land use types and is in compliance with the reduction goals of the San Bernardino County GHG Reduction Plan, AB 32, and SB 32. The Proposed Project will comply with applicable Green Building Standards and the City of Loma Linda's policies regarding sustainability (as dictated by the City's General Plan). No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND WASTE MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	()	()	(✓)	()
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	()	()	(✓)	()
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	()	()	()	(✓)
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	()	()	()	(✓)
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	()	()	()	(✓)
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	()	()	()	(✓)
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	()	()	(✓)	()

Impact Discussion:

a, b) **Less than Significant Impact.** Operation of the Proposed Project would not pose a significant hazard to the public or environment through the routine transport, use or

disposal of hazardous materials or through reasonably foreseeable upset and accident conditions. However, construction of the Proposed Project has the potential to create a temporary hazard to the public or environment through the transportation, use and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials. These materials are typical of materials delivered to construction sites.

The future use of the site as a memorial park, could include the storage and use of hazardous materials such as fuels, oils, solvents, pesticides, electronic waste, and other materials used for maintenance. These regulated materials would be stored on-site in small quantities, and would not pose a significant threat to the public. Oversight by the appropriate Federal, State, and local agencies, and the Project's compliance with applicable regulations related to the handling, storage and disposal of hazardous materials will ensure impacts are reduced to a less than significant level. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The nearest school to the Project Site is Cooley Ranch Elementary School, located approximately 0.64 miles northwest of the Project Site at 1000 South Cooley Drive East. No impacts are identified or anticipated and no mitigation measures are required.
- d) **No Impact.** The Project Site is not on a list of hazardous materials sites per the EnviroStor interactive database map.⁹ No significant hazard to the public or the environment is anticipated. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
- e) **No Impact.** There are no airports in the City of Loma Linda and the nearest airport is the San Bernardino International Airport, located approximately 4 miles northeast of the Project Site. No impacts are identified or anticipated and no mitigation measures are required.
- f) **No Impact.** The Project Site does not contain any emergency facilities, nor do streets adjacent to the site serve as emergency evacuation routes.¹⁰ During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. The Proposed Project would not interfere with an adopted emergency response or evacuation plan; therefore, no impacts are identified or are anticipated and no mitigation measures are required.
- g) **Less than Significant Impact.** The Project Site occurs within a Hazardous Fire Area, as shown on Figure 10.3 of the City of Loma Linda General Plan.¹¹ To minimize the threat to persons, property, and the environment resulting from wildfires, the Proposed Project shall implement Policies' (a) through (e) of the City's General Plan Guiding Policy, stated in Section 10.4.2. The Proposed Project would comply with California Building Code and California Fire Code and would be subject to be reviewed by the City of Loma Linda Fire and Building and Safety departments. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

⁹ <https://www.envirostor.dtsc.ca.gov/public/map/?assembly=42> Accessed November 16, 2020.

¹⁰ <http://readydl.com/landing/eoc06071/index.html>. Accessed 5/12/21.

¹¹ City of Loma Linda General Plan. Figure 10.3/Page 10-11.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:	()	()	(✓)	()
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or 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:	()	()	(✓)	()
(i) result in substantial erosion or siltation on- or off-site;	()	()	(✓)	()
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	()	()	(✓)	()
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	()	()	(✓)	()
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	()	()	(✓)	()
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	()	()	(✓)	()

Impact Discussion:

a, e) **Less than Significant Impact.** Preparation and grading of the Project Site would disturb an area greater than one-acre and therefore is subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. Construction activities covered under the State of California’s General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and

implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP) prior to the issuance of building permits as a condition of approval by the Lead Agency. Mandatory compliance with the Proposed Project's WQMP, in addition to compliance with NPDES Permit requirements, would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. The contractor-prepared SWPPP shall be prepared by a licensed engineer and approved by the City's Public Works Department prior to the issuance of grading permits. The WQMP shall be submitted with the grading packet to the City's Public Works Department for review and approval. Therefore, implementation of the Proposed Project would not violate any water quality standards or waste discharge requirements. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

b, c, i-iii) **Less than Significant Impact.** The Proposed Project is not anticipated to substantially impact groundwater supplies or to substantially interfere with groundwater recharge. The Proposed Project does not include groundwater wells that would impact the production rate of any nearby pre-existing wells. A Proposed Drainage Map, dated November 2020, was prepared by Hunsaker & Associates, Inc. (see Figure 4-Site Drainage Map) and depicts the Project Site stormwater flow. Additionally, a Drainage Memo for the Project Site, dated March 26, 2021, was completed by Hunsaker & Associates, Inc. In the existing condition, the modeled 100 year storm event generated a peak storm runoff of 74.8 cubic-feet per second (cfs) at the site's natural outlet onto Oakwood Lane. The Proposed Project is anticipated to reduce the modeled 100 year storm event flow by approximately 12 percent, down to a peak flow rate of 65.7 cfs. This reduction in peak flow rate can be attributed to the minor amount of proposed grading as well as the installation of landscaping. Landscaping will greatly increase the site's ability to capture, retain and infiltrate storm water, reducing storm water run-off.

As stated in the Drainage Memo, water quality objectives would be addressed by implementing several Best Management Practices (BMP's) and Low Impact Design principles (LID). The Project Site is designed to closely mimic the natural drainage pattern of the existing hillside and will preserve over 53.5 percent of the site in its natural undisturbed state. The natural infiltration capacity will also be enhanced by adding landscaping. The additional landscape will slow down run-off and allow storm water additional time to infiltrate. Finally, the Project Site will disperse flows from any and all proposed impervious areas into the adjacent landscaping, which is classified as "areas draining to self-retaining areas". The proposed access roads are intentionally designed without curbs or gutters, thus preventing flows from concentrating. The design of the access roads is intended to allow all run-off to sheet flow across the roadway and into the adjacent landscaping where it will be allowed to infiltrate. The Proposed Project's water quality objectives are being achieved through a combination of site design, impervious area dispersion, and increased infiltration capacity.

The Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a

SWPPP. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would ensure that the Proposed Project does not result in substantial erosion or siltation on- or off-site.

Review of FEMA Map Number 06071C8692H, dated August 8, 2008, shows that the Project Site occurs in FEMA Flood Zone X which is an area of minimal flood hazard.¹² The Proposed Project would include more paved areas and building coverage than what is currently on-site; however, the Project would not alter the course of any stream or river. The existing drainage pattern, storm volume and flow rates would be preserved. The Project design includes landscaping of all non-hardscape areas to prevent erosion. The Building Official and City Engineer must approve a grading and drainage plan prior to the issuance of grading permits. Review and approval of the drainage plan would ensure the Project would not result in substantial erosion, siltation, or flooding on- or off-site. Therefore, no significant impacts are identified or anticipated and no mitigation measures are required.

- d) **Less than Significant Impact.** The Project Site occurs within an area identified as Zone X which is an area of minimal flood hazard and does not occur within an identified tsunami or seiche zone due to its inland location; therefore, the risk of release of pollutants from the Project Site in these events is not anticipated. With the existing drainage pattern and storm volume and flow rates being preserved, potential hazards would be considered a less than significant impact. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	()	()	(✓)	()
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	()	()	(✓)	()

Impact Discussion:

- a, b) **Less than Significant Impact.** The Proposed Project is the expansion of the existing Montecito Memorial Park and is therefore consistent with an adjacent land use. The Proposed Project does not necessitate construction of any new public roadways, flood control channels, or other structures that would physically divide an established community. Upon approval of a General Plan Amendment and Zone Change, the Project Site would be designated and zoned as Open Space by the City’s General Plan. Cemeteries are permitted in the Open Space designation. The Proposed Project complies with the City’s Open Space goals for the Project Site, as shown on Figure 9.1 of the City’s General Plan,¹³ which shows majority of the Project Site as “Targeted Open

¹² <https://msc.fema.gov/portal/search?AddressQuery=grand%20terrace%-2C%20ca#searchresultsanchor>. Accessed 1/29/2021.

¹³ City of Loma Linda General Plan. Figure 9.1/Page 9-3.

Space” and does not conflict with any other policies or regulations. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	()	()	()	(✓)
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	()	()	()	(✓)

Impact Discussion:

a, b) **No Impact.** The Project Site is within the Aggregate Resources Mineral Resource Zone (MRZ) 3, as shown on the San Bernardino Countywide Plan, Figure 5.11-1-Mineral Resource Zones 2 & 3 in the Southwest Quadrant of County.¹⁴ Aggregate MRZ 3 is defined as having moderate potential or possible location of aggregate resources, however, the significance of the deposit is undetermined. Nearly the entire Valley Region of San Bernardino County is designated either MRZ-2 or MRZ-3. The 51-acre Project Site could not feasibly be permitted as a viable aggregate mine site and construction of the few structures proposed would not be a substantial demand of aggregate resources. Implementation of the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	()	()	(✓)	()
b) Generation of excessive groundborne vibration or groundborne noise levels?	()	()	(✓)	()

¹⁴ San Bernardino Countywide Plan. Figure 5.11-1/Page 5.11-5.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	()	()	()	(✓)

Impact Discussion:

- a) **Less than Significant Impact.** Development of the Project would require site preparation (i.e., grading and excavation), and construction. These activities require the use of heavy equipment such as graders, backhoes, and cranes. This equipment would generate noise that would be heard both on and off the Project Site.

Noise can be measured in the form of a decibel (dB), which is a unit for describing the amplitude of sound. The predominant rating scales for noise in the State of California are the Equivalent-Continuous Sound Level (L_{eq}), and the Community Noise Equivalent Level (CNEL), which are both based on the A-weighted decibel (dBA). L_{eq} is defined as the total sound energy of time-varying noise over a sample period. CNEL is defined as the time-varying noise over a 24-hour period, with a weighting factor of 5 dBA applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA applied to events occurring between 10:00 p.m. and 7:00 a.m. defined as sleeping hours). The State of California’s Office of Noise Control has established standards and guidelines for acceptable community noise levels based on the CNEL and L_{dn} rating scales. The purpose of these standards and guidelines is to provide a framework for setting local standards for human exposure to noise. Land use and noise compatibility criteria was developed from various sources, including the California Office of Noise Control, for the City of Loma Linda. These criteria are designed to integrate noise consideration into land use planning to prevent noise/land use conflicts. Low-density residential uses are most sensitive to community noise with noise levels of 60 dBA CNEL/ L_{dn} and below considered “normally acceptable” (65 dBA CNEL/ L_{dn} for multifamily uses). For schools, churches hospitals, and business and commercial areas, noise levels up to 70 dBA CNEL/ L_{dn} are “normally acceptable.” For industrial, manufacturing, and utility uses, noise levels up to 75 dBA CNEL/ L_{dn} may be considered “normally acceptable.”

Adjacent uses to the Project Site include vacant land to the south, residential development to the north and east, and the existing Montecito Memorial Park to the west. Sensitive receivers near the Project Site are the existing residential development to the north and east of the Project Site. The Proposed Project would expand operations for the existing Montecito Memorial Park, which is anticipated to remain below noise levels of 60 dBA CNEL/ L_{dn} . Construction noise is temporary, intermittent and of short duration, and would not present any long-term impacts. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** Construction activities can produce vibration that may be felt by adjacent uses. Although the primary sources of vibration during construction would be from bulldozers and vibratory rollers, other vibratory equipment could be used during installation of pavement. Construction of the Proposed Project would be temporary and would not present any long-term impacts. Operation of the Proposed Project would not generate groundborne vibration. No significant impacts are identified or anticipated and no mitigation measures are required.
- c) **No Impact.** There are no airports in Loma Linda and the nearest airport is the San Bernardino International Airport (SBIA). The airport currently serves small aircraft and cargo flights; it does not offer commercial flights. The City is outside the 60 dBA CNEL airport noise contours of the SBIA. Therefore, aircraft noise is not considered a concern in the City. No impacts are identified or anticipated and no mitigation measures are required.

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

Impact Discussion:

- a, b) **Less than Significant Impact.** The Proposed Project is the expansion of the existing Montecito Memorial Park. Implementation of the Proposed Project is not anticipated to induce substantial unplanned population growth. The Proposed Project requires a General Plan Amendment (GPA No. P20-171), Zone Change (ZC No. P20-170) and Conditional Use Permit (CUP No. P20-157) to change the existing land use designation and zoning from Low Density Residential and Single-Family Residential (R-1), respectively to Open Space.

The “No Net Loss Law” Senate Bill No. 166 (Govt. Code, Section 65863) requires jurisdictions to maintain an inventory of sites to accommodate any unmet portion of the Regional Housing Needs Assessment (RHNA) at all times throughout the planning period. The Housing Element of the City of Loma Linda’s General Plan states that Loma Linda has the same percentage of households earning more than 95 percent of the County median income as that of San Bernardino County as a whole. Additionally, the City has the same percentage of households with a moderate income as the County. The difference in households that are very low and low-income is small, which indicates that the City provides housing for approximately the same percentage of very low and low-income households as do other communities in the County. Thus, Loma Linda is not

an “impacted Community” according to Southern California Association of Governments (SCAG). This means that the City provides its “fair share” housing for lower-income households.¹⁵ Implementation of the GPA and ZC would have no impact to the “No Net Loss Law”.

In addition, Measure V states that “the purpose and intent of this initiative measure is to amend the Loma Linda General Plan by the addition of a new growth management element designed to establish principles of managed growth that will preserve, enhance, and maintain the special quality of life valued by this community, including the protection of hillside areas, preservation of open space, and maintenance of safe, quiet residential areas so that future development within the City will occur in a way that promotes the social and economic well-being of the entire community.” Thus, implementation of the Proposed Project would assist in preserving hillside areas of the City by converting the Project Site from R-1 to Open Space. Therefore, no significant adverse impacts to the loss of residential zoning from the approval of a GPA and ZC from R-1 to Open Space to allow for the development of the Proposed Project are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	()	()	(✓)	()
Police protection?	()	()	(✓)	()
Schools?	()	()	(✓)	()
Parks?	()	()	(✓)	()
Other public facilities?	()	()	()	(✓)

¹⁵ City of Loma Linda General Plan. Page 5-23.

Impact Discussion:

Fire Protection

Less than Significant Impact. The Fire and Rescue Division of the Department of Public Safety provide fire protection for the City of Loma Linda.¹⁶ Fire Station 251, located at 11325 Loma Linda Drive, and Fire Station 252, located at 10520 Ohio Street, services the City of Loma Linda. To ensure adequate fire protection services in an emergency, the City of Loma Linda maintains a joint response/automatic aid agreement with the fire departments in neighboring cities including Colton, Redlands, and San Bernardino. The Department also participates in the California Master Mutual Aid Agreement. Implementation of the Proposed Project would not cause an increase in the population of the City and would not result in the need for additional fire protection. With the collection of development impact fees, impacts related to fire protection is expected to be less than significant and no mitigation measures are required.

Police Protection

Less than Significant Impact. Police protection for the City is provided by and contracted through the San Bernardino Sheriff's Department, located at 655 East Third Street in San Bernardino, at Sheriff's Headquarters, Central Station.¹⁷ The City shares the cost of law enforcement personnel and equipment with the City of Grand Terrace. Implementation of the Proposed Project would not cause an increase in the population of the City and would not result in the need for additional police protection. With the collection of development impact fees, impacts related to police protection are expected to be less than significant and no mitigation measures are required.

Schools

Less than Significant Impact. Public education in the City of Loma Linda is provided by Redlands Unified School District (RUSD) except for the western portion of the City, which is served by Colton Joint Unified School District (CJUSD).¹⁸ In addition to these school districts, one community day school, overseen by San Bernardino County Superintendent of Schools Office, is located in the City of Loma Linda. Loma Linda Academy, a private Seventh-day Adventist school, also provides schooling for kindergarten through high school grades. The nearest school to the Project Site is Cooley Ranch Elementary School, located approximately 0.64 miles northwest of the Project Site at 1000 South Cooley Drive East. The Proposed Project is not anticipated to generate any students and would not generate the need for new facilities. With the collection of development impact fees, impacts to schools would be reduced. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Parks

Less than Significant Impact. Loma Linda currently has existing parkland, and total proposed park land of approximately 40 acres.¹⁹ The Proposed Project would not result in an increase in population. Implementation of policies and goals provided in the City's General Plan, and

¹⁶ City of Loma Linda General Plan. Page 8-2.

¹⁷ City of Loma Linda General Plan. Page 8-4.

¹⁸ City of Loma Linda General Plan. Page 8-6.

¹⁹ City of Loma Linda General Plan. Page 8-12.

collection of developer impact fees would ensure impacts to parks are reduced to a less than significant level. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	()	()	()	(✓)
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	()	()	()	(✓)

Impact Discussion:

a, b) **No Impact.** The Proposed Project consists of the expansion of an existing memorial park and does not include any housing. The Proposed Project does not include recreational facilities, or will increase the use of existing parks, or will require the construction or expansion of existing recreation facilities. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

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

Impact Discussion:

VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

- a) **Less than Significant Impact.** A Trip Generation and Vehicle Miles Travelled Screening Analysis, dated April 13, 2021, was completed by Ganddini Group (available at City offices for review) to assess the potential project Vehicle Miles Travelled (VMT) impact for compliance with California Environmental Quality Act (CEQA) and Senate Bill 743 requirements. The VMT Screening predicted project trip generation based upon rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition, 2017) based on ITE Land Use Code 566 – Cemetery. Through a comprehensive program of transportation and land use planning, the City will ensure that there is sufficient roadway capacity to accommodate traffic generated by planned future development.

According to the VMT, the Proposed Project is forecast to generate fewer than 100 peak hour trips and it is not located within 300 feet of an intersection of two streets designated as Collector or higher. Assuming roadway any roadway improvements shall be constructed to the satisfaction of the City of Loma Linda Public Works Department as a standard condition of approval, there are no apparent safety or operational concerns with implementation of the project. Therefore, further traffic analysis is not required for the Proposed Project.

The City of Loma Linda Measure V requires that long-term traffic Levels of Service should be maintained at Level of Service C (or better), except where the current level is lower than Level of Service C. At locations where the Level of Service is below Level of Service C, the Project shall be required to provide improvements that maintain Levels of Service that are no worse than those existing at the time an application for development is filed. Measure V does not specify criteria for determining the need to prepare a transportation impact analysis for Level of Service evaluations; however, based on the relatively low Project trip generation, as demonstrated by exemption under the County of San Bernardino criteria, the Proposed Project is not anticipated to appreciably contribute Level of Service degradation. Additionally, the Proposed Project would contribute to any applicable City and Regional development impact fees for transportation improvements. Therefore, the Proposed Project is anticipated to have a negligible effect on Levels of Service and would not conflict with Measure V requirements.

Existing bike facilities occur north of the Project Site, along Barton Road. The Project Site does not intersect or connect to any bike facilities within the City. Omnitrans is the primary provider of public transportation within the western portion of San Bernardino County, including the City of Loma Linda. Omnitrans operates five routes that traverse Loma Linda. The Riverside Transit Authority also operates one route that connects Loma Linda to downtown Riverside. There are about 60 bus stops in the City. The City facilitates pedestrian travel through the design of pedestrian-oriented neighborhoods with well-connected streets and sidewalks. The City also provides convenient and safe sidewalk routes to shopping, schools and recreation areas. One such route connects Hulda Crooks Park to Beaumont Avenue thus encouraging pedestrian travel. In addition, the City provides an off-road trail system designed for walking and hiking activities.

The Proposed Project is not anticipated to require additional bike facilities, public transportation, pedestrian facilities, or any additional circulation. The Proposed Project consists of a quasi-public land use and the Proposed Project's VMT characteristics are comparable to those of a public park. Therefore, the Proposed Project can be presumed to result in a less than significant VMT impact. No significant impacts are identified or anticipated and no mitigation measures are required.

- b) **No Impact.** According to the VMT, the Proposed Project's VMT impact has been assessed in accordance with guidance from the County of San Bernardino TIS Guidelines for CEQA. The County of San Bernardino TIS Guidelines identify screening criteria for certain types of projects that typically reduce VMT and may be presumed to result in a less than significant VMT impact.

Since the City of Loma Linda does not have City-specific criteria for the preparation of transportation impact studies, the VMT refers to the County of San Bernardino criteria. The criteria for assessing the need to prepare a transportation impact study is specified in the County of San Bernardino Transportation Impact Study Guidelines (July 2019) ["TIS Guidelines"]. As specified in the County of San Bernardino TIS Guidelines, the requirement to prepare a transportation impact study (with Level of Service analysis) should be based upon one or more of the following criteria:

- If a project generates 100 or more trips without consideration of pass-by trips during any peak hour.
- If a project is located within 300 feet of:
 - The intersection of two streets designated as Collector or higher in the County's General Plan or the Department's Master Plan; or,
 - An impacted intersection as determined by the Traffic Division.
- If this project creates safety or operational concerns.
- The project has the potential to generate VMT that could result in a transportation impact as noted in the significance criteria presented later in this memorandum.
- If a project generates less than 100 trips without consideration of pass-by trips during any peak hour, a study maybe required if there are special concerns.

The Proposed Project is forecast to generate fewer than 100 peak hour trips. The Proposed Project is exempt from preparation of a transportation impact analysis for Level of Service based on the County of San Bernardino criteria as adopted for use by the City of Loma Linda. The Proposed Project is anticipated to have a negligible effect on Levels of Service and would not conflict with Measure V requirements. As such, the Proposed Project shall not conflict or be inconsistent with CEQA Guidelines Section 15064.3 Subdivision (b)(1). Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

- c, d) **Less than Significant Impact.** Final Project site plans would be subject to City review and approval to ensure that the Proposed Project would not create substantial hazards due to a design feature or incompatible use. Primary access to the site would continue to be provided via Waterman Avenue. A new entry is also proposed from Oakwood Drive,

an existing cul-de-sac within the jurisdiction of the City of Colton, that would be extended to allow for a second entry point that would be equipped with a security gate. An emergency fire access only point is also proposed from Sierra Vista Drive located east of Oakwood Drive and within the jurisdiction of the City of Loma Linda. The site plan design is not expected to cause a substantial increase in hazards or provide inadequate emergency access. Plans will be subject to review and approval by the City Fire and Police Departments. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>XVIII. TRIBAL CULTURAL RESOURCES.</p> <p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21704 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:</p>				
<p>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</p>	()	(✓)	()	()
<p>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	()	(✓)	()	()

Impact Discussion:

a,b) **Less than Significant with Mitigation Incorporated.** As discussed in Section V of this document, a Phase I Cultural Resources Investigation, dated December 4, 2020, was prepared by McKenna et al. (McKenna) for the Project Site and is available for review at the City of Loma Linda Community Development Department. The report was prepared to determine impacts to historical resources that may occur on the Project Site, including Native American cultural resources.

McKenna consulted with the Native American Heritage Commission (NAHC) for determining the presence/absence of sacred or religious sites in the vicinity of the project area. A response was received on September 14, 2020, noting “positive” findings

but providing no specific data. McKenna et al., at the request of the City of Loma Linda, acted as the point of contact for SB-18 consultation. Letters were sent to the Native American representatives identified by the NAHC on September 20, 2020. Each entity/individual was informed of the Proposed Project and asked to comment. The individuals and/or representatives of groups from the following Tribes were notified: Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Mission Indians, Cabazon Band of Mission Indians, Cahuilla Band of Indians, Los Coyotes Band of Cahuilla Indians, Ramona Band of Cahuilla, Santa Rosa Band of Cahuilla Indians, Torres-Martinez Desert Cahuilla, San Manuel Band of Mission Indians, Serrano Nation of Mission Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Luiseno Indians, Soboba Band of Mission Indians, Quechan Tribe of the Fort Yuma Res.

Responses were received from five Tribes. Ryan Nordness of the San Manuel Band of Mission Indians responded on September 29, 2020 via email. Nordness referenced the presence of the Native American village (Guachama), zanja, Asistencia, and the presence of burials in the immediate area. The Serrano consider this area to be highly sensitive for the presence of other Native American burials and/or evidence of occupation. They have requested additional consultation. Victoria Martin of the Augustine Band of Cahuilla Indians responded on October 20, 2020 and requested to be notified if any Native American cultural resources are identified over the course of these investigations (or subsequent mitigation monitoring). Lacy Padilla, representing the Agua Caliente Band of Cahuilla Indians, responded via email on October 1, 2020. Ms. Padilla noted the project area is outside the Cahuilla traditional territory and deferred consultation to other tribes in the area. On September 30, 2020, Deneen Pelton, representing the Rincon Band of Luiseno Indians, responded with a letter noting the project area is not within the traditional territory of the Rincon Band. Ms. Pelton recommended contacting a representative of a “closer” tribe. An email response was received from Jill McCormick of the Quechan Indians on September 28, 2020, stating the tribe had no comments regarding this project area and recommended contacting “more local Tribes.” At the time of the report, no response was received from any of the other individuals contacted. McKenna et al. also contacted Anthony Morales, via phone (October 1, 2020), to inquire into any concerns the San Gabriel Band of Mission/Tongva Indians may have with respect to this project. He concurred with the assessment of sensitivity for prehistoric resources and requested he be kept informed of any resources that may be identified within the project area.

According to CEQA Guidelines, the identification of potential “tribal cultural resources” is beyond the scope of the study prepared by McKenna et al. and needs to be addressed through government-to-government consultations between the City of Loma Linda and the pertinent Native American groups pursuant to AB52. As such, tribes’ requests for additional project information, coordination, or consultation with the Lead Agency, and/or Native American monitoring, shall be acknowledged through implementation of appropriate Conditions of Approval, at the City of Loma Linda’s discretion.

The following mitigation measures were provided by San Manuel Band of Mission Indians and shall be made a part of Conditions of Approval for the Project. The mitigation measures are:

TCR-1: The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CR-1, of any pre-contact and/or

historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resource Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

TCR-2: Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and the Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

Based on completion of consultation under AB 52 with interested tribes, additional recommendations may be incorporated into the Project's Conditions of Approval. Implementation of the above mitigation measures and the addition of recommendations from interested tribes as Conditions of Approval, would ensure that potential impacts to tribal cultural resources are reduced to a less than significant level.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?	()	()	(✓)	()

Impact Discussion:

a, c) **Less than Significant impact.** The Project Site is within the City of Colton’s Publicly Owned Treatment Works wastewater treatment plan (POTW) service area. According to the City of Colton’s 2015 Sewer System Management Plan, the City is responsible for the maintenance of approximately 114 miles of sewer line. The POTW has an average daily flow of 5.4 MGD and facility design capacity of 10.4 MGD. The Proposed Project would connect to the existing sewer system line currently serving the existing memorial park. With no permanent residents on-site and minimal administrative facilities, wastewater generation from the park expansion would be minimal.

The existing memorial park’s water supply is from an on-site well owned by Montecito. There is no supplemental water supply that is provided by any public agency. The estimated water use for the expansion area can be accommodated by the well’s current capacity and production rates.

In the existing condition, the modeled 100 year storm event generated a peak storm runoff of 74.8 cubic-feet per second (cfs) at the site’s natural outlet onto Oakwood Lane. The Proposed Project is anticipated to reduce the modeled 100 year storm event flow by approximately 12 percent, down to a peak flow rate of 65.7 cfs.

Implementation of the Proposed Project would not 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 (refer to Section VI of this Initial Study). Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

b) **Less than Significant impact.** The majority of water use at the existing memorial park, as it will be at the expansion Project Site if for irrigation. Water is supplied by a privately-owned well and therefore is not included in the long-range water supply scenarios provided by any agency’s Urban Water Management Plan. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

d, e) **Less than Significant Impact.** Solid waste collection in the City of Loma Linda is primarily disposed of at the San Timoteo Sanitary Landfill which is operated by the County of San Bernardino.²⁰ With continued recycling efforts, there is sufficient capacity at the San Timoteo Sanitary Landfill to accommodate growth for the next 20 years and beyond. (San Timoteo: permitted until January 2039²¹).

²⁰ City of Loma Linda General Plan. Page 8-20.

²¹ <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1906?siteID=2688> (accessed 1-5-21).

Implementation of the Proposed Project would not generate significant additional solid waste than what is already produced at the existing Montecito Memorial Park. The proposed expansion would require five additional employees. No public restrooms are included in the proposed expansion. The solid waste collection system would not be affected by the development of the Project Site as sufficient capacity exists at the facility. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

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

Impact Discussion:

- a) **No Impact.** Primary access to the site would continue to be provided via Waterman Avenue. A new entry is also proposed from Oakwood Drive, an existing cul-de-sac within the jurisdiction of the City of Colton, that would be extended to allow for a second entry point that would be equipped with a security gate. An emergency fire access only point is also proposed from Sierra Vista Drive located east of Oakwood Drive and within the jurisdiction of the City of Loma Linda. Construction and operation of the proposed expansion would not disrupt emergency access within the area as the proposed entry to the site would provide adequate emergency access. Additionally, the California Emergency Services Act requires the City to manage and coordinate the overall emergency and recovery activities within its jurisdictional boundaries. The City's Emergency Operations Plan includes policies and procedures to be administered by the City in the event of a disaster. During disasters, the City of Loma Linda is required to

coordinate operations with the County of San Bernardino.²² Policies within the City's General Plan and updates to the City's Emergency Plan, as required by State law, would ensure the Proposed Project would not interfere with adopted policies and procedures. Therefore, no impacts are identified or anticipated and no mitigation measures are required.

- b, d) **Less than Significant impact.** As shown on Figure 10.3 of the City's General Plan, the Project Site occurs in a very high fire hazard severity zone.²³ In the City, the highest fire risk area occurs in Badlands (locally known as the South Hills). Prolonged droughts coupled with high winds and dry vegetation during summer months creates the highest fire risk in these areas. Loma Linda is subject to Santa Ana winds, which are defined by the National Weather Service as "strong down slope winds that blow through the mountain passes in southern California. These winds, which can easily exceed 40 miles per hour, are warm and dry and can severely exacerbate brush or forest fires, especially under drought conditions." These winds, which typically occur several times per year between September and December, have been known to topple power lines, trees, and streetlights and can also spread uncontrolled wildfire and hinder firefighters from reaching fires.

The Project Site occurs in FEMA Flood Zone X which is an area of minimal flood hazard. The Project Site is vacant and is adjacent to the South Hills. Although the Project Site is located in an area with very high fire hazard and landslide susceptibility, operation of the proposed expansion is not expected to experience more than 2,000 person-hours per year (Further discussed in Section VII of this report). Therefore, the Proposed Project would not risk the loss, injury, or death involving pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, or 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.

All building, access, landscaping, and fire water requirements are expected to meet the 2018 International Wildland Urban Interface Code (IWUIC). Policy 8.1.2.1 (d) of the City of Loma Linda's General Plan requires implementation of fire protection measures, such as a buffer area of fire-resistant plants and non-combustible roofing in areas of high fire hazard as identified on Figure 10.3 of the City's General Plan. Final plans shall be reviewed and approved by the responsible Fire Authority and Department of Building and Safety to ensure a less than significant impact. No significant adverse impacts are identified or anticipated and no mitigation measures are required.

- c) **No Impact.** The area surrounding the Project is currently developed and is currently serviced by existing infrastructure, including roadways (i.e. Oak something Drive) power lines, natural gas lines, water, sewer, and telephone. The Proposed Project does not include the installation or maintenance of infrastructure and therefore the risk of fire from these activities is not anticipated. No impacts are identified or anticipated and no mitigation measures are required.

²² City of Loma Linda General Plan. Page 10-14.

²³ City of Loma Linda General Plan. Figure 10.3/Page 10-11.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	()	()	(✓)	()

Impact Discussion:

a) **Less than Significant Impact.** A Biological Resources Assessment (BRA), dated May 2021, was completed by Jennings Environmental, LLC., to determine significant impacts to the quality of the environment of the Project Site including impacts on habitats and threatened or endangered species. The report concluded that no sensitive habitat, including USFWS designated critical habitat, occurs within or adjacent to the Project Site. Although no Burrowing Owl (BUOW) individuals were observed during the survey, the Project Site and adjacent surrounding area does contain some habitat that would be considered suitable for BUOW. The Project Site and immediate surrounding areas contains habitat suitable for nesting birds and thus, Mitigation Measure BIO-1 as provided in this Initial Study is required to reduce impacts to a less than significant level. Furthermore, a coastal California gnatcatcher (CAGN) permitted biologist conducted protocol level non-breeding season surveys and determined the Project Site as almost entirely located within Unit 10 of the Critical Habitat for the federally listed CAGN. As a condition of approval, Section 10 consultation with the USFWS is required for issuance of an Incidental Take Permit for authorized take of a listed species. This will be a condition of project approval.

A Phase I Cultural Resources Investigation, dated December 4, 2020, was completed by McKenna et al., to determine significant impacts to the major periods of California history and prehistory of the Project Site and surrounding area. The Project Site was concluded to have no historical significance and no archaeological resources or significant geologic

units were encountered or recorded as existing on-site. Implementation of Mitigation Measures CR-1 to CR-3, GEO-1, and TCR-1 to TCR-2 as provided in this Initial Study would ensure impacts to cultural resources including tribal cultural resources are less than significant. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

- b) **Less than Significant Impact.** Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Sections 15130 (a) and (b), states:
- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
 - (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

Impacts associated with the Proposed Project would not be considered individually or cumulatively adverse or considerable. No major development projects were identified within the vicinity of the Proposed Project. Approval of a General Plan Amendment and Zone Change would change the existing land use designation and zoning from Low Density Residential and Single-Family Residential (R-1), respectively to Open Space. Cemeteries are conditionally permitted within the Open Space District and would be consistent with the City of Loma Linda General Plan. Impacts identified in this Initial Study can be reduced to a less than significant impact. Therefore, no significant adverse impacts are identified or are anticipated and no mitigation measures are required.

- c) **Less than Significant Impact.** The incorporation of design measures, City of Loma Linda policies, standards, and guidelines and proposed Mitigation Measures as identified within this Initial Study would ensure that the Proposed Project would have no significant adverse effects on human beings, either directly or indirectly on an individual or cumulative basis. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

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