



City of Rialto
Planning Division
150 S. Palm Avenue
Rialto, CA 92376

Notice of Preparation of a Draft EIR and Scoping Meeting

Date: July 23, 2021
To: Public Agencies and Interested Parties
Subject: Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting
Project Title: Birtcher Logistics Center Rialto

The City of Rialto, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) for the Birtcher Logistics Center Rialto project (hereinafter “Project”). In accordance with Section 15082 of the CEQA Guidelines, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, and other interested parties with information describing the proposed project and its potential environmental effects.

Due to time limits mandated by State law your response must be sent at the earliest possible date but no later than 30 days after the date of this notice.

Notice of Preparation Review Period: July 23, 2021 to August 23, 2021

Scoping Meeting: August 12, 2021 at 6:00pm

Project Location & Setting

The approximately 21-acre Project site is bound by Valley Boulevard on the south and Willow Avenue on the east in the City of Rialto, San Bernardino County, California (see Figure 1, *Vicinity Map*). Under existing conditions, the entire Project site is developed/disturbed and used for the outdoor storage of trailers, construction equipment, and construction materials (see Figure 2, *Aerial Photograph*). The Project site also contains several outbuildings used for storage and offices for the businesses operating on-site.

Project Description

The California Environmental Quality Act (CEQA) defines a project as “the whole of an action” that has the potential to result in a direct or reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378(a)). The proposed Project contains six components, as described below:

General Plan Amendment No. 2020-0001 proposes to amend the City of Rialto Land Use Policy Plan (General Plan Exhibit 2.2) to change the land use designation for the southern portion of the Project site from “General Commercial” to “Business Park.” The northern portion of the Project site already is designated Business Park under existing conditions and does not require amendment.

Specific Plan Amendment No. 2020-0001 proposes to amend the Land Use Plan for the Gateway Specific Plan to change the land use designation for the southern portion of the Project site from “Freeway Commercial” to “Industrial Park.” The northern portion of the Project site already is designated Industrial Park under existing conditions and does not require amendment.

Conditional Development Permit No. 2020-0006 and **Precise Plan of Design No. 2020-0012** provide a development plan, including site layout, architectural design, and landscape plan, for the development and of an approximately 492,410-square-foot warehouse distribution building on the Project site (refer to Figure 3, *Proposed Site Plan*). The Project provides an enclosed truck court on the west side of the proposed warehouse building. The truck court includes 62 dock doors and 104 trailer parking stalls. The Project also provides 287 passenger vehicle parking spaces (distributed along the north and south sides of the building). Vehicular access to the Project site would be provided by two proposed driveways onto Valley Boulevard and one proposed driveway onto Willow Avenue.

Variance No. 2020-0001 is a proposed exception to the 35-foot height limit within the Gateway Specific Plan’s “Industrial Park” zone. When the Gateway Specific Plan was adopted 31 years ago, the technological advances and modern business practices of today’s warehouse distribution industry could not be contemplated and the variance to the height limit is required to ensure the proposed building can provide an interior clear height that meets the needs of modern warehouse distribution users. In addition, the proposed Variance provides an exception to Rialto Municipal Code Section 18.61.250(E) to allow less than a 10-foot-wide landscape strip along segments of the Project site’s northern boundary. The reduction in landscaping along the northern site boundary is necessary to accommodate the City’s request for an additional access lane for inbound trucks so that truck queuing will occur on-site and not spill onto Willow Avenue.

Finally, **Lot Merger No. 2021-0002** proposes to combine the subject property’s four existing parcels – APNs 0254-261-14, 0254-261-17, 0132-201-03, and 0132-181-01 – into a single parcel.

EIR Scope

The City of Rialto has determined that an EIR will be prepared for the Project based on its scale and potential to cause significant environmental effects. Based on the information presented in the Initial Study prepared for the Project, the following topics will be evaluated in detail in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

The EIR will assess the effects of the Project on the environment, identify potentially significant impacts, identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts, and discuss potentially feasible alternatives to the Project that may accomplish basic objectives while lessening or

eliminating any potentially significant project impacts. The EIR will be prepared on behalf of and under the supervision of the City of Rialto by the consulting firm T&B Planning, Inc. located at 3200 El Camino Real, Suite 100, Irvine, CA 92602.

Opportunity for Public Review and Comment

This Notice and the Initial Study prepared for the Project are available for review on the City's website at:

<https://www.yourrialto.com/314/Current-Projects>

The City of Rialto requests your careful review and consideration of this notice, and invites written comments regarding the scope of the information and analysis to be included in the EIR. In accordance with the time limits established by CEQA, your response should be sent at the earliest possible date, but no later than thirty (30) days after publication of this notice. Please submit your comments by 6:00 p.m. on July 23, 2021 to:

Daniel Casey, Senior Planner
City of Rialto
Community Development Department – Planning Division
150 S. Palm Avenue
Rialto, CA 92376
Phone : (909) 820-2535
Email: dcasey@rialtoca.gov

Please include the name, phone number, email, and address of a contact person in your response.

Scoping Meeting

Pursuant to California Public Resources Code Section 21083.9(a)(2) of the CEQA Statute and CEQA Guidelines Section 15082(c), the City of Rialto will hold a public scoping meeting, where agencies, organizations, and members of the public will receive a brief presentation on the Project, the scope of environmental review, and the overall EIR process. While the issues raised in this meeting will be summarized in the required EIR, anyone wishing to make formal comments on the Notice of Preparation must do so in writing.

The meeting will be held on:

Date and Time: August 12, 2021 at 6:00pm

Place: City of Rialto
City Council Chambers
150 S. Palm Avenue
Rialto, CA 92376

Should you require special accommodations at the public scoping meeting, such as for the hearing impaired or an English translator, please contact the City of Rialto no later than Friday, August 6, 2021 (see contact information above).

City of Rialto
Birtcher Logistics Center Rialto

Attachments:

Figure 1 – Vicinity Map

Figure 2 – Aerial Photograph

Figure 3 – Proposed Site Plan

CEQA Initial Study

Birtcher Logistics Center Rialto

City of Rialto, California

Lead Agency

City of Rialto
150 S. Palm Avenue
Rialto, CA 92376

CEQA Consultant

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

Project Applicant

QR Birtcher Willow Ave. Owner LLC
450 Newport Center Drive, Suite 220
Newport Beach, CA 92660

Lead Agency Discretionary Permits

General Plan Amendment No. 2020-0001
Specific Plan Amendment No. 2020-0001
Conditional Development Plan No. 2020-0006
Precise Plan No. 2020-0012
Variance No. 2020-0001
Lot Merger No. 2021-0002

July 2021

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List of Acronyms, Abbreviations, and Units of Measure

<u>Acronym</u>	<u>Definition</u>
§	Section
amsl	Above Mean Sea Level
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMP	Best Management Practice
BP	Business Park
CalFire	California Department of Forestry and Fire Protection
CBSC	California Building Standards Code
CCR	California Code of Regulations
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
dB	Decibel
DIF	Development Impact Fee
DPM	Diesel Particulate Matter
e.g.	exempli gratia meaning "for example"
EIR	Environmental Impact Report
ESFR	Early Suppression, Fast Response
F-C	Freeway Commercial
FAR	Floor Area Ratio
FIRM	Flood Insurance Rate Map
GC	General Commercial
GHG	Greenhouse Gas(es)
I-#	Interstate #
I-P	Industrial Park
i.e.	id est meaning "that is"
MND	Mitigated Negative Declaration
MRZ-#	Mineral Resource Zone #
NAHC	Native American Heritage Commission
ND	Negative Declaration
No.	Number
NPDES	National Pollution Discharge Elimination System
RFD	Rialto Fire Department
RWTP	Rialto Wastewater Treatment Plant
SB-#	Senate Bill #
SBCFD	San Bernardino County Fire Department

List of Acronyms, Abbreviations, and Units of Measure

<u>Acronym</u>	<u>Definition</u>
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
s.f.	Square Foot or Square Feet
SR-#	State Route #
SWPPP	Stormwater Pollution Prevention Plan
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plan

1.0 INTRODUCTION

1.1 Purpose and Scope of this CEQA Initial Study

The California Environmental Quality Act (CEQA) is a State-wide environmental law contained in Public Resources Code Sections (§) 21000-21177. CEQA applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. CEQA requires that public agencies analyze and acknowledge the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts to the environment when avoidance or reduction is feasible. The CEQA compliance process also gives other public agencies and the general public an opportunity to comment on a proposed project's environmental effects.

This Initial Study assesses the potential for implementation of the proposed Birtcher Logistics Center Rialto project (the "Project") to affect the physical environment. This Initial Study addresses the potential environmental effects of the proposed Project, including the reasonably foreseeable effects that could result from all of the discretionary actions and approvals required to implement the Project, as well as subsequent construction and operational activities. As part of the City of Rialto's permitting process, the Project is required to undergo an initial environmental review pursuant to CEQA Guidelines § 15063. This Initial Study serves as the preliminary analysis for the Project and was prepared under the supervision of the City of Rialto Community Development Department, Planning Division, acting in its capacity as the CEQA Lead Agency, to determine the type and scope of the environmental review that will be required for the Project. This Initial Study presents and substantiates the City of Rialto's determination regarding the type of CEQA compliance document that will be prepared for the Project, which could consist of either an environmental impact report (EIR); mitigated negative declaration (MND); negative declaration (ND); addendum to a previously-prepared EIR; or a tiered analysis that relies on the findings and conclusions of a previously-prepared CEQA compliance document. If the Initial Study concludes, based on substantial evidence in the City's records, that the Project has the *potential* to result in a significant effect on the environment that cannot be avoided, reduced, or mitigated to below stated thresholds of significance, the City of Rialto is obligated to prepare an EIR for the Project.

This Initial Study is an informational document that provides the City of Rialto, other public agencies, interested parties, and the public at-large with an objective assessment of the potential environmental impacts that *could* result from implementation of the proposed Project.

1.2 Potential Environmental Effects of the Proposed Project

The analysis presented in this Initial Study indicates that the proposed Project has the potential to result in one or more significant direct, indirect, and/or cumulatively considerable environmental effects under the following environmental subjects:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy

- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance

Based on the analysis provided in the Environmental Checklist portion of this Initial Study, the proposed Project has the potential to result in significant effects on the environment for which feasible mitigation measures may not be available to reduce all of those effects to below thresholds of significance used by the City of Rialto to comply with CEQA. Accordingly, and pursuant to CEQA Guidelines § 15063(b)(1), the City of Rialto will require the preparation of an **Environmental Impact Report (EIR)** for the Project, which will focus on potential impacts to the environmental issue areas listed above.

2.0 PROJECT DESCRIPTION AND SETTING

The Project involves the development of an industrial warehouse building on approximately 21.0 acres of land located in the southeast portion of the City of Rialto, San Bernardino County, California. Discretionary approvals requested from the City of Rialto by the Project Applicant include a General Plan Amendment (No. 2020-0001), a Specific Plan Amendment (No. 2020-0001), a Conditional Development Permit (No. 2020-006), a Precise Plan (No. 2020-0012), a Variance (No. 2020-0001), and a Lot Merger (No. 2021-0002).

2.1 Project Location

The Project site is located in the southeast portion of the City of Rialto, San Bernardino County, California. The City of Rialto is located east of the City of Fontana and the unincorporated community of Bloomington, west of the Cities of San Bernardino and Colton, and northwest of the City of Grand Terrace and unincorporated community of Highgrove, and north of the City of Riverside. As shown on Figure 2-1, *Regional Map*, the Project site is approximately 0.1-mile north of Interstate 10 (I-10) and approximately 4.5 miles west of Interstate 215 (I-215). The Rialto Municipal Airport is located approximately 4.0 miles to the northwest of the Project site.

At the local scale, the Project site is located at the northwest corner of the intersection of Valley Boulevard and Willow Avenue (see Figure 2-2, *Vicinity Map*). The Project site includes Assessor Parcel Numbers (APNs) 0254-261-14, 0254-261-17, 0132-201-03, and 0132-181-01.

2.2 Existing Condition of the Property

As shown on Figure 2-3, *USGS Topographic Map*, the Project site is relatively flat with elevations generally ranging from approximately 1,085 feet above mean sea level (amsl) in the northwestern portion of the site to approximately 1,058 feet amsl in the southeastern portion of the Project site. Currently, the entire Project site is developed/disturbed and used for the outdoor storage of trailers, construction equipment, and construction materials. The Project site also contains several outbuildings used for storage and offices for the businesses operating on-site. Figure 2-4, *Aerial Photograph*, illustrates the existing condition of the Project site.

2.3 Environmental Setting and Surrounding Land Uses

Land uses surrounding the Project site include the following:

North: Vacant, undeveloped land abuts the Project site to the north. A man-made storm drain channel also abuts a portion of the Project site to the north. Farther north is vacant, undeveloped land and property occupied by industrial/warehouse buildings.

South: Immediately to the south of the Project site is Valley Boulevard. On the south side of Valley Boulevard is a vacant industrial building, a building housing several auto repair workshops, and an office building.

West: Properties abutting the Project site on the west are occupied by a variety of uses, including warehouse buildings, truck parking, construction materials fabrication and storage.

East: Immediately east of the Project site is Willow Avenue. East of Willow Avenue is vacant, undeveloped land and an industrial building.

2.4 Description of the Proposed Project

The proposed Project would result in the re-development of the subject property as a warehouse distribution building with approximately 492,410 square feet (s.f.) of building area. The Project would include a cargo loading area (within an enclosed truck court with loading docks on the west side of the proposed building), parking areas, landscaping, signage, and lighting. The discretionary actions under consideration by the City of Rialto to implement the Project are summarized below.

A. General Plan Amendment No. 2020-0001

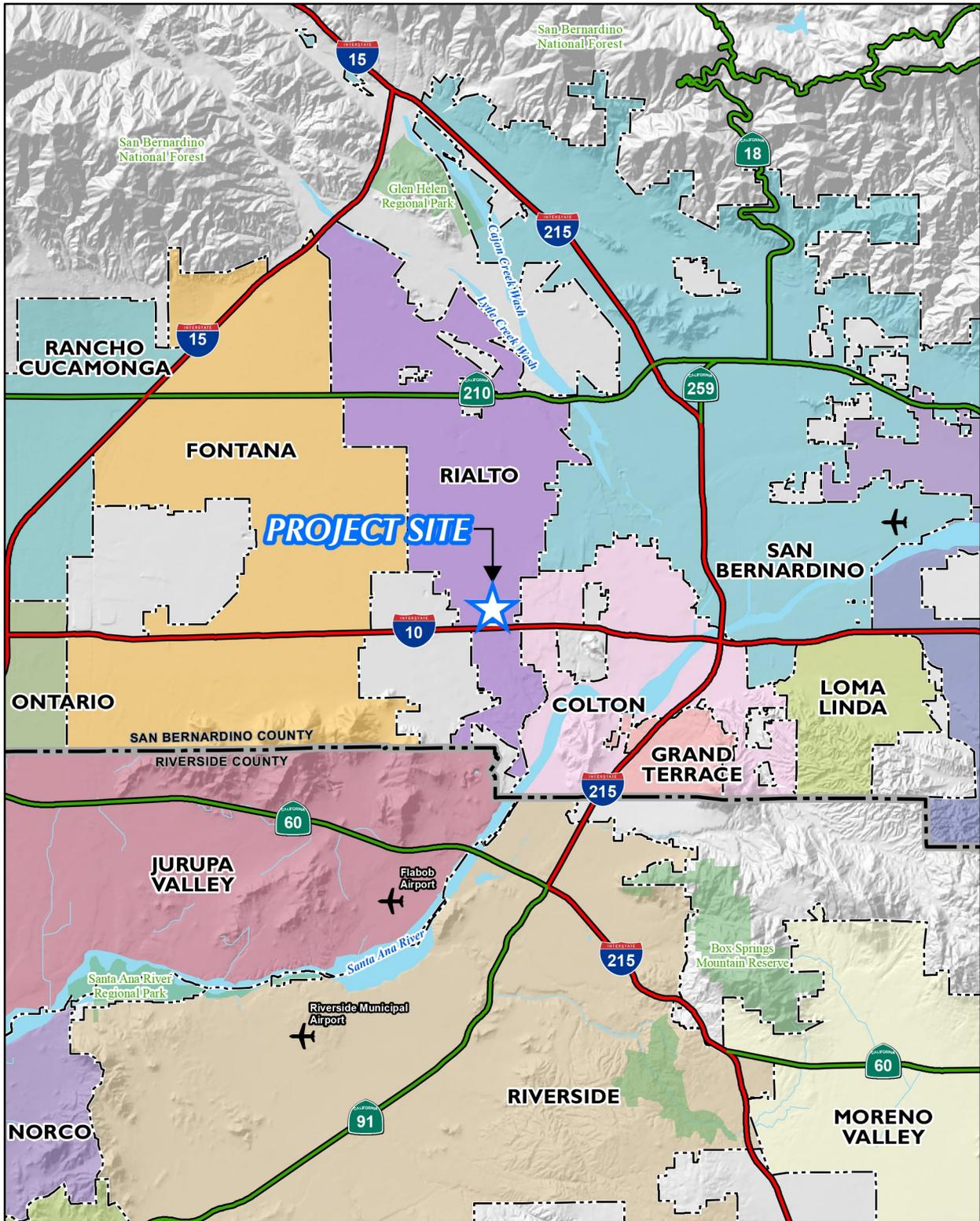
General Plan Amendment No. 2020-0001 proposes to amend the City of Rialto Land Use Policy Plan (General Plan Exhibit 2.2) to change the land use designation for the southern portion of the Project site from “General Commercial” to “Business Park” as shown on Figure 2-5, *Proposed General Plan Amendment*. The northern portion of the Project site is designated Business Park under existing conditions and does not require amendment. The Business Park designation allows light industrial uses developed in a complementary manner and displaying high-quality architecture and site design (Rialto, 2010a, p. 2-9).

B. Specific Plan Amendment No. 2020-0001

As shown on Figure 2-6, Specific Plan Amendment No. 2020-0001 proposes to amend the Land Use Plan for the Gateway Specific Plan to change the land use designation for the southern portion of the Project site from “Freeway Commercial” to “Industrial Park.” The northern portion of the Project site is designated Industrial Park under existing conditions and does not require amendment.

C. Conditional Development Permit No. 2020-0006 and Precise Plan of Design No. 2020-0012

Conditional Development Permit No. 2020-0006 and Precise Plan of Design No. 2020-0012 provide a development plan, including site layout, architectural design, and landscape plan, for the development of an approximately 492,410 s.f. warehouse distribution building on the Project site. The Project provides an enclosed truck court on the west side of the proposed warehouse building. The truck court includes 62 dock doors and 104 trailer parking stalls. The Project also provides 287 passenger vehicle parking spaces (distributed along the north and south sides of the building). Vehicular access to the Project site would be provided by two proposed driveways onto Valley Boulevard and one proposed driveway onto Willow Avenue. The proposed western driveway on Valley Boulevard would serve passenger cars and trucks and would allow for full turning movements into and out of the site. The proposed eastern driveway on Valley Boulevard would serve passenger cars only and would be restricted to right-in/right-out access. The proposed driveway on Willow Avenue would accommodate access for passenger cars and trucks and would allow for full turning movements into and out of the site.

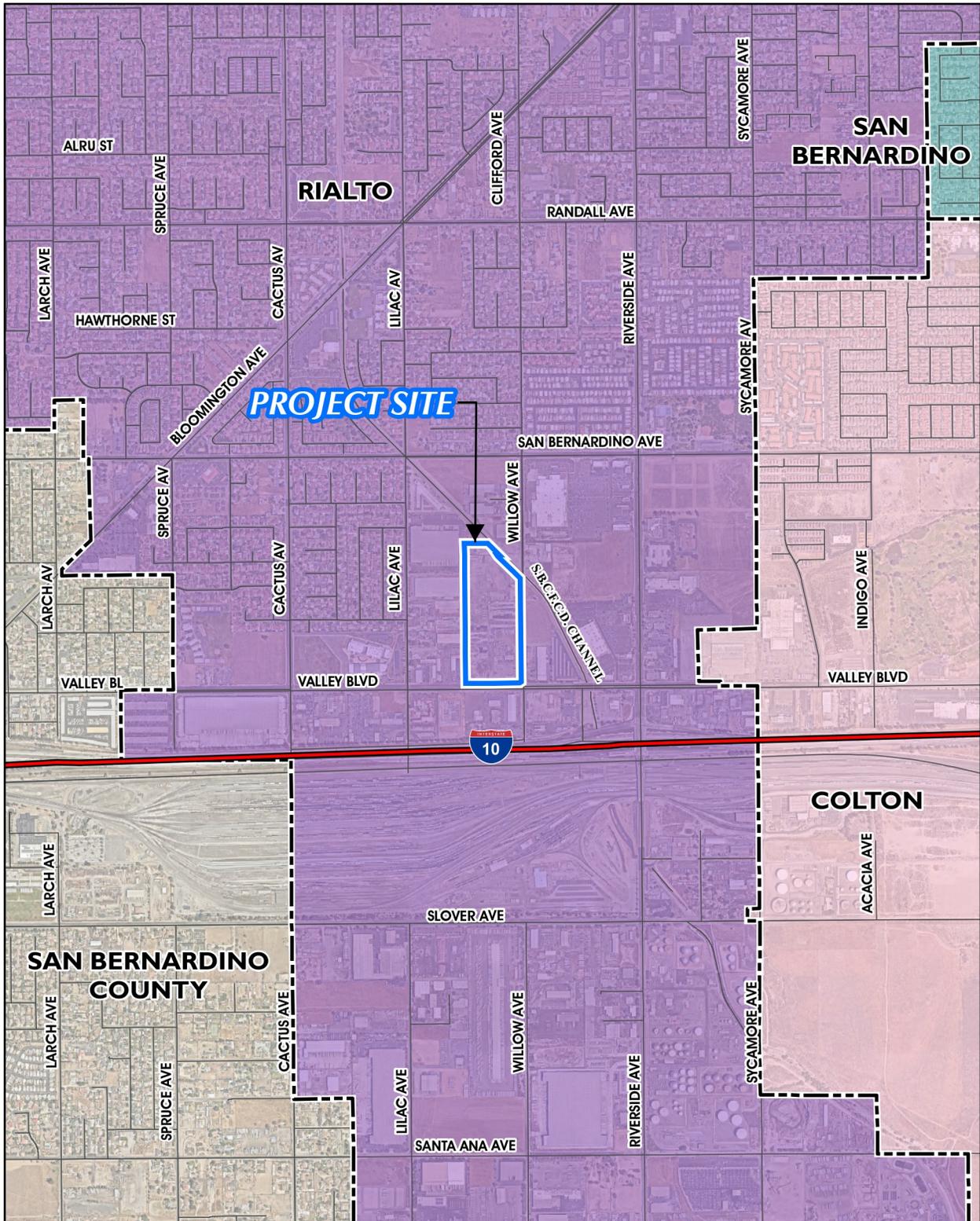


Source(s): ESRI, RCTLMA (2021), SB County (2020), SCAG (2021)

Figure 2-1



Regional Map

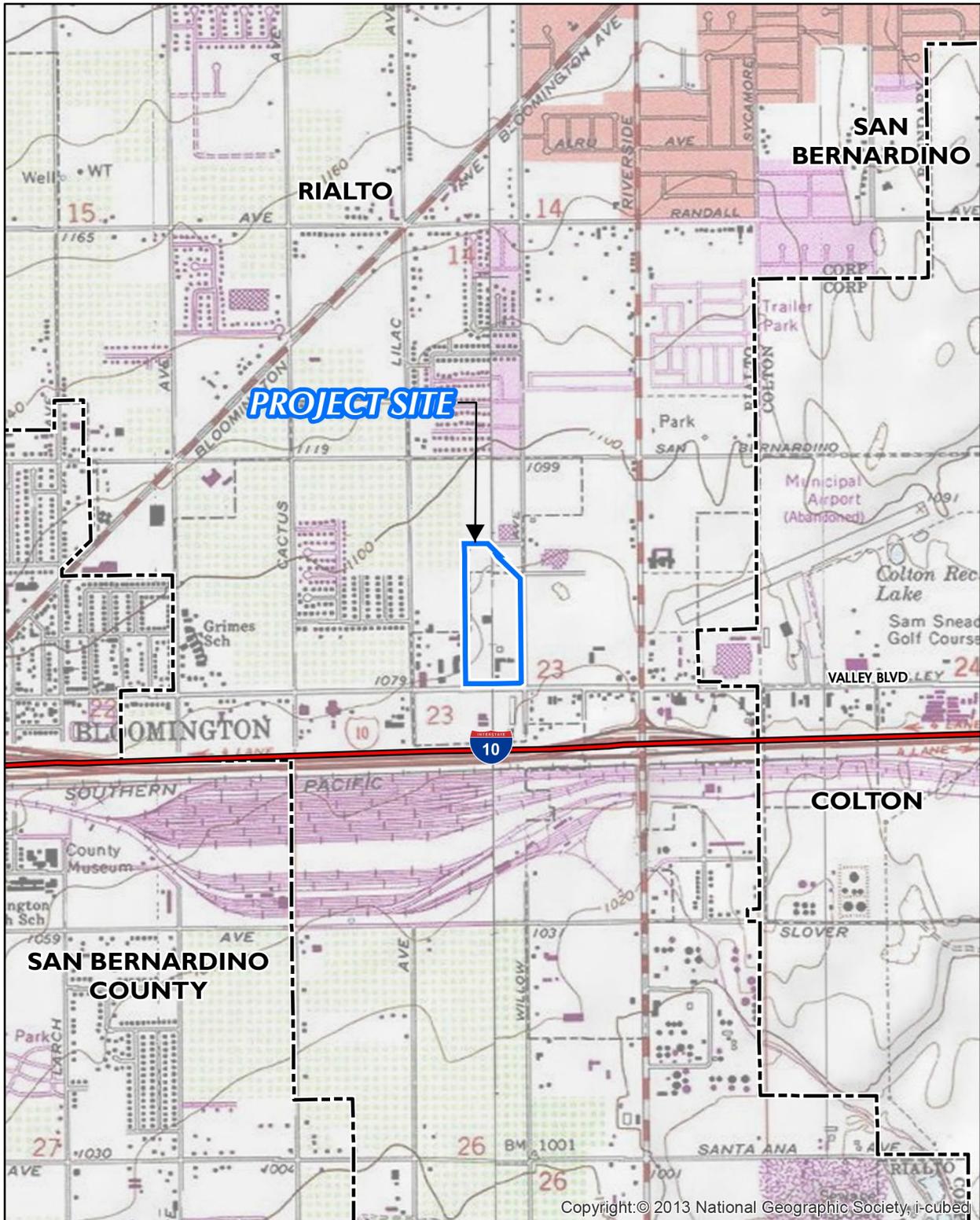


Source(s): ESRI, SB County (2020), SCAG (2021)

Figure 2-2



Vicinity Map



Source(s): ESRI, SCAG (2021)

Figure 2-3



USGS Topographic Map



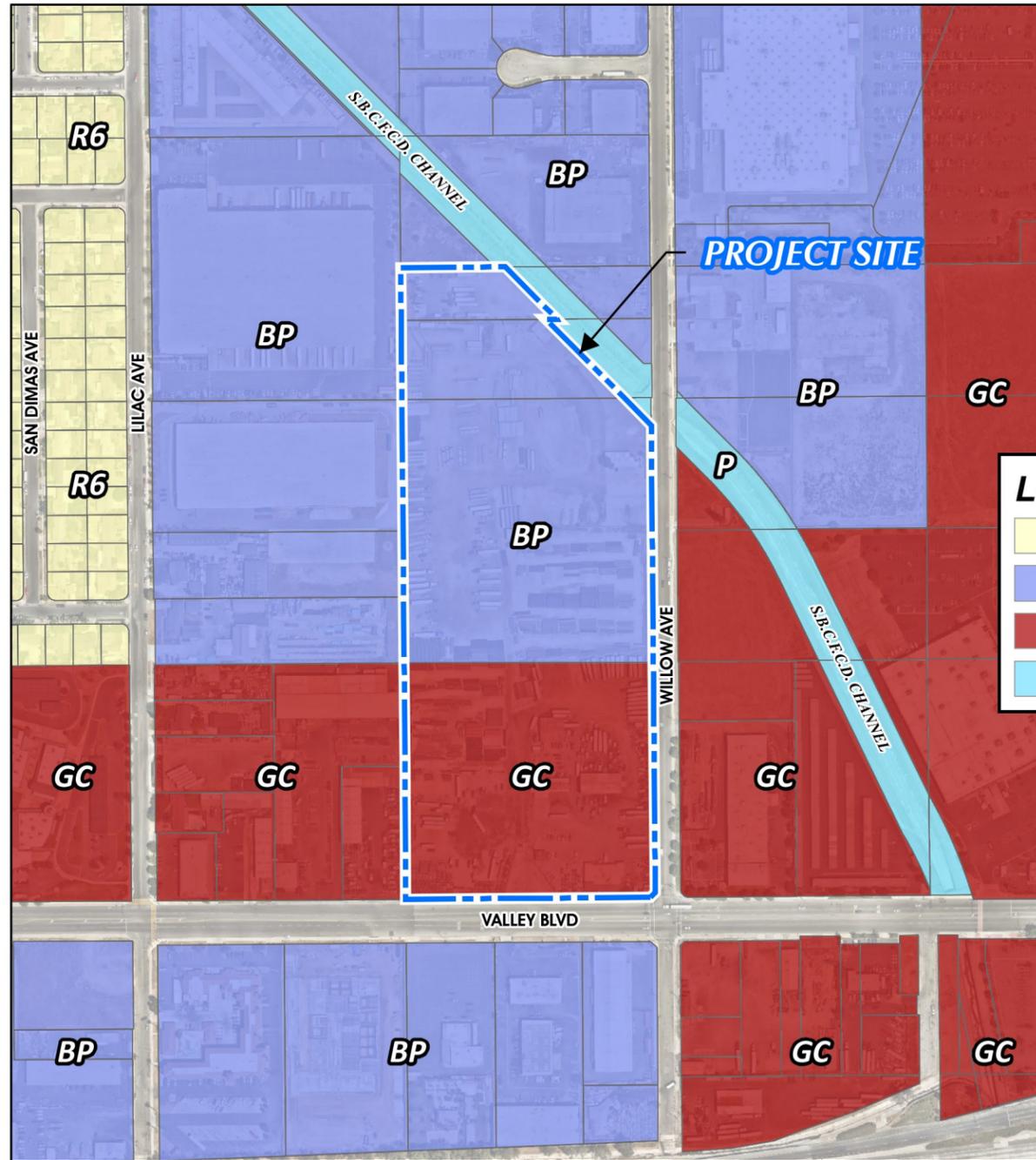
Source(s): ESRI, Nearthmap Imagery (2020), SB County (2020)

Figure 2-4

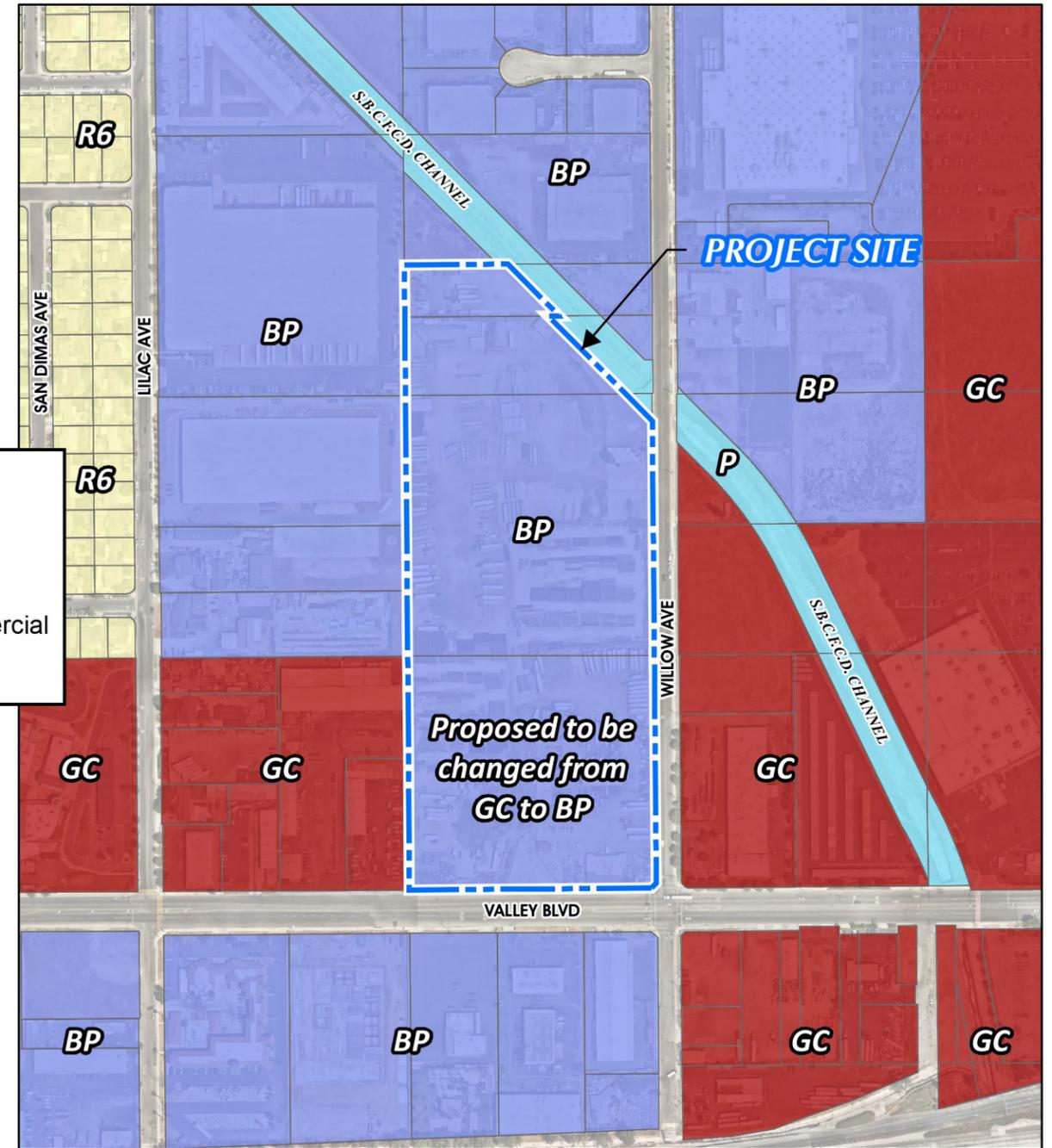


Aerial Photograph

Existing



Proposed



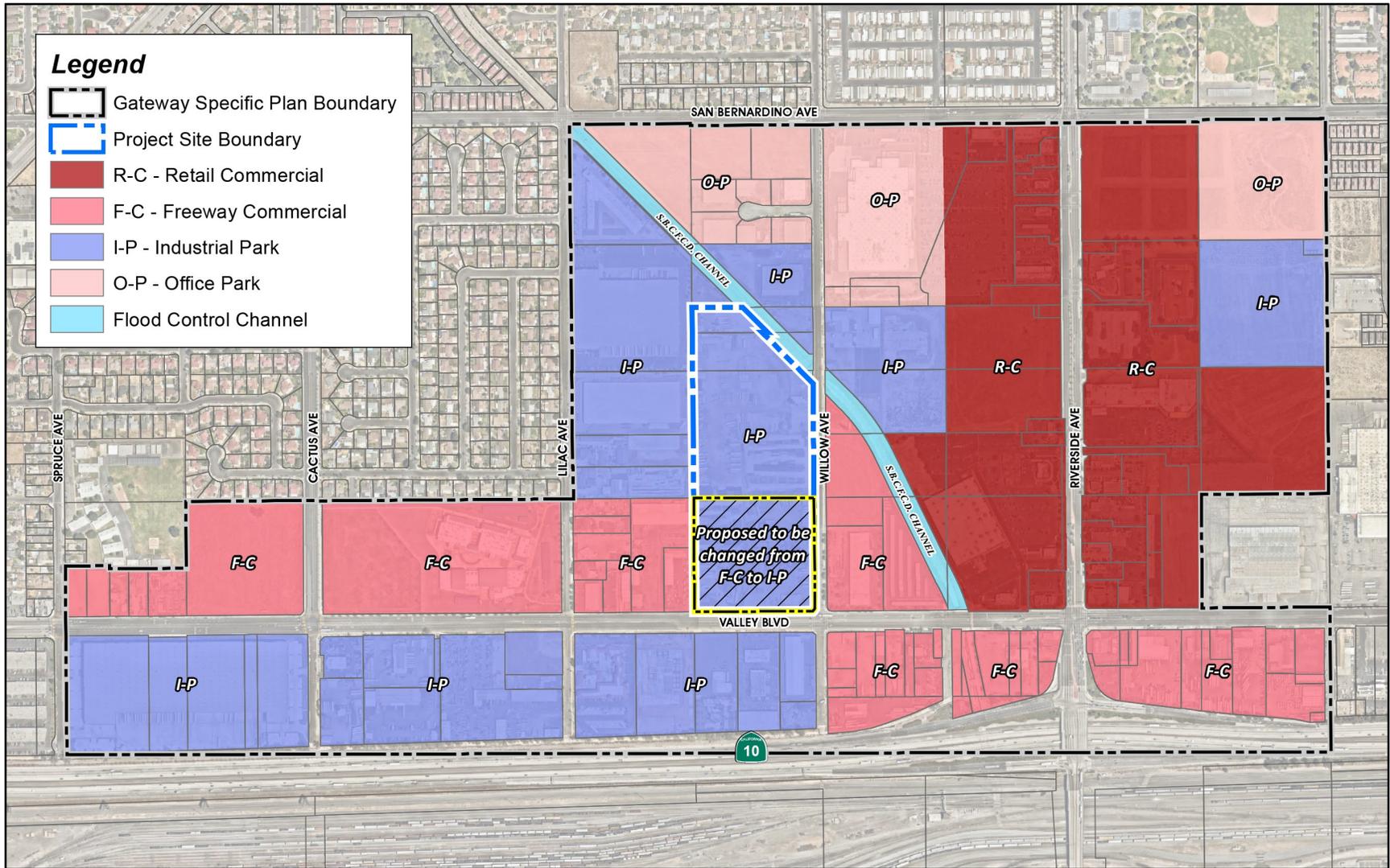
Legend

- R6 - Residential 6
- BP - Business Park
- GC - General Commercial
- P - Public Facility

Source(s): City of Rialto (2010), ESRI, Nearmap Imagery (2020), SB County (2020)

Figure 2-5



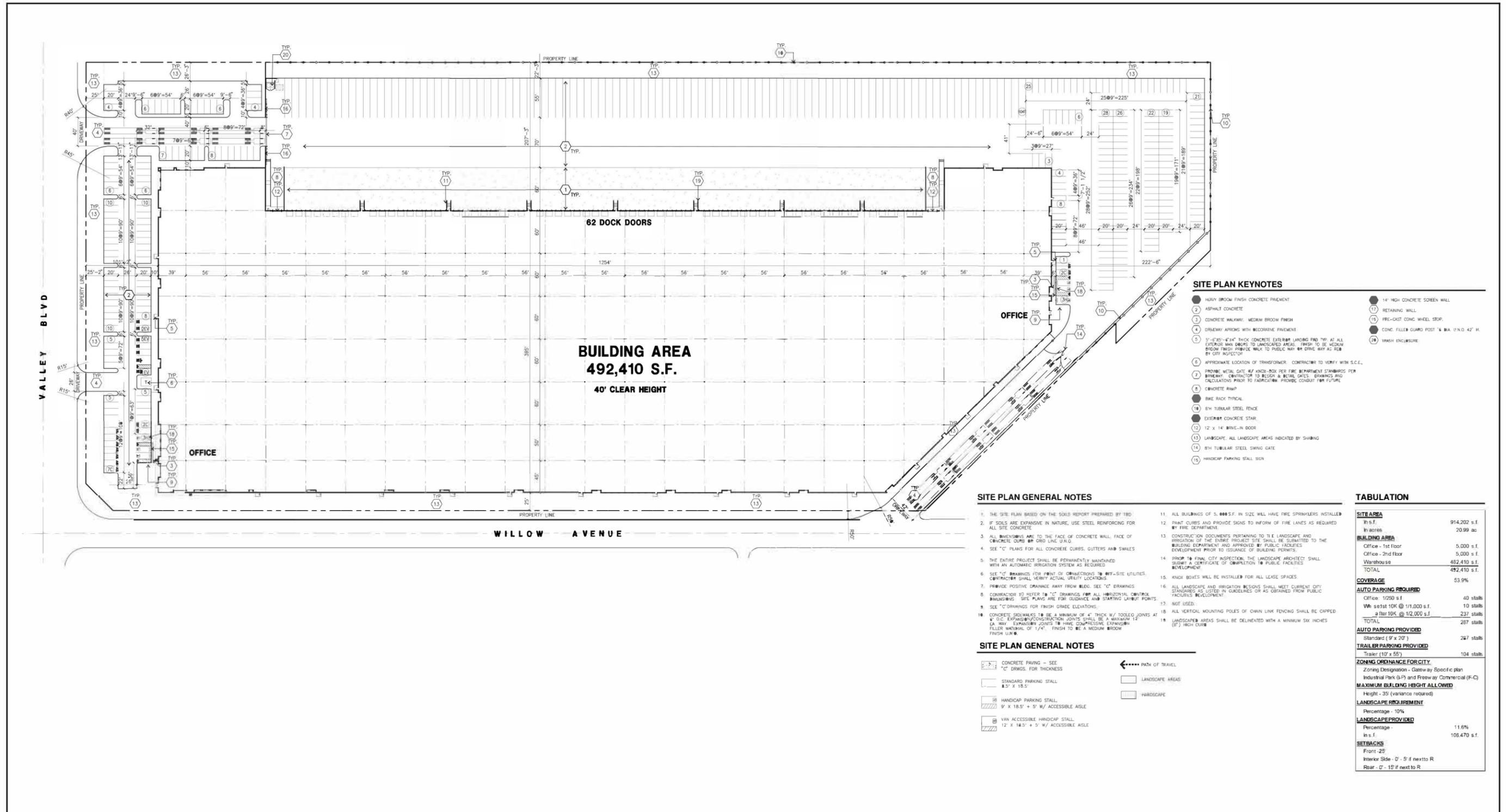


Source(s): City of Rialto (2010), ESRI, Nearmap Imagery (2020), SB County (2020)

Figure 2-6

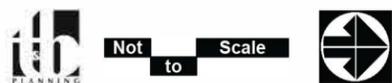


Proposed Specific Plan Amendment



Source(s): HPA (05-26-2021)

Figure 2-7



D. Variance No. 2020-0001

Variance No. 2020-0001 is a proposed exception to the 35-foot height limit within the Gateway Specific Plan’s “Industrial Park” zone. When the Gateway Specific Plan was adopted 31 years ago, the technological advances and modern business practices of today’s warehouse distribution industry could not be contemplated and the variance to the height limit is required to ensure the proposed building can provide an interior clear height that meets the needs of modern warehouse distribution users. In addition, the proposed Variance provides an exception to Rialto Municipal Code Section 18.61.250(E) to allow less than a 10-foot-wide landscape strip along segments of the Project site’s northern boundary. The reduction in landscaping along the northern site boundary is necessary to accommodate the City’s request for an additional access lane for inbound trucks so that truck queueing will occur on-site and not spill onto Willow Avenue.

E. Lot Merger No. 2021-0002

The proposed lot merger would combine the subject property’s four existing parcels – APNs 0254-261-14, 0254-261-17, 0132-201-03, and 0132-181-01 – into a single parcel.

3.0 ENVIRONMENTAL CHECKLIST AND ANALYSIS

Provided on the following pages is an Environmental Checklist, based on Appendix G of the CEQA Guidelines. The Checklist evaluates the Project's potential to result in significant adverse effects to the physical environment. As concluded in the Checklist, the proposed Project has the potential to result in significant environmental effects for which feasible mitigation may not be available to reduce those effects below levels of significance. Accordingly, and pursuant to CEQA Guidelines § 15063(b)(1), an **Environmental Impact Report (EIR)** will be prepared for the Project.



**INITIAL STUDY/
ENVIRONMENTAL CHECKLIST FORM
CITY OF RIALTO**

1. **Project Title:** Birtcher Logistics Center Rialto
2. **Lead Agency Name and Address:** City of Rialto Community Development Department, Planning Division, 150 S. Palm Avenue, Rialto, CA 92376
3. **Contact Person and Phone Number:** Daniel Casey, Senior Planner, (909) 820-2525 ext. 2075
4. **Project Location:** Northwest corner of the intersection of Valley Boulevard and Willow Avenue. Assessor Parcel Numbers (APNs): 0254-261-14, 0254-261-17, 0132-201-03, and 0132-181-01.
5. **Project Sponsor's Name and Address:** QR Birtcher Willow Ave. Owner LLC, 450 Newport Center Drive Suite 220, Newport Beach, CA 92660
6. **General Plan Designation:** Business Park (BP) and General Commercial (GC)
7. **Zoning:** Gateway Specific Plan – Industrial Park (I-P) and Freeway Commercial (F-C)
8. **Description of the Project:** The Project involves the construction and operation of an approximately 492,410 s.f. warehouse distribution building on an approximately 21.0-acre property. Discretionary approvals requested from the City of Rialto include General Plan Amendment No. 2020-0001, Specific Plan Amendment No. 2020-0001, Conditional Development Permit No. 2020-0006, Precise Plan of Design No. 2020-0012, Variance No. 2020-0001, and Lot Merger No. 2021-0002.
9. **Surrounding Land Uses and Setting:** Vacant, undeveloped land abuts the Project site to the north. A man-made storm drain channel also abuts a portion of the Project site to the north. Immediately to the south of the Project site is Valley Boulevard. On the south side of Valley Boulevard is a vacant industrial building, a building housing several auto repair workshops, and an office building. Properties abutting the Project site on the west are occupied by a variety of uses, including warehouse buildings, truck parking, construction materials fabrication and storage. Immediately east of the Project site is Willow Avenue. East of Willow Avenue is vacant, undeveloped land and an industrial building.
10. **Other public agencies whose approval is required:** Santa Ana Regional Water Quality Control Board (NPDES Permit). Additional approvals from public agencies, if required, will be described in the required Environmental Impact Report.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? The City of Rialto is required to consult with interested California Native American tribes regarding the Project pursuant to Senate Bill 18 (SB18) and Assembly Bill 52 (AB52). Consultation efforts are on-going and results of the consultation will be disclosed in the Environmental Impact Report.

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 checked="" type="checkbox"/>	Aesthetics	<input checked="" type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Agricultural Resources and Forestry Resources	<input checked="" type="checkbox"/>	Hazards & Hazardous Materials	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Air Quality	<input checked="" type="checkbox"/>	Hydrology/Water Quality	<input checked="" type="checkbox"/>	Transportation
<input type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Land Use/Planning	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input checked="" type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Mineral Resources	<input checked="" type="checkbox"/>	Utilities/Service Systems
<input checked="" type="checkbox"/>	Energy	<input checked="" type="checkbox"/>	Noise	<input type="checkbox"/>	Wildfire
<input checked="" type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Population/Housing	<input checked="" 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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input checked="" type="checkbox"/>
I find that the proposed project MAY have a "potential significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>

Signature



7-20-2021

Date

Daniel Casey, Senior Planner

Printed Name

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect 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: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less 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 Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analysis 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 analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	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 210999, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Rialto, 2010a; Google Earth, 2021; Project Application Materials)</i>				
<p>No designated scenic vistas or scenic corridors are located in the vicinity of the Project site (Rialto, 2010a, pp. 2-22, 2-53; Google Earth, 2021). Distant views of the Jurupa Hills and La Loma Hills are available from the segments of Valley Boulevard and Willow Avenue that abut the site, looking south/southeast; however, the Project would not make any improvements that would encroach within Valley Boulevard and/or Willow Avenue and obstruct south/southeast-facing views. The San Bernardino Mountains are partially visible from the Valley Boulevard segment that abuts the Project site looking north; however, the mountains are largely obstructed by existing structures and improvements (e.g., signage, power poles) on the Project site. The visibility – or lack thereof – of the San Bernardino Mountains from public viewing areas along the Project site would not change substantially with implementation of the Project. Accordingly, given the fact that the Project site is not a scenic vista, is not located near a designated scenic resource, and unique, prominent and scenic views would not be obscured by the Project, implementation of the Project would not have a substantial adverse effect on a scenic vista and less-than-significant impacts would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the Project’s EIR.</p>				
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: Caltrans, 2017; Google Earth, 2021; Project Application Materials)</i>				
<p>The Project site is not located within or adjacent to a scenic highway corridor and there are no State-designated or eligible scenic highways within the vicinity of the Project site. The nearest State-eligible scenic highway from the Project site is a segment of SR-38 located approximately 11.1 miles southeast of the Project site and the Project site would not be visible from this SR-38 segment due to distance and intervening development/topography (Caltrans, 2017; Google Earth, 2021). Accordingly, the Project site is not located within a State scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources within a State scenic highway corridor. Thus, no impact to a State scenic highway would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
<p>The Project site is located within an urbanized area, as defined by U.S. Census bureau and determined as part of the 2010 Census (U.S. Census Bureau, 2012). Thus, pursuant to this threshold, a potentially significant impact to visual</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
character only would occur if the Project were to conflict with applicable zoning (Gateway Specific Plan) and/or other City of Rialto regulations governing scenic quality. The Project requests a variance to development regulations that are applicable to the subject property. The potential for these modifications to conflict with or be incompatible with existing City regulations governing scenic quality will be addressed in the EIR for the Project.				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Rialto, 2020)</i></p> <p>The City of Rialto Municipal Code Section 18.61.140 includes development regulations for outdoor lighting that apply to all development in the City (Rialto, 2020). The Municipal Code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding public nuisances (e.g., blinking/flashing lights, unusually high intensity or bright lighting). As a condition of approval, the Project would be required to comply with the Rialto Municipal Code, including provisions applicable to outdoor lighting. The City of Rialto would confirm compliance with Municipal Code Section 18.61.140 as part of the building permit review process. Mandatory compliance with the City of Rialto Municipal Code would ensure that the Project does not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area and that a less than significant impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>II. AGRICULTURE AND FORESTRY RESOURCES</p> <p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. 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>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: CDC, 2016; Google Earth, 2021)</i></p> <p>According to mapping information available from the California Department of Conservation’s (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site contains “Urban and Built-Up Land” (CDC, 2016). Accordingly, the Project site does not contain any lands mapped by the FMMP as “Prime Farmland,” “Unique Farmland,” or “Farmland of Statewide Importance” and thus, implementation of the Project would not convert such Farmland to a non-agricultural use. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Rialto, 2010b, Rialto, 2013)</i></p> <p>The Project site is not subject to a land conservation (Williamson Act) contract (Rialto, 2010b, p. 56). In addition, the Project site is zoned for “Industrial Park (I-P)” and “Freeway Commercial (F-C)” land uses by the Gateway Specific Plan; therefore, implementation of the Project has no potential to conflict with existing zoning for an agricultural use (Rialto, 2013). No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Rialto, 2013)</i></p> <p>The Project site is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land (Rialto, 2013) . There are no lands located within the City of Rialto that are zoned for forest land, timberland, or timberland zoned Timberland Production (ibid.). Therefore, the Project has no potential to conflict with any areas currently zoned as forest, timberland, or Timberland Production and will not result in the rezoning of any such lands. As such, no impact will occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Rialto, 2013)</i></p> <p>The Project site does not contain a forest and is not designated as forest land; thus, the proposed Project will not result in the loss of forest land or the conversion of forest land to non-forest use (Rialto, 2013). As such, no impact will occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: CDC, n.d.)</i></p> <p>“Farmland” is defined in Section II (a) of Appendix G of the CEQA Guidelines as “Prime Farmland,” “Unique Farmland” or “Farmland of Statewide Importance” (“Farmland”). As disclosed above under Response II (a), the Project would not result in the conversion of Farmland to non-agricultural use (CDC, 2016).</p> <p>As discussed under Responses II (c) and II (d), the Project would not convert forest land to non-forest use. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				

	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: South Coast Air Quality Management District, 2017)</i>				
The Project site is located in the South Coast Air Basin. Air quality within the South Coast Air Basin is regulated by the South Coast Air Quality Management District (SCAQMD). Standards for air quality are documented in the SCAQMD's <i>Air Quality Management Plan (AQMP)</i> . The construction and operation of the Project would result in the emission of airborne pollutants into the Air Basin that have the potential to conflict with or obstruct implementation of the SCAQMD's <i>AQMP</i> . As such, an EIR will be prepared to evaluate the Project's potential to conflict with or obstruct the implementation of the adopted SCAQMD <i>AQMP</i> .				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: South Coast Air Quality Management District, 2016; South Coast Air Quality Management District, 2017)</i>				
The South Coast Air Basin is a non-attainment area for various State and federal air quality standards. The Project site is located in a portion of the South Coast Air Basin that is designated as a "Non-Attainment" area for the federal 8-hour ozone standard, the State 1-hour and 8-hour ozone standards, and federal and State particulate matter standards (SCAQMD, 2016). Particulate and gaseous emissions have the potential to be produced during the construction and operating life of the proposed Project. This would include emissions of criteria pollutants, including those that contribute to ozone formation, along with particulate matter. A quantitative analysis of Project-related emissions (both construction and operational) will be prepared to determine whether the Project would exceed SCAQMD daily emissions thresholds. The results of the analysis will be disclosed in the EIR for the Project.				
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: South Coast Air Quality Management District; Google Earth)</i>				
Construction and operation of the Project has the potential to expose sensitive receptors located near the Project site and/or along its primary truck route(s) to localized criteria pollutant emissions and/or diesel particulate matter (DPM) emissions from mobile sources (i.e., automobile/truck exhaust). These pollutants pose potential risks to human health. A quantitative analysis of Project-related emissions (both construction and operational) will be prepared to determine whether implementation of the Project would expose sensitive receptors to substantial pollutant concentrations. The results of the quantitative analysis will be disclosed in the Project's EIR.				
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
Any temporary odor impacts generated during Project-related construction activities, such as asphalt paving and the				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>application of architectural coatings, would be short-term and cease upon completion of the construction phase of the Project. The industrial use (warehouse distribution) proposed for the Project site is not expected to involve uses or activities that generate substantial or noticeable amounts of odor during long-term operation. Nonetheless, an EIR will be prepared to evaluate the Project's potential to expose substantial numbers of people to objectionable odors during both near-term construction and long-term operation.</p>				
<p>IV. BIOLOGICAL RESOURCES Would the project:</p>				
<p>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Google Earth, 2021)</i></p> <p>The Project site is completely disturbed and developed under existing conditions and has been so for at least 25 years (Google Earth, 2021). The entire Project site is covered by structures, pavement, gravel, or cleared, packed dirt and is used for parking and equipment/materials storage. No natural habitats or plant communities are present on the Project site and the Project site is not adjacent to any natural, undeveloped areas. Due to the existing conditions of the site, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>b) Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Google Earth, 2021)</i></p> <p>The Project site is completely disturbed and developed and does not contain riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service (Google Earth, 2021). As such, no impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Google Earth, 2021)</i></p> <p>The Project site is completely disturbed and developed and does not contain State or federally protected wetlands.</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Therefore, implementation of the Project would not have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: Google Earth, 2021)</i>				
The Project site is disturbed and does not support a diversity of native wildlife. The Project site is located in an urbanized area – paved roads, fencing, and developed land surrounding the Project site block terrestrial wildlife movement from all directions – and the site is not located adjacent to open space areas (Google Earth, 2021). Accordingly, the site is not expected to serve as a wildlife movement corridor. Furthermore, the Project site does not support vegetation that could be used by native or migratory birds as a nesting/nursery site. Based on the foregoing, implementation of the Project would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: Rialto, 2020; Google Earth, 2021)</i>				
The City of Rialto does not have any policies or ordinances protecting biological resources that are applicable to the Project site. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: CDFW, 2021.)</i>				
The Project site is not located in an area covered by a Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan has been adopted (CDFW, 2021). Accordingly, the Project has no potential to conflict with any such plans, and no impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
V. CULTURAL RESOURCES				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials; Google Earth, 2021)</i>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Although the Project site is not known to be associated with any important people or events in California history, a professional archaeologist will conduct archival research and document their findings in a cultural resources report. The cultural resources report will indicate whether Project implementation would cause a substantial adverse change in the significance of any historical resources. The results of the evaluation will be disclosed in the Project's EIR.				
b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials; Google Earth, 2021)</i>				
Although the Project site is developed/disturbed and not known to contain any archaeological resources or be associated with known archaeological sites, a professional archaeologist will conduct archival research and document their findings in a cultural resources report. The cultural resources report will indicate whether Project implementation would cause a substantial adverse change in the significance of any archeological resources. The results of the evaluation will be disclosed in the Project's EIR.				
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>(Source: California Health and Safety Code, Section 7050.5(b) & (c), Public Resources Code Section 5097.94(k) & 5097.98)</i>				
The Project site does not contain a cemetery, and no known formal cemeteries are located within the immediate vicinity. Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, Section 7050.5 "Disturbance of Human Remains." According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner determines the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants will complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to human remains, including human remains of Native American ancestry, would be less than significant.				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY				
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
Project-related construction and operational activities would use local energy resources, including gasoline, diesel fuel, and electricity. An energy resources analysis report will be prepared to evaluate whether implementation of the Project would result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. The findings of this report will be disclosed in the Project's EIR.				
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
The Project's potential to conflict with applicable plans, policies, or regulations related to renewable energy or energy efficiency will be analyzed in an energy resources analysis report, the results of which will be disclosed in the Project's EIR.				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: Rialto, 2010a; Google Earth, 2021)</i>				
There are no Alquist-Priolo Earthquake Fault Zones affecting the Project site; the nearest Earthquake Fault Zone is the San Jacinto Fault located approximately 4 miles northeast of the Project site (Google Earth, 2021; Rialto, 2010a, Exhibit 5-1). Because there are no known faults located on the Project site, there is no potential for the Project to expose people or structures to adverse effects related to ground rupture. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
(ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Rialto, 2010b; CBSC; Rialto, 2020)</i>				
The Project site is located in a seismically active area of Southern California and is expected to experience moderate-to-severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other properties throughout Southern California. As a Project condition of approval, the proposed warehouse distribution building is required to be constructed in accordance with the California Building Standards Code (CBSC), also				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
known as California Code of Regulations (CCR), Title 24 (Part 2), and the Rialto Building Code, which is based on the CBSC with local amendments. The CBSC and Rialto Building Code have been specifically tailored for California earthquake conditions and provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures. In addition, the CBSC and the City require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and implement the site-specific recommendations contained therein to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems. A geotechnical report will be prepared for the Project and its findings will be disclosed in the Project's EIR.				
(iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Rialto, 2010a)</i></p> <p>According to the City's General Plan Exhibit 5-1, <i>Seismic and Geologic Hazards</i>, the Project site is not located in an area with the potential for liquefaction. To confirm the lack of liquefaction potential, a geotechnical study will be prepared for the Project, which will evaluate the Project site's potential to be subject to seismic-related ground failure, including liquefaction. The results of the site-specific geotechnical evaluation will be disclosed in the Project's EIR.</p>				
(iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Google Earth, 2021; Project Application Materials)</i></p> <p>The Project site is relatively flat. No hillsides or steep slopes are present on or abutting the Project site. The Project includes manufactured slopes in several locations on the Project site. The proposed manufactured slopes are not expected to be subject to landslide during a seismic event because they would be designed and constructed in accordance with the design recommendations contained within the Project's geotechnical report and in accordance with best engineering practices. Notwithstanding, the Project's EIR will provide a detailed analysis of the susceptibility of proposed on-site manufactured slopes to seismic-related landslide hazards.</p>				
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>Project construction activities would disturb the Project site and expose subsurface soils, which would temporarily increase erosion susceptibility. The Project would be required to adhere to standard regulatory requirements, including, but not limited to, requirements imposed by the City of Rialto's National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit and a Project-specific Stormwater Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP) to minimize water pollutants including sedimentation in stormwater runoff. The EIR will evaluate the Project's potential to result in substantial soil erosion and/or the loss of topsoil.</p>				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>(Source: Project Application Materials)</i>				
Refer to Responses VII(a)(iii) and (iv) for a discussion of liquefaction and landslide hazards. The Project site's potential for lateral spreading or collapse is currently unknown, but will be evaluated in a site-specific geotechnical evaluation. The geotechnical evaluation also will evaluate the Project site's potential for subsidence and liquefaction hazards. An EIR will be prepared to evaluate the proposed Project's potential to cause soil subsidence, lateral spreading, liquefaction, and collapse hazards, which could pose a threat to the future structures and workers on-site.				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials; Rialto, 2010b)</i>				
According to the City's General Plan EIR, the majority of the City is underlain by granular soils that contain little clay and therefore have a low potential for expansion (Rialto, 2010b, p. 143). However, some areas of the City are underlain with soils that have a moderate potential for expansion (ibid.). The Project's geotechnical evaluation will evaluate the Project site's specific soil conditions and potential for containing expansive soils. The Project's potential to expose the future structures and workers on-site to hazards associated with expansive soils will be disclosed in the EIR.				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
The Project would not install any septic tanks or alternative waste water disposal systems. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Rialto, 2010b; Google Earth, 2021)</i>				
According to the City's General Plan EIR, the City of Rialto contains surface exposures of several sedimentary rock units including older fan deposits of middle to late Pleistocene age, which have high potential to contain unique paleontological resources (Rialto, 2010b, p. 114). The Project's EIR will evaluate whether the Project site is located in an area with high potential to contain unique paleontological resources and whether such resources could be impacted by Project construction activities.				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
Project-related construction and operational activities would emit air pollutants, several of which are regarded as				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
greenhouse gases (GHGs). A GHG emissions assessment will be prepared to quantify the GHG emissions resulting from implementation of the Project. The results of the GHG emissions assessment will be disclosed in the Project's EIR and the EIR will make a determination whether the Project-related GHG emissions have the potential to result in 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
The Project's potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases will be evaluated in the EIR for the Project.				
IX. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
During Project construction, limited amounts of hazardous materials typical of construction activities would be transported to, stored, and used on the Project site (e.g., fuel, lubricants, architectural coatings). Also, although future building user(s) are unknown at this time, hazardous materials may be used and stored on the Project site as part of routine business operations. An EIR will be prepared to evaluate the Project's potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during short-term construction and long-term operation.				
Furthermore, the Project site may contain contaminants from historical activities on the site that could pose a hazard to the public or the environment. An environmental site assessment (ESA) will be prepared for the Project site to evaluate the site for potential sources of contamination. The findings of the ESA will be disclosed in the EIR.				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
See Response IX(a), above. This topic will be addressed in the Project's EIR.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials; Google Earth, 2021)</i>				
There is one school located within one-quarter mile of the Project site: Joe Baca Middle School (Google Earth, 2021).				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
The Joe Baca Middle School is located approximately 0.13-mile west of the Project site (ibid.). The Project's EIR will evaluate the potential for implementation of the Project to result in substantial hazards to school children due to the emission or handling of hazardous or acutely hazardous materials and/or substances.				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials; DTSC, 2021)</i></p> <p>According to preliminary information provided by the California Department of Toxic Substances Control, the Project site is not located on the list of hazardous materials sites pursuant to Government Code Section 65962.5 (DTSC, 2021). Notwithstanding, an Environmental Site Assessment (ESA) will be prepared for the Project, which will include the results of governmental hazardous materials database search. The results of the ESA's database search will be disclosed in the Project's EIR.</p>				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: SBCALUC, 1991; Google Earth, 2021)</i></p> <p>The Project site is located approximately 4.0 miles southeast of the nearest runways at the Rialto Municipal Airport (Google Earth, 2021). The Project site is not located within a noise or safety hazard area for the Rialto Municipal Airport (SBCALUC, 1991, Figure II-3 and Figure III-7). Accordingly, implementation of the proposed Project would not result in an excessive airport-related noise or safety hazard for people working on the Project site. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials; Rialto, n.d.)</i></p> <p>The Project site does not contain any emergency facilities nor does it serve as an emergency evacuation route (Rialto, n.d.). During construction and long-term operation, the proposed Project would be required to maintain adequate emergency access for emergency vehicles to the site and along Valley Boulevard and Willow Avenue as required by the City. Because the proposed Project would not interfere with an adopted emergency response or evacuation plan, no impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: CalFire, 2020; and Project Application Materials)</i></p> <p>According to the California Department of Forestry and Fire Protection (CalFire), the Project area is not located within a</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
high fire hazard severity zone (CalFire, 2020). Accordingly, implementation of the proposed Project has no potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
Implementation of the Project would involve demolition, clearing, grading, paving, utility installation, building construction, and landscaping activities, which could result in the generation of waterborne pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project. Additionally, runoff from the Project site under post-development conditions could contain water pollutants. The City will require that best management practices (BMPs) to address water pollutants be identified in a Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP). The Project's potential to violate any water quality standards or waste discharge requirements during short-term construction and/or long-term operational activities, and the protective and avoidance measures proposed by the Project to address water quality will be fully analyzed in the required EIR.				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
The Project would be served with potable water from the municipal water system and the Project Applicant does not propose the use of any wells or other groundwater extraction activities. Therefore, the Project would not directly draw water from the groundwater table. Accordingly, implementation of the proposed Project has no potential to substantially deplete or decrease groundwater supplies and the Project's impact to groundwater supplies would be less than significant.				
Development of the Project site would increase impervious surface coverage on the Project site, which would, in turn, reduce the amount of water percolating down into the underground aquifer that underlies the Project site and a majority of the City and surrounding areas (i.e., Riverside-Arlington Subbasin). Percolation is just one of several sources of groundwater recharge for the Subbasin. The Project includes design features that would maximize the percolation of on-site stormwater runoff into the Riverside-Arlington Subbasin, such as underground infiltration chambers and permeable landscape areas. Based on the small size of the Project site in relation to the size of the groundwater basin and the design features proposed by the Project to allow percolation, implementation of the Project is determined to result in incremental changes to local percolation and would not result in substantial adverse effects to local groundwater recharge. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Applications Materials)</i></p> <p>During construction of the Project, surface and subsurface soils on the Project site would be exposed and subject to wind and/or water erosion. The Project Applicant would be required to adhere to standard regulatory requirements to minimize water pollutants including sedimentation in stormwater runoff, including, but not limited to, requirements imposed by the City of Rialto's National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit and a Project-specific Stormwater Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP). Mandatory compliance with these standard regulatory requirements are expected to preclude substantial adverse environmental effects related to erosion or siltation. Notwithstanding, the EIR will evaluate the potential for Project implementation to result in substantial soil erosion.</p>				
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>A hydrology study will be prepared to evaluate whether implementation of the Project would result in a substantial change in the rate or amount of runoff from the site. Any increase in the rate or amount of runoff from the site could result in increased potential for flooding on downstream properties. The results of the hydrology study will be disclosed in the EIR.</p>				
(iii) Create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>As indicated under Response X(a), the Project's potential to result in sources of polluted runoff will be disclosed and evaluated in the required EIR. A hydrology study will be prepared for the Project to evaluate the Project's proposed stormwater drainage system; the hydrology study will identify if the existing stormwater drainage system can adequately accept stormwater runoff from the Project site or if improvements are needed. The findings of the hydrology study will be disclosed in the EIR.</p>				
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials; FEMA, 2008)</i></p> <p>According to FEMA Flood Insurance Rate Map (FIRM) Nos. 06071C8659H and 06071C8678J, the Project site is located within "Zone X (unshaded)," which is an area with less than a 0.2% chance of annual flood (FEMA, 2008). The Zone X (unshaded) designation is considered to be an area of minimal flood hazard and is not considered a special flood hazard area. Accordingly, the Project site is not expected to be inundated by flood flows during the lifetime of the Project and the Project would not impede or redirect flood flows. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials; FEMA, 2008; Google Earth, 2021)</i></p> <p>The Pacific Ocean is located over 46 miles southwest of the Project site; consequently, there is no potential for the Project site to be impacted by a tsunami as tsunamis typically only affect areas in proximity to the coastline (Google Earth, 2021). The Project site also is not subject to flooding hazards associated with a seiche because the nearest large bodies of surface water (Lake Mathews and Lake Arrowhead) are located approximately 15 miles away from the Project site (Google Earth, 2021). Furthermore, there are no dams upstream of the Project site. Accordingly, the Project would not release water pollutants due to inundation from a tsunami, seiche, or dam inundation. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials, DWR, n.d.)</i></p> <p>As indicated under Response X.(b), implementation of the Project would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge.</p> <p>The Project site is located within the portion of the Riverside-Arlington Subbasin that is adjudicated under the 1969 Western-San Bernardino Judgment (DWR, n.d.). Adjudicated basins, like the Riverside-Arlington Subbasin are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) because such basins already operate under a court-ordered management plan to ensure the long-term sustainability of the subbasin. No component of the Project would obstruct with or prevent implementation of the management plan for the Riverside-Arlington Subbasin. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.</p>				
XI. LAND USE AND PLANNING				
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials; Google Earth, 2021)</i></p> <p>Under existing conditions, the Project site is developed as outdoor storage for trailers, construction equipment, and construction materials, and contains several outbuildings used for storage and offices. No residential communities are present on or adjacent to the Project site (Google Earth, 2021). The Project site does not provide access to established communities and would not isolate any established communities or residences from neighboring communities. Development and operation of the Project would thus not physically disrupt or divide the arrangement of an established community. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Project Application Materials)</i>				
The Project includes a General Plan Amendment (to amend the Land Use Policy Plan) and an amendment to the Gateway Specific Plan (to amend the Land Use Plan and development regulations/standards applicable to the Project site). The EIR will evaluate the Project for consistency with the General Plan, Gateway Specific Plan, and other applicable land use plans, policies, and/or regulations adopted for the purpose of reducing or avoiding environmental effects. If any inconsistencies are identified, the EIR will determine if the inconsistency will result in a substantial environmental effect.				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Rialto, 2010a; Rialto, 2010b)</i>				
The majority of the Project site is located within Mineral Resource Zone 3 (MRZ 3), which is a designation placed upon areas where the significance of mineral deposits is unknown (Rialto, 2010a, Exhibit 2.7). A sliver of the Project site abutting Willow Avenue is located within Mineral Resource Zone 2 (MRZ 2), which is a designation placed upon areas where mineral resources are likely present (Rialto, 2010a, Exhibit 2.7). The MRZ-2 classification is applied to a portion of the Project site due to the likely presence of Plain Cement Concrete (PCC)-grade aggregate resources (ibid.). Despite the potential presence of PCC-grade aggregate resources on a small portion of the Project site, the potential deposits on and abutting the Project site are not classified as a regionally-significant deposit (Rialto, 2010a, Exhibit 2.6). Thus, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California. Accordingly, a less-than-significant impact would occur and no further analysis of this subject is required.				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>(Source: Rialto, 2010a; Rialto, 2010b)</i>				
Please refer to the response to Response XII(a), above. Impacts would be less than significant and no further analysis of this subject is required.				
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
standards of other agencies?				
<p><i>(Source: Project Application Materials; Rialto, 2020)</i></p> <p>Project construction and operational activities may expose persons in the vicinity of the Project site and/or its primary truck route to noise levels in excess of standards for residential and/or worker receptors established by the City's General Plan and/or Chapter 9.50, "Noise Control," of the City's Municipal Code. An acoustical analysis will be prepared to quantify the noise effects associated with the Project and the results of the analysis will be disclosed in the EIR.</p>				
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>Construction activities on the Project site may produce groundborne vibration or groundborne noise levels during demolition, earthwork/grading and/or during the operation of heavy machinery. The acoustical analysis will quantify the vibration/groundborne noise levels expected from Project construction and the EIR will determine if the expected vibration levels are considered excessive. Long-term operation of the proposed Project is not anticipated to result in perceptible levels of groundborne vibration or groundborne noise; regardless, the EIR will also evaluate the Project's potential to generate excessive groundborne vibration and noise in the long-term.</p>				
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Google Earth, 2021; SBCALUC, 1991)</i></p> <p>The Project site is located approximately 4.0 miles southeast of the Rialto Municipal Airport (Google Earth, 2021). According to the Rialto Airport Comprehensive Land Use Plan, the Project site is located outside of the 60 dBA CNEL noise contour and would not be subjected to excessive noise levels due to operations at the Rialto Municipal Airport (SBCALUC, 1991, Figure II-3). Implementation of the Project would not expose people working on the Project site to excessive noise levels from operations at the Rialto Municipal Airport. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>XIV. POPULATION AND HOUSING</p> <p>Would the project:</p>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: U.S. Bureau of Labor Statistics, 2020; SCAG, 2019)</i></p> <p>The proposed Project would result in development of the subject property with industrial land uses that would add</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>employment opportunities to the area. It is anticipated that the employment base for both the construction and operational phases of the Project would come from the existing population in the Inland Empire, which comprises western Riverside County and southwestern San Bernardino County. According to the Bureau of Labor Statistics, the Riverside-San Bernardino-Ontario region’s civilian labor force contains approximately 2,071,914 persons with approximately 1,908,605 people employed and an unemployment rate of approximately 8% (approximately 163,309 persons) (USBLS, 2020). Accordingly, the Project region contains an ample supply of potential employees under existing conditions and the Project’s labor demand is not expected to draw substantial numbers of new residents to the area. Furthermore, approximately 92% of City of Rialto residents commute outside of the City for work (SCAG, 2019, p. 21); therefore, the Project would provide job opportunities closer to home for existing and future Rialto residents.</p> <p>There are no components of the Project that would reasonably result in indirect or unplanned population growth because the surrounding area is mostly developed under existing conditions or planned for development by the Gateway Specific Plan. The Project would install new/expanded infrastructure; however, this infrastructure would either be master-planned facilities (meaning the facilities would be installed with or without the Project) or private facilities for the sole use of the Project (meaning they would not be available for general public use). Accordingly, no significant indirect impacts associated with population growth would result from any Project-related improvements because the Project and its required improvements would not induce substantial growth within surrounding areas.</p> <p>Based on the foregoing analysis, neither the Project nor any Project-related component would result in substantial, direct, or indirect population growth that would cause a significant direct or indirect impact to the environment. Impacts would be less than significant. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</p> <p><i>(Source: Google Earth, 2021; Project Application Materials)</i></p> <p>Under existing conditions, the Project site is completely developed as outdoor storage for trailers, construction equipment, and construction materials, and contains several outbuildings used for storage and offices. The removal of these structures would not result in the displacement of substantial numbers of existing people or housing and would not necessitate the construction of replacement housing elsewhere. As such, no impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>XV. PUBLIC SERVICES</p> <p>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?</p>				
<p>a) Fire protection?</p> <p><i>(Source: Rialto, 2020; Google Earth, 2021)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>The Rialto Fire Department provides fire protection service to the Project area from Station 205, which is located at 1485 S. Willow Avenue – across the street from the Project site (Google Earth, 2021). Based on the Project site’s proximity to Station 205, this station will be able to adequately meet the Project’s demand for fire protection services and implementation of the Project would not result in the need for new, expanded, or unplanned facilities would be required.</p> <p>The Project is required to comply with the provisions of the City’s Development Impact Fee (DIF) Ordinance (Municipal Code Chapter 3.33), which requires a fee payment that the City applies to the funding of fire protection facilities. The City will collect DIF from the Project Applicant at the time of building permit issuance (based on building square footage). The Project’s payment of DIF, as well as increased tax revenues that would result from development of the Project, would be used by the City to help pay for fire protection services and other public services.</p> <p>The Project would incorporate fire prevention and fire suppression design features to minimize the potential demand placed on the Rialto Fire Department. The proposed warehouse distribution building would be of concrete tilt-up construction. Concrete is non-flammable and concrete tilt-up buildings have a lower fire hazard risk than wood-frame construction. The Project also would install fire hydrants on-site and would provide paved primary and secondary emergency access to the Project site to support the Rialto Fire Department in the event fire suppression activities are needed on-site. Lastly, the proposed warehouse distribution building would be equipped with fire sprinklers in accordance with the California and Rialto building codes. Based on its size and scale, the proposed building would likely feature Early Suppression, Fast Response (ESFR) ceiling mounted fire sprinklers (or a comparable fire suppression system) that exceed the fire protection of traditional sprinkler systems. ESFR high output, high volume systems are located in ceiling spaces as with conventional fire sprinkler systems, but they incorporate large, high-volume, high-pressure heads to provide the necessary fire protection for industrial buildings that may contain high-piled storage. While most other sprinklers are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean it will extinguish the fire but rather it is meant to "knock" the fire back down to its source.</p> <p>Based on the foregoing, the Project incorporates several design features to minimize fire hazards. Additionally, the Project would receive adequate fire protection service and would not result in the need for new or physically altered fire protection facilities and the Project Applicant would pay DIF and the Project would generate other revenues (e.g., tax) that would help offset the Project’s demand for fire protection services. Impacts to fire protection facilities would be less than significant. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>(Source: Rialto 2020; Google Earth, 2021)</p> <p>Implementation of the Project would result in an incremental increase in demand for police protection services relative to existing uses on the Project site, but the increase is not anticipated to be substantial and would not require or result in the construction of new or physically altered police facilities. The Project Applicant would be required to comply with the provisions of the City of Rialto’s Development Impact Fee (DIF) Ordinance (Municipal Code Chapter 3.33). This</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ordinance requires a fee payment that the City applies to the funding of public facilities, including police protection facilities. The City will collect the Project's DIF share from the Project Applicant at the time of building permit issuance (based on building square footage). The Project's payment of DIF fees, as well as increased tax revenues that would result from development of the Project, would be used by the City to help pay for police protection services and other public services. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities. Impacts to police protection facilities would therefore be less than significant. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials, California Legislative Information, 1998)</i></p> <p>Implementation of the Project would not create a direct demand for public school services, as the subject property would contain non-residential uses that would not generate any school-aged children requiring public education. The addition of employment-generating uses on the Project site would assist the City in achieving its goal to provide a better jobs/housing balance within the City (allowing more City residents to work within the City rather than commute elsewhere). Thus, the Project is not expected to draw a substantial number of new residents to the region and would therefore not indirectly generate new school-aged students in the City requiring public education. Because the Project would not directly generate students and is not expected to indirectly draw students to the area, the Project would not cause or contribute to a need to construct new or physically altered public school facilities. Although the Project would not create a demand for additional public school services, the Project Applicant would be required to contribute development impact fees to the Colton Joint Unified School District in compliance with California Senate Bill 50 (Greene), which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs (CA Legislative Info, 1998). Mandatory payment of school fees would be required prior to the issuance of a building permit. With mandatory payment of fees in accordance with California Senate Bill 50, impacts to public schools would be less than significant. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>As discussed under Responses XVI(a) and XVI(b) below, the proposed Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the proposed Project would not adversely affect any park facility. No impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The proposed Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, and animal shelters. As such, implementation of the proposed Project would not adversely affect other public facilities or require the construction of new or modified public facilities. No</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
further analysis is required; therefore, this issue will not be addressed in detail in the EIR.				
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, and no further analysis of this subject is required.</p>				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project does not include the construction of any new on- or off-site recreation facilities. The Project would not expand any existing off-site recreational facilities. Therefore, environmental effects related to the construction or expansion of recreational facilities would not occur with implementation of the proposed Project. Additional analysis of this issue is not required.</p>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>Implementation of the proposed Project would induce vehicular and non-vehicular travel to and from the Project site. A Project-specific traffic study will be prepared following the City of Rialto's traffic study guidelines. The study will quantify the volume of vehicular traffic anticipated to travel to and from the Project site. The EIR will disclose the findings of the traffic study and also will evaluate the Project's potential to conflict with applicable plans, ordinances, and policies addressing the circulation system and various modes of travel, including transit, roadway, bicycle and pedestrian.</p>				
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: CEQA Guidelines)</i></p> <p>Senate Bill 743 (SB 743), which was codified in Public Resources Code section 21099, required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>significance of transportation impacts must promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. To that end, in developing the criteria, the Governor's Office of Planning and Research proposed, and the California Natural Resources Agency certified and adopted, changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. Updates to the State CEQA Guidelines that were approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision (b) establishes criteria for evaluating a project's transportation impacts based on project type and using VMTs as the metric. The proposed Project would result in the generation of vehicle traffic, which could lead to a net increase in the amount of VMTs within the region. A Project-specific VMT analysis will be prepared. The Project's anticipated VMTs will be evaluated against applicable performance standards in conformance with SB 743 and CEQA Guidelines Section 15064.3(b). The results of the VMT analysis will be evaluated and disclosed in the Project's EIR.</p>				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project's EIR will provide a detailed analysis of whether the Project's design or operational characteristics will exacerbate any existing transportation/circulation hazards that may exist in the Project site vicinity or create any new hazards.</p>				
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>During the course of the City of Rialto's design review process, the City will review the proposed site plan to ensure that the Project provides adequate access to-and-from the Project site for emergency vehicles. The City also will review the layout of the proposed building, drive aisles, parking lots, and truck courts to ensure adequate on-site paths of travel for emergency vehicles. Furthermore, the City of Rialto will review all future Project construction drawings to ensure that adequate emergency access is maintained on the abutting segments of Valley Boulevard and Willow Avenue. Impacts would be less than significant.</p>				
<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 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>A records search will be conducted by a professional archaeologist to determine if the Project site contains resources</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
that are listed or eligible for listing on a State or local register of historical resources as defined in Public Resources Code Section 5020.1(k). The results of the records search will be disclosed in the required EIR.				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The City of Rialto will send notification of the proposed Project to Native American tribes with traditional or cultural affiliation to the Project area in accordance with the requirements of SB 18 and AB 52 and will consult with interested tribes regarding the Project's potential to affect a tribal cultural resource. The Project's potential to cause a substantial adverse change in the significance of a tribal cultural resource will be addressed in the EIR.</p>				
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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The proposed Project would be required to construct utility service improvements as necessary to serve the Project. The EIR will describe the Project's proposed utility service facilities, and will evaluate whether the construction of such facilities would result in significant environmental effects.</p>				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials; WSC, 2016)</i></p> <p>Water service is provided to the Project area by Rialto Water Services. Projected water demands through 2040 for Rialto Water Services' service area under normal, historic single-dry and historic multiple-dry year conditions are documented in the 2015 San Bernardino Valley Regional Urban Water Management Plan (UWMP). Forecasts for projected water demand in the 2015 San Bernardino Valley Regional UWMP are based on the population projections of the Southern California Association of Governments (SCAG), which rely on the adopted land use plans contained within the general plans that cover the UWMP's geographic area. However, because the Project seeks to implement land uses that vary slightly from the adopted general plan land use plan (the Project proposes industrial land uses over the entire Project site instead of the mix of industrial and commercial land uses provided by the General Plan), the water demand associated with the Project may not have been adequately anticipated by the 2015 San Bernardino Valley Regional</p>				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>UWMP. Therefore, there is the potential that implementation of the Project could exceed the water demand projections from the 2015 San Bernardino Valley Regional UWMP – and may also exceed existing entitlements/resources – and that would require new or expanded entitlements. Potential impacts related to the Project’s water demand will be evaluated in the required EIR.</p>				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>Wastewater generated on the Project site would be conveyed to the Rialto Wastewater Treatment Plant (RWTP) for treatment. The Project’s EIR will evaluate the adequacy of the RWTP’s existing capacity and will determine whether any new or expanded treatment facilities are required to serve the Project in addition to the RWTP’s existing commitments.</p>				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. The required EIR will evaluate whether existing landfills have adequate capacity to accommodate the Project’s planned increase in solid waste generation.</p>				
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project would be required to comply with the City of Rialto’s waste reduction programs, including recycling and other diversion programs to divert the amount of solid waste deposited in landfills. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the proposed Project would provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. The implementation of these programs would reduce the amount of solid waste generated by the proposed Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project would comply with all applicable solid waste statutes and regulations; as such, a less-than-significant impact would occur. No further analysis is required; therefore, this issue will not be addressed in detail in the EIR.</p>				
<p>XX. WILDFIRE</p> <p>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</p>				
a) Substantially impair an adopted emergency response plan or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><i>(Source: CalFire, 2020)</i></p> <p>The Project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones (CalFire, 2020); therefore, the Project would not exacerbate existing wildfire hazard risks or expose people or the environment to adverse environmental effects related to wildfires. No impact would occur and no further analysis of this subject is required.</p>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The Project is completely developed/disturbed and, therefore, would not have the potential to 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Notwithstanding, implementation of the Project has the potential to damage or destroy archaeology resources that are examples of the major periods of California history or prehistory. The Project's EIR will evaluate the potential for Project implementation to degrade the quality of the environment and/or result in substantial adverse effects to cultural resources.</p>				
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p><i>(Source: Project Application Materials)</i></p> <p>The Project site is located within the City of Rialto and the City and other nearby cities and unincorporated areas of San Bernardino County and Riverside County have a number of on-going development projects. Development of the Project site, in addition to concurrent construction and operation of other development projects in the area, has the potential to result in cumulatively considerable impacts, particularly with respect to the following issue areas: air quality, greenhouse gas emissions, noise, and transportation. The EIR will evaluate the Project's potential to result in cumulatively considerable contributions to cumulatively significant impacts.</p>				
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><i>(Source: Project Application Materials)</i></p> <p>The potential for the proposed Project to directly or indirectly affect human beings will be evaluated in the required EIR particularly with respect to the following issue areas: air quality and greenhouse gas emissions (including emissions from Project-related traffic), seismic activity, and noise.</p>				

4.0 REFERENCES

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

<u>Cited As</u>	<u>Reference</u>
CA Legislative Info, 1998	California Legislative Information, 1998. <i>Senate Bill No. 50</i> . August 27, 1998. Available on-line at: http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_bill_19980827_chaptered.html
CalFire, 2020	California Department of Forestry and Fire Protection, 2018. FHSZ Viewer. Available on-line at: https://egis.fire.ca.gov/FHSZ/ .
Caltrans, 2017	California Department of Transportation, 2017. <i>California State Scenic Highway System Map</i> . February 25, 2017. Available on-line at: https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983
CBSC, 2020	California Building Standards Code, 2020. <i>2019 California Building Standards Code</i> . January 1, 2020. Available on-line at: https://www.dgs.ca.gov/BSC/Codes .
CDC, 2016.	California Department of Conservation, 2016. <i>California Important Farmland Finder</i> . Available on-line at: https://maps.conservation.ca.gov/DLRP/CIFF/ .
CDFW, 2021	California Department of Fish and Wildlife, 2021. <i>NCCP Plan Summaries</i> . Available on-line at: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans
DTSC, 2021	Department of Toxic Substances Control, 2021. <i>Hazardous Waste and Substances Site List (Cortese)</i> . Available on-line at: https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29
DWR, n.d.	California Department of Water Resources, n.d. <i>Adjudicated Basin Annual Reporting</i> . Available on-line at: https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin

- FEMA, 2008 Federal Emergency Management Agency, 2008. FEMA Flood Insurance Rate Map Nos. 06071C8659H and 06071C8678J. August 28, 2008. Available on-line at: <https://msc.fema.gov/portal>
- Google Earth, 2021 Google Earth, 2021. Available: <https://www.google.com/earth/>.
- Project Application, 2021 Project Application Materials, 2021. *Birtcher Rialto Application Materials*. Print.
- Rialto, 2010a City of Rialto, 2010a. *City of Rialto General Plan*. December 2010. Available on-line at: <http://yourrialto.com/wp-content/uploads/2016/08/General-Plan-Update-2010.pdf>.
- Rialto, 2010b City of Rialto, 2010b. *City of Rialto General Plan Update Draft Environmental Impact Report*. March 2010.
- Rialto, 2013 City of Rialto, 2013. *City of Rialto Official City Zoning Map*. March 19, 2013. Available on-line at: <https://www.yourrialto.com/wp-content/uploads/2015/06/Zoning-Map.pdf>.
- Rialto, 2020 City of Rialto, 2020. *Rialto Municipal Code*. Available on-line at: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=RIALTO_CALIFORNIAMUCO
- Rialto, n.d. City of Rialto, n.d. *City of Rialto Standard Emergency Management System (SEMS) Multi-Hazard Functional Plan (MHFP)*. Available on-line at: <https://www.yourrialto.com/wp-content/uploads/2017/01/EOP-2013.pdf>
- SBCALUC, 1991 San Bernardino County Airport Land Use Commission, 1991. *Final Comprehensive Land Use Plan Rialto Municipal Airport*. January 1991. Available on-line at: <http://www.sbcounty.gov/Uploads/lus/Airports/Rialto.pdf>.
- SCAQMD, 2016 South Coast Air Quality Management District, 2016. *National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin*. February 2016. Available on-line at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf>.
- SCAQMD, 2017 South Coast Air Quality Management District, 2017. *Air Quality Management Plan*. March 2017. Available on-line at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>

U.S. Census Bureau, 2012 United States Census Bureau, 2012. *2010 Census – Urbanized Area Reference Map: Riverside San Bernardino, CA*. March 11, 2012. Available on-line at: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside-san_bernardino_ca/DC10UA75340.pdf

USBLS, 2020 United States Bureau of Labor Statistics, 2020. *Riverside-San Bernardino-Ontario, CA Metropolitan Statistical Area*. December 2020. Available on-line at: https://data.bls.gov/timeseries/LAUMT064014000000006?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true



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Notice of Preparation of a Draft Environmental Impact Report for the Birtcher Logistics Center Rialto

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions⁸. According to the MATES IV Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 970 in one million⁹. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁸ South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Available at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>.

⁹ South Coast AQMD. MATES IV Estimated Risk. Accessed at: <https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f>.

Reporting Plan for the 2016 Air Quality Management Plan¹⁰, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy¹¹.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹² and the Heavy-Duty Low NOx Omnibus Regulation¹³, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹⁴ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.

¹⁰ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹¹ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsoocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹² CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹³ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹⁴ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO_x) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 492,410-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹⁵. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage¹⁶.

¹⁵ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹⁶ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

SBC210727-03

Control Number

Good evening,

I'm speaking on behalf of Californians Allied for a Responsible Economy, or C.A.R.E. CA. this evening.

C.A.R.E. CA's mission is to ensure that development projects across California minimize environmental and public health impacts and ensure community benefits, including the advancement of the cause of the skilled construction workforce, a unique and invaluable field which provides the engine for so much of this state's robust economic strength.

As a community coalition group we are interested in the public's health and safety, especially the health and safety of construction workers. We, therefore, have a particular interest in construction-related environmental issues including air pollution, noise, greenhouse gas emissions, and onsite soil contamination and hazardous materials.

We hope that the EIR will comprehensively address these issues.

We firmly believe that the decisions made by developers have, from their earliest stages, an enormous impact on our environment and community. We are always enheartened by developers who commit to pursuing the highest standards in construction and choose to supersede the environmental recommendations of a thorough EIR.

Thank you.



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Brendon Biggs, M.S., P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

Trevor Leja
Assistant Director

August 18, 2021

File: 10(ENV)-4.01

City of Rialto
Community Development Department-
Planning Division
Attn: Daniel Casey, Senior Planner
150 S. Palm Avenue
Rialto, CA 92376
dcasey@rialtoca.gov

Transmitted Via Email

RE: CEQA –NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BIRTCHEER LOGISTICS CENTER RIALTO PROJECT

Dear Mr. Casey:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on July 22, 2021** and pursuant to our review, we have the following comments:

Flood Control Planning & Water Resources Division (Michael Fam, Chief, 909-387-8120):

1. We are aware there may be storm drains in and around the site that may be affected by the proposed Project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the Rialto MPD, dated February 2009. It is to be used as a guideline for drainage in the area and is available at the San Bernardino County Department of Public Works - Flood Control Planning Section. Any revision to the drainage should be reviewed and approved by the Jurisdictional Agency (e.g. City). Additionally, impacts related to any proposed changes, and the mitigation for those impacts, should be included within the DEIR analysis.
2. The San Bernardino County Flood Control District (District) requests the City of Rialto condition the project proponent to dedicate (Quitclaim) to the District the following areas adjacent to the District's interim facility Rialto Channel:

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Fifth District

Leonard X. Hernandez
Chief Executive Officer

- a. An access easement given to the former property owner for access to their land-lock property APN: 0254-261-14 located on District's APN: 0254-261-24 (80-227537 OR) and; APN: 0254-261-14 the section of the property adjacent to Rialto Channel currently proposed for landscaping (see Proposed Site Plan). If you have any questions regarding this dedication request please contact Guy Winton, District Right-of-way at (909) 387-7962. Impacts and mitigation related to impacts incurred by the dedication should be included within the DEIR analysis.
3. According to the most recent FEMA Flood Insurance Rate Map (FIRM), Panels 06071C8659H, dated August 28, 2008, and 06071C8678J, dated September 2, 2016, the Project lies within Zone X (unshaded). Please include impacts and mitigation for those impacts related to the project's occurrence in Zone X in the DEIR.

Permits/Operations Support Division (Sameh Basta, Chief, 909-387-7995):

1. Portions of the Project are adjacent to the District right-of-way and facility. Any encroachments on the District's right-of-way or facilities, including but not limited to access, fencing and grading, utility crossings, landscaping, new and/or alteration to drainage connections will require a permit from the District prior to start of construction. The necessity for permits, and any impacts associated with physical changes needed should be addressed in the DEIR. If you have any questions regarding this process, please contact the District Permit Section at (909) 387-1863.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,



MICHAEL R. PERRY
Supervising Planner
Environmental Management

MP:AJ:nl



August 6, 2021

Via Email and U.S. Mail

City of Rialto
Attn: Daniel Casey
150 S Palm Ave.
Rialto, CA 92376
dcasey@rialtoca.gov

**RE: Public Records Act Request and Request for Mailed Notice of Public Hearings
and Actions – Birtcher Logistics Center, Willow Ave and Valley Blvd. Rialto, CA
92376**

Dear Mr. Casey,

CREED LA is writing to request a copy of any and all records related to the project, the Birtcher Logistics Center, located at Willow Avenue and Valley Boulevard in Rialto. The project will be the construction and operation of a distribution and logistics building with 492,400 square feet of space. We are also writing to request copies of all communications and mailed notice of any and all hearings and/or actions related to the Project.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

U.S. Mail

Jeff Modrzejewski
CREED LA
501 Shatto Place, Suite 200
Los Angeles, CA. 90020

Email

creedla@creedla.com

Please call me if you have any questions. Thank you for your assistance with this matter.

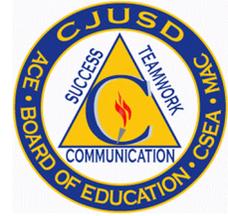
Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Modrzejewski", with a long horizontal flourish extending to the right.

Jeff Modrzejewski
Executive Director

Colton Joint Unified School District

Dr. Frank Miranda, Ed.D., Superintendent
Rick Jensen, Assistant Superintendent, Business Services
Owen Chang, Director, Facilities, Planning & Construction



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August 31, 2021

Daniel Casey, Senior Planner
City of Rialto
Community Development Department, Planning Division
150 South Palm Avenue
Rialto, CA 92376

Via Email: dcasey@rialto.ca.gov

Subject: Response to Notice of Preparation of a Draft Environmental Impact Report for the
 Birtcher Logistics Center Rialto Project

Dear Mr. Casey:

Colton Joint Unified School District (CJUSD) appreciates the opportunity to provide input on the environmental process for the Birtcher Logistics Center Project ("Project"). The Project is proposed on 21 acres and is adjacent to Valley Boulevard on the south and Willow Avenue on the east, in the City of Rialto. The Project proposes development of a 492,410-sf warehouse distribution building, a trailer truck court with 62 dock doors and 104 trailer parking stalls, and 287 passenger vehicle parking spaces. The trailer docks and trailer parking are proposed on the western side of the property, while the warehouse building would be on the eastern half. Vehicle access would be from two driveways on Valley Boulevard and Willow Avenue.

CJUSD Schools. CJUSD operates the following schools within one mile of the Project site:

- Joe Baca Middle School (1640 S Lilac Avenue), 685 feet to the west,
- Ruth Grimes Elementary School (1609 Spruce Avenue), 0.5 mile to the west, and
- Slover Mountain High School (18829 Orange Street), 1 mile to the southwest.

Rialto Unified School District also operates Simpson Elementary School (1050 South Lilac Avenue), approximately one-half mile north of the Project site.

Health Risks From Truck-related Pollution. With the proliferation of industry development within its boundaries, CJUSD is concerned about the health effects associated with truck-related pollution.

According to the California Air Resources Board (CARB), among other pollutants, diesel trucks emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹ Studies conducted by the University of Southern California (USC) at communities in South Los Angeles show that traffic-related pollution is linked to early markers for cardiovascular disease in children.²

Cumulative Impact Analysis. Based on CJUSD’s review of CEQA documents prepared for industry projects, it appears that many of these projects on their own do not warrant mitigation for health risks caused by truck emissions. Notwithstanding the less-than-significant cumulative findings in CEQA documents, air quality in the region continues to worsen, and CJUSD is concerned that cumulative air quality analyses and health risk assessments are inadequate. They do not accurately characterize the existing/baseline degraded air quality conditions nor do they appropriately incorporate past, present, and reasonably foreseeable development projects in the cumulative analyses. The studies have not adequately evaluated cumulative health risks, disclosed each project’s incremental contribution to the cumulative degradation of air quality, or mitigated each project’s incremental cumulative impacts.

Another concern is that the City allows Applicants to retain their own environmental consultants. While City staff reviews the draft CEQA documents and the City occasionally retains planners to assist with third-party review, neither City staff nor the third-party planners are modeling experts. Assumptions used in the AQ, GHG, and HRA modeling may be incorrect, and project-level and cumulative impacts are not fully captured. Therefore, CJUSD requests that the City consider retaining a modeling specialist to review this Project’s and other industry application’s AQ, GHG, and HRA analyses. CJUSD also requests that the City consider creative ways to help reduce poor air quality at CJUSD schools, such as conditioning industry Applicants to contribute to CJUSD’s efforts to install and maintain hospital-grade HVAC systems at our schools in order to limit exposure of toxic air contaminants to children.

Warehouse Building Design Considerations. The nearest sensitive land uses—Joe Baca Middle School and residences—are 685 feet west of the Project site. Other nearby sensitive receptors, i.e., residential, are 1,150 feet to the north. According to the U.S. Environmental Protection Agency, the combined use of vegetation and sound walls has shown a reduction of vehicle pollution downwind of roadways by up to 60 percent.³ Additionally, the California Attorney General recommends that the design of logistics facilities consider physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are present.⁴ Therefore, the District requests that the Project incorporate vegetation and sound walls as project design

¹ California Environmental Protection Agency, California Air Resources Board. Nitrogen Dioxide & Health. Website Accessed: 2021, July 21. <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>

² University of Southern California. Traffic-Related Pollution Linked to Early Markers for Cardiovascular Disease in Children. 2021, April 29. <https://news.usc.edu/185647/auto-emissions-pollution-children-cardiovascular-disease-usc-research/>

³ Bowker, G. E., Baldauf, R., Isakov, V., Khyilstov, A., & Petersen, W. (2007). The effects of roadside structures on the transport and dispersion of ultrafine particles from highways. *Atmospheric Environment*, 41, 8128-8139, as cited in *Best Practices for Reducing Near-Road Pollution Exposure at Schools*. US EPA. November 2015.

⁴ California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>

features with the goal to reduce air and noise pollution. The barriers should not have gaps. For vegetative barriers, evergreen species with mature, dense greenery should be used.

The California Attorney General also recommends the following in the design of a logistics facility:⁵

- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.

The Project's proposed truck operations face sensitive receptors west of the site. Although Joe Baca Middle and residences west of South Lilac Avenue are not downwind, based on the AG's recommendations, the EIR should consider—as a Project alternative—placement of the proposed warehouse building on the western side of the property and truck operations on the eastern half. With the proposed 35-foot cube building blocking truck operations from sensitive uses west of South Lilac Avenue, it is possible that this alternative design would assist in the reduction potential air and noise pollution impacts.

Air Quality Analysis. The South Coast Air Quality Management District (South Coast AQMD) has identified the Bloomington, Fontana, Rialto community as an Assembly Bill 617 (AB 617) Year 2–5 community.⁶ AB 617 communities meet one or more of the following criteria: identified within the top 25 percent of CalEnviroScreen 3.0; identified within the top 25 percent of South Coast AQMD's Multiple Airborne Toxics Emissions Study (MATES) IV for cancer risk; and/or average percent of industrial land use and freeways within 1,000 feet from school/daycare boundaries was in the top 20 percent. Rialto meets not one but all three of these AB 617 criteria. Placement of the Project proximate to these disadvantaged communities would further exacerbate local air quality and associated health effects. Consequently, the environmental analysis prepared for the Project needs to consider not only project-related emissions, but also the project's emissions in context with existing, approved, and planned sources in Rialto and surrounding communities, including unincorporated Bloomington. Additionally, consistent with letters submitted by the California Attorney General's Office on CEQA projects, the EIR should consider whether use of the South Coast AQMD thresholds is appropriate or whether a more restrictive threshold (e.g., less than 10 in a million-cancer risk, such as 1 in a million) is appropriate when addressing air quality impacts in AB 617 / environmental justice communities.

Health Risk Analysis. Residents and schools proximate to the Project site already experience elevated levels of air pollutants associated with proximity to the Colton Rail Yard, Interstate-10 Freeway, and warehousing/industrial sources. The Project would incrementally increase health risks. The Project's air quality analysis should evaluate the cumulative health risks for affected residents in order to disclose the project's cumulative contribution to the health risks and decision makers can make findings regarding potential air quality impacts, and the Health Risk Assessment conducted for the Project should consider the impacts of truck traffic from the Project site to the freeway, as well as on-site yard equipment. Emissions from transport refrigeration units (TRUs) should also be included if cold storage is an option for

⁵ Ibid.

⁶ Community Recommendations for AB 617 Implementation. South Coast Air Quality Management District. <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/submittal-to-carb.pdf>

Project operations. If cold storage is not an option, the District requests the City to condition the Project to prohibit operation of TRUs.

Hazards/Hazardous Materials. Rialto has identified Valley Boulevard, Cedar Avenue, and Riverside Avenue as designated truck routes.⁷ It is possible that Project-related vehicles use the freeway on- and off-ramps at Cedar Avenue and Riverside Avenue during the Project's construction and operation phases. As the use of the Cedar Avenue freeway ramps would require trucks to pass by two schools: Baca Middle and Grimes Elementary, and since the Riverside Avenue freeway ramps are closer to the Project site, the District requests that the City require and condition the Applicant to use only the Riverside Avenue freeway ramps for both construction and operation phases. Accordingly, all analysis in the EIR, including the traffic impact analysis for the Project and project alternative (see above), will need to reflect trailer truck trips accessing the Riverside Avenue freeway ramps and mitigate significant impacts to acceptable standards.

Vehicle and Pedestrian Conflicts. Should the City not prohibit Project truck operations from using the freeway on/off ramps on Cedar Avenue and using the segment of Valley Boulevard west of the Project site, the District requests that the City consider mitigating potential pedestrian safety impacts at both schools by prohibiting the Project from operating its trucks 30 minutes before the morning drop-off time and 30 minutes before and after the pick-up time. Other mitigation could also include but not limited to on-going funding to support crossing guards near schools.

Conclusion. CJUSD appreciates the opportunity to submit these comments on the Project. The District has serious concerns about the volume of truck traffic, the related health effects on its students and staff, and the potential impacts on school operations. We look forward to reviewing the forthcoming EIR.

Sincerely,

Owen Chang
Facilities & Energy Management Director

Cc: Rick Jensen, Assistant Superintendent Business Services
File

⁷ City of Rialto General Plan. Exhibit 4.5 – Truck Routes.
<https://www.yourrialto.com/DocumentCenter/View/599/Truck-Routes-PDF>