Draft Environmental Impact Report
SCH No. 2022040038

Nevada & Palmetto Commerce Center
San Bernardino County, California

Lead Agency

San Bernardino County
385 N. Arrowhead Ave.
San Bernardino, CA 92415

January 2023

Draft Environmental Impact Report
SCH No. 2022040038

Nevada & Palmetto Commerce Center
San Bernardino County, California

Lead Agency
San Bernardino County
385 N. Arrowhead Ave.
San Bernardino, CA 92415

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

Project Applicant
LDC Industrial Realty, LLC

Lead Agency Discretionary Permits
PROJ-2022-00012
Conditional Use Permit
Lot Merger

January 2023

TABLE OF CONTENTS

Section Name and Number **Page**

Section Name and Number **Page**

Section Name and Number **Page**

Section Name and Number **Page**

Section Name and Number | Page

EIR Technical Appendices (bound separately)

LIST OF FIGURES

Figure Number and Title **Page**

LIST OF TABLES

Table Number and Title **Page**

Acronym	Definition

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
§	Section
AB 32	California Assembly Bill 32 – Global Warming Solutions Act of 2006
AB 52	Native Americans: California Environmental Quality Act
AB 1493	Pavley Fuel Efficiency Standards
ACHP	Advisory Council on Historic Preservation
AERMOD	Air Quality Dispersion Modeling
AFB	Norton Air Force Base
AMSL	Above Mean Sea Level
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
APS	Alternative Planning Strategy
APSA	Aboveground Petroleum Storage Act Program
APN	Assessor Parcel Number
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAU	Business as Usual
BMPs	Best Management Practices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFire	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CAL OES	Governor's Office of Emergency Services
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBSC	California Building Standards Code
CCR	California Code of Regulations
CCAA	California Clear Air Act

Acronym	Definition
CCCC	California Climate Change Center
CD	Consistency Determination
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFCs	Chlorofluorocarbons
C_2F_6	Hexaflouroethane
CF_4	Tetraflouromethane
CFGC	California Fish and Game Code
CFS	Cubic Feet per Second
CGC	California Government Code
CGS	California Geologic Survey
C_2H_6	Ethane
CH_4	Methane
CLCA	California Land Conservation Act
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COA	Conditions of Approval
COG	Council of Governments
COHb	carboxyhemoglobin
Connect SoCal	2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
COP	Conference of the Parties
Corps	U.S. Army Corps of Engineers
County	San Bernardino County
Countywide Plan	San Bernardino County General Plan
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utilities Commission
CSL	California Street Landfill
CSU	California State University
CTR	California Toxics Rule
CUP	Conditional Use Permit
CUPA	California Unified Program Agencies
CWA	Clean Water Act

Acronym	Definition
c.y.	Cubic Yards
D	Urban and Built-Up Land
dB	Decibel
dBA	A-weighted Decibels
DDT	dichlorodiphenyltrichloroethane
DMV	Department of Motor Vehicles
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EMFAC	Emission Factor Model
EO	Executive Order
EPA	Environmental Protection Agency
EPS	Emission Performance Standard
ESA	Endangered Species Act
ESA	Environmental Site Assessment
EVAP	East Valley Area Plan
EV/IR	Regional Industrial
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Association
G	Grazing Land
GBN	ground-based noise
GBV	ground-based vibration
GCC	Global Climate Change
Gg	Gigagrams
GHG	Greenhouse Gas
GHGA	GHG Analysis Report
GI	General Industrial
gpd	Gallons per Day
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GWP	Global Warming Potential

Acronym	Definition
H_2O	Water Vapor
HbA	Hanford sandy loam
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HDTs	Heavy duty trucks
HMBEP	Hazardous Materials Business Emergency Plan
HMIS	Hazardous Materials Inventory Statements
HMMP	Hazardous Materials Management Plan
HMTA	Hazardous Materials Transportation Act
HMTAUSA	Hazardous Materials Transportation Uniform Safety Act
HSC	Health and Safety Code
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
I	Interstate
IEPR	Integrated Energy Policy Report
in	inches
in/sec	inches per second
in/yr	inches per year
IPCC	Intergovernmental Panel on Climate Change
IRWMP	Integrated Regional Water Management Plan
ISO	Independent Service Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
kWh	kilowatt-hour
L	Farmland of Local Importance
LCA	Life-Cycle Analysis
LCC	Land Capability Classification
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard
L_{eq}	equivalent continuous sound level
LESA	Land Evaluation and Site Assessment
LM	Lot Merger
LOS	Level of Service
LRA	local responsibility area
LSTs	Localized Significance Thresholds
Lw	reference sound power level
MBTA	Migratory Bird Treaty Act
MEIR	maximally exposed individual receptor

Acronym	Definition
MEIW	maximally exposed individual worker
MJLHMP	Multi-Jurisdictional Local Hazard Mitigation Plan
MM	Mitigation Measure
MMT	million metric ton
MMTCO2e	million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MTCO2e	Metric Tons of Carbon Dioxide Equivalent
MVSL	Mid-Valley Sanitary Landfill
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NCCP	Natural Community Conservation Planning
NDC	Nationally Determined Contribution
NF_3	Nitrogen Trifluoride
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NMFS	National Marine Fisheries Service
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO_X	Nitrogen Oxides
N_2	Nitrogen
N_2O	Nitrous Oxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPPA	Native Plant Protection Act
NPS	National Park Service
NPS	non-point source
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTR	National Toxics Rule
O_3	Ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Assessment

Acronym	Definition
P	Prime Farmland
PA	Program Agencies
Pb	Lead
PCBs	Polychlorinated biphenyls
PFCs	Perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter (2.5 microns or smaller)
PM_{10}	Fine Particulate Matter (10 microns or smaller)
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Project	Nevada & Palmetto Commerce Center Project
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
ROGs	Reactive Organic Gasses
RSL	Regional Screening Level
RPS	Renewable Portfolio Standards
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Redlands Unified School District
RWQCB	Regional Water Quality Control Board
RWWTP	Redlands Wastewater Treatment Plant
S	Farmland of Statewide Importance
SARA	Superfund Amendments and Reauthorization Act
SAWPA	Santa Ana Watershed Project Authority
SB	Senate Bill
SB 32	California Senate Bill 32
SB 350	California Senate Bill 350, Clean Energy and Pollution Reduction Act of 2015
SB 375	California Senate Bill 375, Sustainable Communities and Climate Protection Act of 2008
SB 1078	California Senate Bill 1078, California Renewable Portfolio Standards
SB 1368	California Senate Bill 1368
SBTAM	San Bernardino Transportation Analysis Model
SCAB	South Coast Air Basin
SCAG	Sothern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)
SCS	Sustainable Communities Strategy

Acronym	Definition
SF_6	Sulfur Hexafluoride
s.f.	square-foot, square foot, square footage, or square feet
SGMA	Sustainable groundwater management act
SHA	Safe Harbor Agreement
SHMA	Seismic Hazards Mapping Act
SHPOs	State Historic Preservation Officers
SHRC	State Historical Resources Commission
SNUR	Significant New Use Rule
SO_2	Sulfur Dioxide
SO_4	Sulfates
SO_X	Sulfur Oxides
SoCal Gas	Southern California Gas Company
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TEA-21	Transportation Equality Act for 21st Century
TRUs	Transportation Refrigeration Units
TSCA	Toxic Substances Control Act
U	Unique Farmland
UBC	Uniform Building Code
UNFCCC	United Nations' Framework Convention on Climate Change
USCB	United States Census Bureau
USDA	U.S. Department of Agriculture
USFWS	United States Fish and Wildlife Service
VdB	vibration decibel notation
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
WDR	Waste Discharge Requirement
WMI	Watershed Management Initiative
WQMP	Water Quality Management Plan
WS	Waters of the State
WUS	Waters of the U.S.
WWTP	Wastewater Treatment Plant
X	Other Land

Acronym	Definition
YBP	Years before Present
YSMN	Yuhaaviatam of San Manuel Nation Cultural Resources Department
ZOI	Zone of Influence
ZORI	Zones of Required Investigation

S.0 EXECUTIVE SUMMARY

S.1 INTRODUCTION

The California Environmental Quality Act (CEQA) as codified in Public Resources Code Section 21000, *et seq.* requires that before a public agency makes a decision to approve a project that could have one or more adverse effects on the physical environment, the agency must inform itself about the project's potential environmental impacts, give the public an opportunity to comment on the environmental issues, and take feasible measures to avoid or reduce potential harm to the physical environment.

This Environmental Impact Report (EIR), having California State Clearinghouse (SCH) No. 2022040038, was prepared in accordance with CEQA Guidelines Article 9, Sections 15120-15132 to evaluate the potential environmental impacts associated with planning, constructing, and operating the proposed Nevada & Palmetto Commerce Center project (hereinafter, the "Project" or "proposed Project"). This EIR does not recommend approval or denial of the proposed Project; rather, this EIR is a source of factual information regarding potential environmental impacts that may result from implementation of the Project. The Draft EIR will be available for public review for a minimum period of 45 days. After consideration of public comment, San Bernardino County will consider certifying the Final EIR and adopting required findings.

San Bernardino County in its capacity as Lead Agency for the proposed Project has determined that the Project clearly has the potential to result in significant environmental effects and that an EIR shall be prepared that addresses the 12 environmental topic areas listed below in detail.

1. Agriculture & Forestry Resources
2. Air Quality
3. Biological Resources
4. Cultural Resources
5. Energy
6. Geology & Soils
7. Greenhouse Gas Emissions
8. Hazards & Hazardous Materials
9. Hydrology & Water Quality
10. Noise
11. Transportation
12. Tribal Cultural Resources

This EIR's scope was determined through the independent judgment of San Bernardino County pursuant to CEQA Guidelines Section 15063, and in consideration of public comment received by the County in response to this EIR's Notice of Preparation (NOP). The NOP and written comments received by the County in response to the NOP, are attached to this EIR as *Technical Appendix A*. As determined by the County and in consideration of public comment on the NOP, the 12 environmental subject areas listed above have reasonable potential to be significantly affected by planning, constructing, and/or operating the proposed Project and the potential effects resulting from the Project are analyzed herein.

Refer to EIR Section 4.0, *Environmental Analysis*, for a full account and analysis of the topic areas listed above. Topic areas for which the EIR concluded that impacts would clearly not be significant and that do not warrant detailed analysis in this EIR are addressed in EIR Section 5.0, *Other CEQA Considerations*. For each of the aforementioned subject areas, this EIR describes: 1) the physical conditions that existed at the approximate time this EIR's NOP was filed with the California State Clearinghouse (April 1, 2022);

2) discloses the type and magnitude of potential environmental impacts resulting from Project planning, construction, and operation; and 3) if warranted, recommends feasible mitigation measures that would reduce or avoid significant adverse environmental impacts that the proposed Project may cause.

A summary of the Project's significant environmental impacts and the mitigation measures imposed by San Bernardino County to lessen or avoid those impacts is included in this Executive Summary as Table S-1, *Mitigation Monitoring and Reporting Program*. The County applies mitigation measures that it determines 1) are feasible and practical for the Project Applicant to implement, 2) are feasible and practical for the County to monitor and enforce, 3) are legal for the County to impose, 4) have an essential nexus to the Project's impacts, and 4) would result in a benefit to the physical environment. CEQA does not require the Lead Agency to impose mitigation measures that are duplicative of mandatory regulatory requirements.

S.2 PROJECT OVERVIEW

S.2.1 LOCATION AND SETTING

The approximately 17.7-acre Project Site is located within the "Donut Hole" area of unincorporated San Bernardino County, adjacent to the City of Redlands. The "Donut Hole" area is surrounded on all sides by the City of Redlands. The Project Site abuts Nevada Street on the west and is located approximately 650 feet north of Palmetto Avenue. The Project Site includes Assessor Parcel Numbers (APNs) 0292-041-08 and -44 in unincorporated San Bernardino County and APN 0292-041-38 in the City of Redlands. The Project Site is located within Section 23, Township 12 North, Range 3 West, San Bernardino Baseline and Meridian.

S.2.2 PROJECT SUMMARY

For purposes of this EIR, the term "Project" refers to the actions required to implement the proposed Nevada & Palmetto Commerce Center project, including planning construction, and ongoing operation. The Project includes the construction and operation of a 380,579 square foot (s.f.) distribution center building and associated facilities including but not limited to a loading/unloading area with loading dock doors and trailer parking spaces, passenger vehicle parking, landscaping, and connections to existing utility infrastructure. The Project requires the County's approval of a Conditional Use Permit and Lot Merger. Refer to EIR Section 3.0, *Project Description*, for a detailed description of the Project.

S.2.3 PROJECT OBJECTIVES

The Project seeks to develop a distribution center building on an approximately 17.7-acre property, in conformance with the land use designation applied to the subject property by the Countywide Plan and the East Valley Area Plan. The Project would achieve this goal through the following objectives.

1. To expand economic development in San Bernardino by developing an underutilized property with an in-demand industrial use within an area that is planned for long-term industrial development.
2. To make efficient use of a property by maximizing its buildout potential for employment-generating uses.

3. To attract employment-generating businesses to San Bernardino County to reduce the need for members of the local workforce to commute outside the area for employment.
4. To develop an industrial building in close proximity to the California highway system that can be used as part of the southern California supply chain and goods movement network.
5. To develop an industrial building on a property with no adjacent sensitive receptors and with operational characteristics that are compatible with other existing and planned land uses in the immediate vicinity of the Project Site.
6. To develop a property that has access to available infrastructure, including roads and utilities.

S.3 EIR PROCESS

Following preliminary review of the Project's application materials, San Bernardino County concluded that the Project and its associated implementing actions have the *potential* to result in significant environmental effects; as such, the County proceeded with preparation of this EIR pursuant to CEQA Guidelines Section 15060(d). The County filed a NOP with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared. The NOP were distributed for a 30-day public review period, which began on April 1, 2022. The County received written comments on the scope of the EIR during those 30 days, which were considered by the County during the preparation of this EIR.

This EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day review period. During the 45-day public review period, public notices announcing availability of the Draft EIR will be mailed to interested parties, and copies of the Draft EIR and its Technical Appendices will be available for review at the locations indicated in the public notices.

After the close of the 45-day Draft EIR public comment period, the County will prepare and publish responses to written comments it received on the environmental effects of the Project. The Final EIR will be considered for certification by the San Bernardino Planning Commission. Certification of the Final EIR would be accompanied by the adoption of written findings and a statement of overriding considerations for any significant unavoidable environmental impacts identified in the Final EIR. In addition, pursuant to Public Resources Code Section 21081.6 and because the Project will include mitigation measures, the County must adopt a Mitigation, Monitoring, and Reporting Program (MMRP), which describes the process to ensure the Project's construction and operational activities will comply with the mitigation measures identified in the Final EIR.

S.4 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(2) requires the Lead Agency (San Bernardino County) to identify any known issues of controversy in the Executive Summary.

The County has not identified any environmental issues of controversy associated with the Project. Notwithstanding, as part of the NOP public comment period the Lead Agency has identified several issues of local concern including, but not limited to, potential impacts related to air pollution (including toxic air

contaminants and greenhouse gas emissions), biological resources, and tribal cultural resources – and these issues are all addressed in this EIR. Considering the foregoing, this EIR addresses all environmental issues that are known by the County and that were identified in the comment letters that the County received in response to the NOP. Written comments received by the County in response to the NOP are summarized in Section 1.0 of this EIR (refer to Table 1-1, *Summary of NOP Comments*).

S.5 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires that an EIR describe a range of reasonable alternatives to the Project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. As demonstrated in Section 4.0 of this EIR, implementation of the Project would not result in significant adverse environmental effects that cannot be mitigated to below a level of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures; thus, there is no need for the County to consider adoption of alternative development scenarios to the Project. Notwithstanding, the EIR does address the following alternatives:

S.5.1 ALTERNATIVE DEVELOPMENT SITE

This alternative considers developing the Project at another location. An alternative development site was considered by the County but rejected from detailed analysis because no other properties that would be reasonably available to the Project Applicant are: 1) are large enough to support the proposed Project, 2) have fewer environmental constraints than the Project Site, and 3) have fewer developmental constraints than the Project Site (e.g., distance from sensitive receptors, access to existing roadways and the State highway system, public utilities and infrastructure).

S.5.2 NO PROJECT ALTERNATIVE

The No Project Alternative considers a scenario where the Project does not proceed and the Project Site remains vacant and undeveloped for the foreseeable future. Implementation of the No Project Alternative would result in no physical environmental impacts to the Project Site beyond those that have historically occurred on the Project Site. All potentially significant effects of the Project would be avoided by the selection of this Alternative. Because the No Project Alternative would not re-develop the Project Site and would not promote local economic development, including through the creation of new jobs and the expansion of the local tax base, the No Project Alternative would fail to meet all of the Project's objectives.

S.5.3 REDUCED BUILDING AREA ALTERNATIVE

The Reduced Building Area Alternative considers a proposal where the Project Site would be developed with two separate uses: a warehouse distribution building and an outdoor industrial storage area (used for parking tractor trucks and trailers). Under the Reduced Building Area Alternative, approximately 12 acres on the western portion of the Project Site would be developed with an approximately 261,360 s.f., 50-foot-tall warehouse distribution building, including related site improvements such as truck loading/unloading areas and parking, passenger vehicle parking, landscaping, signage, and public utility connections. This alternative also provides for approximately five acres on the eastern portion of the Project Site to be developed with a paved outdoor storage area that would be used for heavy truck (tractor) and/or truck trailer parking. This

Alternative was selected by the Lead Agency to evaluate a scenario that would reduce the total building area on the Project Site relative to the Project but still allow productive industrial use of the entire Site.

The Reduced Building Area Alternative would incrementally reduce the Project's less than significant effects to air quality, energy, and greenhouse gas emissions. The Reduced Building Area Alternative would result in less than significant effects that are similar to the Project under the topics of agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation, and tribal cultural resources.

The Reduced Building Area Alternative would fail to meet Project Objective #2 and would be less effective than the Project at achieving Project Objective #3 because this alternative would result in a substantial reduction in the development of an in-demand, employment generating land use on the Project Site. The Reduced Building Area Alternative would meet all other Project Objectives.

S.6 Summary of Impacts, Mitigation Measures, and Conclusions

Table S-1 provides a summary of the Project's environmental impacts, as required by CEQA Guidelines Section 15123(a). Also presented are the mitigation measures recommended by the Lead Agency to further avoid adverse environmental impacts or to reduce their level of significance. After the application of all feasible mitigation measures, the Project would not result in any significant and unavoidable environmental effects.

Table S-1 Mitigation Monitoring and Reporting Program

Threshold	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
Agriculture & Forestry Resources					
Summary of Impacts					
Threshold "a:" Less Than Significant Impact. The Project Site contains lands designated as "Prime Farmland" by the FMMP, but the Site is not considered to be an important agricultural resource under the California LESA Model and is not under agricultural production under existing conditions.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" No Impact. The Project Site is not zoned for an agricultural use and is not subject to a Williamson Act contract; therefore, implementation of the Project would not conflict with an agricultural use.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "c:" No Impact. The Project Site is not zoned for forest land; therefore, implementation of the Project would not conflict with any zoning for forest land resources.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "d:" No Impact. There are no forest lands, timberland, or Timberland Production-zoned land on the Project Site; therefore, implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "e:" Less-then-Significant Impact. Implementation of the Project would not involve changes to the environment that could result in conversion of off-site Farmland to non-agricultural use or conversion of forest land to non-forest use.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Air Quality					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. The Project would neither contribute to a delay in the attainment of federal and State air quality standards in the SCAB nor exceed local growth projections. Accordingly, the Project would not conflict with or obstruct implementation of the 2016 AQMP.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" Less than Significant Impact. Project construction and operational activities would not exceed the applicable SCAQMD regional threshold for any criteria pollutant. Thus, the Project would not contribute to cumulatively considerable levels of any air pollutant for which the SCAB does not attain federal or State air quality standards.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "c:" Less than Significant Impact. Implementation of the Project would not: 1) exceed applicable SCAQMD localized criteria pollution emissions thresholds during construction and operation; 2) would not expose sensitive receptors to toxic air contaminants that exceed the applicable SCAQMD carcinogenic and non-carcinogenic risk thresholds; and 3) would not cause or contribute to the formation of a CO "hot spot."	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "d:" Less than Significant Impact. The Project would not produce air emissions that would lead to unusual or substantial construction-related or operational-related odors. The Project is required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Biological Resources					
Summary of Impacts					
Threshold "a:" Potential Significant Direct and Cumulatively Considerable Impact. The Project Site contains suitable habitat for the burrowing owl. In the event the burrowing owl is present on the Project Site at the time construction commences, implementation of the Project has the potential to result in the mortality of burrowing owl individuals.	**MM 4.3-1** Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by San Bernardino County prior to the issuance of a grading permit and subject to the following provisions: a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction. b) In the event that the pre-construction survey identifies the presence of the burrowing owl on the Project Site, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.	Project Applicant / Developer, Project Biologist	San Bernardino County Planning Division	Prior to grading	Less than Significant Impact with Mitigation

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Threshold "b:" No Impact. The Project Site does not contain riparian and/or other sensitive natural habitats; therefore, the Project would have no impact on riparian or other sensitive habitats as classified by the CDFW or USFWS.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "c:" No Impact. No State- or federally-protected wetlands are located on the Project Site; therefore, no impact to wetlands would occur.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold d: Potential Significant Direct and Cumulatively Considerable Impact. There is no potential for the Project to interfere with the movement of fish or impede the use of a native wildlife nursery site. However, the Project has the potential to impact nesting migratory birds protected by the MBTA and California Fish and Game Code, should habitat removal occur during the nesting season and should nesting birds be present.	**MM 4.3-2** Vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (January 31 through September 1), unless a migratory bird nesting survey is completed in accordance with the following requirements: a) A nesting bird survey shall be conducted on the Project Site and within suitable habitat located within a 500-foot radius of the Project Site by a qualified biologist within three days prior to initiating vegetation clearing or ground disturbance. b) If the survey identifies the presence of active nests, then the nests shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (i) the adult birds have not begun egg-laying and incubation; or (ii) the juveniles from the occupied nests are capable of independent survival. c) If the biologist is not able to verify any of the conditions from sub-item "b," above, then no disturbance shall occur within a buffer zone specified by the qualified biologist for each nest or nesting site. The buffer zone shall be species-appropriate (no less than 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors) and shall	Project Applicant/Developer, Project Biologist	San Bernardino County Planning Division	Prior to construction	Less than Significant Impact with Mitigation

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	be sufficient to protect the nest from direct and indirect impacts from construction activities. The size and location of buffer zones, if required, shall be based on consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service and shall be subject to review and approval by San Bernardino County. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist, with County concurrence, verifies that the nests are no longer occupied and/or juvenile birds can survive independently from the nests.				
Threshold "e:" No Impact. The Project would not conflict with any local policies or ordinances protecting biological resources.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "f:" No Impact. The Project impact area is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur.	No mitigation is required.	N/A	N/A	N/A	No Impact
Cultural Resources					
Summary of Impacts					
Thresholds "a" & "b:" Potentially Significant Direct and Cumulatively Considerable Impact. No known historic resources are present on the Project Site and the likelihood of uncovering buried historic resources on the Project Site is low due to the magnitude of previous ground disturbances on the Project Site. Nonetheless, the potential exists for Project-related	**MM 4.4-1** Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to San Bernardino County that an archaeologist that meets the latest version of the Secretary of the Interior Professional Qualifications Standards (hereafter "Project Archaeologist") has been retained to conduct the training and monitoring activities described in Mitigation Measure 4.4-2 and Mitigation Measure 4.4-3.	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division	Prior to issuance of grading permit	Less than Significant Impact with Mitigation

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
construction activities to result in a potentially direct and cumulatively-considerable impact to significant buried/masked historic resources should such resources be discovered during Project-related construction activities. No known prehistoric resources are present on the Project Site and the likelihood of uncovering buried prehistoric resources on the Project Site is low due to the magnitude of historic ground disturbance on the Project Site. Nonetheless, the potential exists for Project-related construction activities to result in a potentially direct and cumulatively-considerable impact to significant subsurface prehistoric archaeological resources should such resources be discovered during Project-related construction activities.	**MM 4.4-2** Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to San Bernardino County that the construction site supervisors and crew members involved with grading and trenching operations have received training by the Project Archaeologist to recognize archaeological resources (historic and prehistoric) should such resources be unearthed during ground-disturbing construction activities. The training will include a brief review of the cultural sensitivity of the area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of archaeological resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new supervisorial construction personnel involved with grading and trenching operations that begin work on the Project Site after the initial training session must take the training prior to beginning work on-site.	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division	Prior to issuance of grading permit	
	MM 4.4-3 The Project Archaeologist shall conduct monitoring during all grading, trenching, and excavation activities. The Project Archaeologist shall be equipped to salvage artifacts if they are unearthed to avoid construction delays. Should the Project Archaeologist determine during construction activities that there are no archaeological resources within the Project's disturbance area or should the archaeological sensitivity be reduced to low, archaeological monitoring activities can be reduced to spot-checking or may be allowed to cease.	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division	Ongoing during grading, trenching, and excavation activities	

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	MM 4.4-4 In the event that suspected cultural resources are discovered during Project construction activities: a. All work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the other portions of the Project Site outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. b. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to San Bernardino County and the YSMN for review and comment. The Project Archaeologist shall monitor the remainder of ground-disturbing Project construction activities and implement the Plan accordingly. c. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5 and that code enforced for the duration of the project.	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division		

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	d. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered resource(s) shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the YSMN or appropriate Native American Tribe(s) if that is recommended by San Bernardino County. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to San Bernardino County, the South Central Coastal Information Center at California State University, Fullerton, and the YSMN or appropriate Native American Tribe(s).				
Threshold "c:" Less than Significant Impact. In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, the applicable provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 et seq. would be followed. Mandatory compliance with State law would ensure that any discovered human remains are appropriately treated and would preclude the potential for significant impacts.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Energy					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. The amount of energy and fuel consumed by construction and operation of the Project would not be inefficient, wasteful, or unnecessary. Furthermore, the Project would not cause or result in the need for	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
additional energy facilities or energy delivery systems.					
Threshold "b:" Less than Significant Impact. The Project would not conflict with or obstruct the achievement of energy conservation goals within the State of California identified in State and local plans for renewable energy and energy efficiency.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Geology & Soils					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. Implementation of the Project would not expose people or structures to substantial direct or indirect adverse effects related to liquefaction or fault rupture. The Project Site is subject to seismic ground shaking associated with earthquakes; however, mandatory compliance with local and State regulatory requirements and building codes would ensure that the Project minimizes potential hazards related to seismic ground shaking to less than significant levels.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" Less than Significant Impact. Implementation of the Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities and adhere to a Storm Water Pollution Prevention Plan (SWPPP), and prepare an erosion control plan to minimize water and wind erosion. Following completion of development, the Project's owner or operator would be required by law to implement a Water Quality Management Plan (WQMP) during operation, which would preclude substantial erosion impacts in the long-term	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Threshold "c:" Less than Significant Impact. There is no potential for the Project's construction or operation to cause, or be impacted by, on- or off-site landslides or lateral spreading. Potential hazards associated with unstable soils would be precluded through mandatory adherence to the recommendations contained in an approved geotechnical report.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "d:" No Impact. The Project Site contains soils with no susceptibility to expansion; therefore, the Project would not create substantial direct or indirect risks to life or property associated with the presence of expansive soils. No impact would occur.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "e:" No Impact. No septic tanks or alternative wastewater disposal systems are proposed to be installed on the Project Site. Accordingly, no impact would occur associated with soil compatibility for wastewater disposal systems.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "f:" No Impact. The Project would not impact any known paleontological resource or unique geological feature. The Project Site is underlain by Holocene alluvium soils that are too young to contain important paleontological resources.	No mitigation is required.	N/A	N/A	N/A	No Impact
Greenhouse Gas Emissions					
Summary of Impacts					
Threshold "a:" Cumulatively Considerable Impact. The Project would exceed the County's significance threshold of 3,000 $MTCO_2e$ per year. As such, the Project would generate substantial, cumulatively-considerable GHG emissions that may have a significant impact on the environment.	**MM 4.7-1** Prior to the issuance of a building permit, the Project Applicant shall provide documentation to San Bernardino County Land Use Services Department (Planning Division) demonstrating that the design measures listed below have been incorporated into the Project design or that alternative design measures are proposed that would ensure the Project can achieve a minimum of 100 points from Table 2, Screening Table for	Project Applicant / Developer	San Bernardino County Planning Division	Prior to issuance of building permit	Less than Significant Impact with Mitigation

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	Implementing GHG Performance Standards for Commercial Development and Public Facilities, of the County of San Bernardino Greenhouse Gas Reduction Plan (September 2021). • Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38); • Greatly Enhanced Window Insulation (0.32 or less U-factor, 0.25 or less SHGC); • Enhanced Duct Insultation (R-8); • High Efficiency HVAC (SEER 15/80% AFUE or 8.5 HSPF); • High Efficiency Water Heater (0.72 Energy Factor); • All rooms within building have daylight (through use of windows, solar tubes, skylights, etc.); • All rooms daylighted; • Very High Efficiency Lights (100% of in-unit fixtures are high efficiency); • North/south alignment of building or other building placement such that the orientation of the buildings optimizes conditions for natural heating, cooling, and lighting; • Only California Native landscape that requires no or only supplemental irrigation; • Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water use); • Water Efficient Toilets/Urinals (1.5 gpm); • Waterless Urinals; • Water Efficient faucets (1.28 gpm); • Graywater (purple pipe) irrigation system on site; • Provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles;				

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	• Level 2 240 volt AC Fast Chargers (5 total); and • Recycle construction waste.				
Threshold "b:" Less than Significant Impact. The Project would be consistent with or otherwise would not conflict with, applicable regulations, policies, plans, and policy goals that would further reduce GHG emissions.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Hazards and Hazardous Materials					
Summary of Impacts					
Thresholds "a" & "b:" Less than Significant Impact. During Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the Project would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "c:" No Impact. The Project Site is not located within one-quarter mile of any existing or proposed school. Accordingly, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "d:" No Impact. The Project Site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "e:" Less than Significant Impact. The Project would be compatible with the nearby San Bernardino International Airport. As such, the Project would not result in an airport safety hazard for people residing or working in the Project area.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
Threshold "f:" Less than Significant Impact. The Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, adequate emergency vehicle access is required to be provided. Implementation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "g:" No Impact. The Project Site is not located in close proximity to wildlands or areas with high fire hazards. Thus, the Project would not expose people or structures to a significant wildfire risk.	No mitigation is required.	N/A	N/A	N/A	No Impact
Hydrology and Water Quality					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Adherence to a SWPPP and WQMP is required as part of the Project's implementation to address construction- and operational-related water quality.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" Less than Significant Impact. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the Basin.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "c:" Less than Significant Impact. The Project would be required to comply with applicable water quality regulatory requirements to minimize erosion and	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

Threshold	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
siltation. Additionally, the Project would not result in flooding on- or off-site or impede/redirect flood flows. Lastly, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.					
Threshold "d:" No Impact. The Project Site would not be subject to inundation from tsunamis, seiches, or other hazards.	No mitigation is required.	N/A	N/A	N/A	No Impact
Threshold "e:" Less than Significant Impact. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Noise					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. The Project would generate short-term construction and long-term operational noise but would not generate noise levels that exceed the standards established by standards established by San Bernardino County.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" Less than Significant Impact. The Project's construction and operational activities would not result in a perceptible groundborne vibration or noise.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "c:" Less than Significant Impact. The proposed Project would be compatible with noise levels from the San Bernardino International Airport and operation of the Project would not expose future employees on the Project Site to excessive noise levels.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact

Table S-1 Mitigation Monitoring and Reporting Program

Threshold	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
Transportation					
Summary of Impacts					
Threshold "a:" Less than Significant Impact. The Project would not conflict with an applicable program, plan, ordinance or policy addressing the circulation system.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "b:" Less than Significant Impact. The VMT generated by the Project would not exceed the County VMT significance thresholds for direct or cumulative impacts.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "c:" Less than Significant Impact. The Project would not introduce any significant transportation safety hazards due to a design feature or incompatible use.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Threshold "d:" Less than Significant Impact. Adequate emergency access would be provided to the Project Site during construction and long-term operation. The Project would not result in inadequate emergency access to the Site or surrounding properties.	No mitigation is required.	N/A	N/A	N/A	Less than Significant Impact
Tribal and Cultural Resources					
Summary of Impacts					
Threshold "a:" Significant Direct and Cumulatively Considerable Impact. The Project Site does not contain any recorded, significant tribal cultural resource sites; therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources. Nonetheless, Project construction activities have the potential to unearth and adversely impact tribal cultural resources that may be buried at the Project Site.	**MM 4.12-1** The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during Project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the Project Archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division	Ongoing during construction	Less than Significant Impact with Mitigation

Table S-1 Mitigation Monitoring and Reporting Program

THRESHOLD	MITIGATION MEASURE (MM)	RESPONSIBLE PARTY	MONITORING PARTY	IMPLEMENTATION STAGE	LEVEL OF SIGNIFICANCE
	represents YSMN for the remainder of ground disturbing construction activities for the Project (e.g., grading, excavation, trenching), should YSMN elect to place a monitor on-site.				
	MM 4.12-2 Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the Project.	Project Applicant / Developer, Project Archaeologist	San Bernardino County Planning Division	On going during construction	

1.0 INTRODUCTION

This Environmental Impact Report (EIR) is an informational document that represents the independent judgment of the San Bernardino County (hereinafter, "County"), acting as the Lead Agency pursuant to the California Environmental Quality Act (CEQA), and evaluates the physical environmental effects that could result from constructing and operating the proposed Nevada & Palmetto Commerce Center Project (hereinafter, the "Project"). To implement the Project, the Project Applicant has requested the County's approval of a Conditional Use Permit and a Lot Merger, collectively referred to as case "PROJ-2022-00012." Other related discretionary and administrative actions that may be required to construct and operate the Project also are described in this EIR.

When the term "Project" is used in this EIR, the term shall mean all aspects of the planning, construction, and operation of the proposed Project, including all discretionary and administrative approvals and permits required for its implementation. When the terms "Project Applicant" or "Applicant" are used, the terms shall mean LDC Industrial Realty, which is the entity that submitted applications for the Project as proposed and evaluated in this EIR.

1.1 PURPOSES OF CEQA AND THIS EIR

As stated by CEQA Guidelines Section 15002(a), the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed development activities involving discretionary government approvals (including the approval of private development projects);
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why the governmental agency approved the project in the manner the agency chose (if the project involves significant environmental effects).

Following a preliminary review of the Project's application materials, the County concluded that the Project and its associated implementing actions clearly have the *potential* to result in significant environmental effects; as such, the County proceeded with preparation of this EIR pursuant to CEQA Guidelines Section 15060(d). The County determined that a Project EIR, as described in CEQA Guidelines Section 15161, would be required. Pursuant to CEQA Guidelines Section 15161, this Project EIR shall "…focus primarily on the changes in the environment that would result from the development project," and "…examine all phases of the project including planning, construction, and operation." Also, pursuant to CEQA Guidelines Section 15121(a), the purposes of this EIR are to: (1) disclose information by informing public agency decision makers and the public generally of the significant environmental effects associated with all phases of the Project, (2) identify possible ways to minimize or avoid those significant effects, and (3) to describe a

reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen its significant environmental effects.

1.2 List of Project Approvals

The Project Applicant has filed applications for the following discretionary actions, which are under consideration by the County:

- A **Conditional Use Permit** that provides a development plan for a 380,579 square foot (s.f.) distribution center building on an approximately 17.7-acre property (hereinafter the "Project Site") located north of Palmetto Avenue and east of Nevada Street. The Conditional Use Permit includes a site plan, floor plan, architectural design and building elevations, cross-sections, trash enclosure details, wall elevations, conceptual grading plan, utilities plan, and a conceptual landscape plan, all of which provide the specific details related to development of the Project.

- A **Lot Merger** that reconfigures two of the existing parcels within the Project Site (Assessor Parcel Numbers 0292-041-08 and -44) into one parcel. As part of the proposed Lot Merger, additional public right-of-way for Nevada Street would be dedicated to the San Bernardino County while existing public utility easements abutting Nevada Street would be protected.

All components of the Project are described in detail in EIR Section 3.0, *Project Description*.

1.3 Prior CEQA Review

The Project Site is located within unincorporated San Bernardino County and is covered by the County's General Plan ("Countywide Plan"), which provides the fundamental basis for the County's land use and development policies. The Countywide Plan was the subject of review under CEQA (State Clearinghouse [SCH] Number 2017101033). The County approved the Countywide Plan and certified its Final Program EIR on October 27, 2020. The Program EIR contains information relevant to the Project Site. Thus, the Program EIR for the Countywide Plan is herein incorporated by reference pursuant to CEQA Guidelines Section 15150 and is available for public review at the Countywide Plan website (https://countywideplan.com/) and the San Bernardino County Planning Division, 385 N. Arrowhead Ave., San Bernardino, CA 92415.

1.4 Legal Authority

This EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 *et seq.*).

Pursuant to Public Resources Code Section 21067 and CEQA Guidelines Article 4 and Section 15367, the County is the Lead Agency under whose authority this EIR has been prepared. "Lead Agency" refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action to approve the Project, the County has the obligation to: (1) ensure that this

EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision making process; (3) make a statement that this EIR reflects the County's independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the Project that outweigh its unavoidable adverse effects (CEQA Guidelines Section 15090 through 15093).

Pursuant to CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City of Fontana will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Deny approval of the Project in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project could cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that: 1) there is no feasible way to lessen the effect or avoid the significant effect; and 2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

This EIR fulfills the CEQA environmental review requirements for the proposed Conditional Use Permit and Lot Merger, as well as all other governmental discretionary and administrative actions related to the Project.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

Public Resources Code Section 21104 requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines Sections 15082 and 15086(a)). As defined by CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency that have discretionary approval power over the project." A "Trustee Agency" is defined in CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

- Santa Ana Regional Water Quality Control Board (RWQCB) is identified as a Trustee Agency for the Project because it is responsible for the protection of California's water resources and water quality. The Santa Ana RWQCB is responsible for issuance of a National Pollutant Discharge Elimination System (NPDES) Permit to ensure that during and after Project construction, on-site water flows do not result in siltation, other erosional actions, or degradation of surface or subsurface water quality.

- California Department of Fish and Wildlife (CDFW) is a Trustee Agency for the Project because it is responsible for the protection of the State's fish, wildlife, and plant resources, and the habitats upon which they depend.

There are no other known Trustee Agencies or Responsible Agencies identified for the Project. Regardless, this EIR can be used by any Trustee Agency or Responsible Agency, whether identified in this EIR or not, as part of their decision-making processes in relation to the Project.

1.6 EIR SCOPE, FORMAT, AND CONTENT

1.6.1 EIR SCOPE

The County filed a Notice of Preparation (NOP) with the California Office of Planning and Research (State Clearinghouse) to indicate that an EIR would be prepared to evaluate the Project's potential to impact the environment. The NOP was filed with the State Clearinghouse and distributed to potential Responsible Agencies, Trustee Agencies, and other interested parties on April 1, 2022, for a 30-day public review period. The NOP was distributed for public review to solicit responses that would help the County identify the full scope and range of potential environmental concerns associated with the Project so that these issues could be fully examined in this EIR.

The NOP, public review distribution list, and written comments received by the County during the NOP public review period are provided in *Technical Appendix A* to this EIR. Substantive issues raised in response to the NOP are summarized below in Table 1-1, *Summary of NOP Comments*. The purpose of this table is to present a summary of the environmental topics that were expressed by public agencies, interested parties, and members of the general public to be of primary interest. Table 1-1 is not intended to list every comment received by the County during the NOP review period. Regardless of whether or not an environmental or CEQA-related comment is listed in the table, all relevant comments received in response to the NOP and during the EIR Scoping Meeting are addressed in this EIR.

Table 1-1 Summary of NOP Comments

Environmental Topic	Comment	Location(s) in EIR Where Comment Is Addressed
Air Quality	- Request that the health risk impacts related to the Project's operation be quantified and disclosed in the EIR.	Subsection 4.2, *Air Quality*
Biological Resources	- Request that the Project's potential impacts to sensitive species and their habitat be thoroughly addressed in the EIR.	Subsection 4.3, *Biological Resources*
Tribal Cultural Resources	- Recommendation for early consultation with the California Native American Tribes affiliated with the Project area.	Subsection 4.12, *Tribal Cultural Resources*
	- Recommendation to consult legal counsel to ensure compliance with AB 52.	

Upon consideration of the Project's proposal, its geographic location, and all comments received by the County in response to the NOP, this EIR provides a detailed analysis of the Project's potential to cause adverse effects under the following topics:

- Agriculture & Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Noise
- Transportation
- Tribal Cultural Resources

The topics listed above are evaluated in EIR Section 4.0, *Environmental Analysis*.

During the course of conducting research of the Project's potential environmental effects and preparing this EIR, the County concluded that the Project would clearly result in either (1) no impacts or (2) less-than-significant impacts under several environmental topic areas, including: aesthetics, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire. Potential effects to these topic areas are summarized in EIR Section 5.0, *Other CEQA Considerations*.

1.6.2 EIR Format and Content

This EIR contains all of the information required to be included in an EIR as specified by the CEQA Statute and Guidelines (California Public Resources Code, Section 21000 *et. seq.* and California Code of Regulations, Title 14, Chapter 5). CEQA requires that an EIR contain, at a minimum, certain specified content. Table 1-2, *Location of CEQA Required Topics*, provides a quick reference guide for locating the CEQA-required sections within this document.

In summary, the content and format of this EIR is as follows:

- **Section S.0, Executive Summary** provides an overview of the EIR and CEQA process and provides a brief description of the Project, including its objectives, the location and regional setting of the Project Site, and potential alternatives to the Project as required by CEQA. The Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the Project's MMRP.

- **Section 1.0, Introduction** provides introductory information about the CEQA process and the responsibilities of the County in its role as Lead Agency, a brief description of the Project, the purpose of the EIR, and an overview of the EIR format.

- **Section 2.0, Environmental Setting** describes the environmental setting, including descriptions of the Project Site's physical conditions and surrounding context used as the baseline for analysis in this EIR.

Table 1-2 Location of CEQA Required Topics

CEQA Required Topic	CEQA Guidelines Reference	Location in this EIR
Table of Contents	Section 15122	Table of Contents
Summary	Section 15123	Section S.0
Project Description	Section 15124	Section 3.0
Environmental Setting	Section 15125	Section 2.0
Consideration and Discussion of Environmental Impacts	Section 15126	Section 4.0
Significant Environmental Effects Which Cannot be Avoided if the Project is Implemented	Section 15126.2(c)	Section 4.0 & Subsection 5.1
Significant Irreversible Environmental Changes Which Would be Caused by the Project Should it be Implemented	Section 15126.2(d)	Subsection 5.2
Growth-Inducing Impact of the Project	Section 15126.2(e)	Subsection 5.3
Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects	Section 15126.4	Section 4.0 & Table S-1
Consideration and Discussion of Alternatives to the Project	Section 15126.6	Section 6.0
Effects Not Found to be Significant	Section 15128	Subsection 5.4
Organizations and Persons Consulted	Section 15129	Section 7.0 & Technical Appendices
Discussion of Cumulative Impacts	Section 15130	Section 4.0
Energy Conservation	Section 15126.2(b) & Appendix F	Subsection 4.5

- **Section 3.0, Project Description** includes a detailed Project Description that identifies the precise location and boundaries of the Project, a map showing the Project's location in a regional perspective, a statement of the Project's objectives, a general description of the Project's technical, economic, and environmental characteristics, and a statement describing the intended uses of the EIR, including a list of agencies expected to use the EIR, and a list of approvals for which the EIR will be used. The Project Description contains a level of specificity commensurate with the level of detail proposed by the Project.

- **Section 4.0, Environmental Analysis** provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the Project. A determination concerning the significance of each impact is addressed and mitigation measures are presented when warranted. The environmental changes identified in Section 4.0 and throughout this EIR are referred to as "effects" or "impacts" interchangeably. CEQA Guidelines Section 15358 describe the terms "effects" and "impacts" as being synonymous.

  In each subsection of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly as a result of the Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in CEQA Guidelines Section 15355 as "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

  The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information also is drawn from other sources of analytical materials that directly or indirectly relate to the Project and are cited in Section 7.0, *References*.

  Where the analysis identifies a significant environmental effect, feasible mitigation measures are recommended. Pursuant to CEQA and the CEQA Guidelines, an EIR must propose and describe mitigation measures to minimize the significant environmental effects identified in the EIR. The requirement that EIRs identify mitigation measures realizes CEQA's policy that Lead Agencies adopt feasible measures when approving a project to reduce or avoid its significant environmental effects. Per Public Resources Code Section 21081.6 and CEQA Guidelines Section 15126.4, mitigation measures must be enforceable through conditions of approval, contracts or other means that are legally binding. Pursuant to Public Resources Code Section 21081.6, incorporating mitigation measures into conditions of approval is sufficient to demonstrate that the measures are enforceable. This requirement is designed to ensure that mitigation measures will actually be implemented, not merely adopted and then ignored. In light of the foregoing, the identified mitigation measures are analyzed to determine whether they would effectively reduce or avoid any significant environmental effects. In most cases, implementation of the mitigation measures would reduce an identified significant environmental effect to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations would need to be adopted by the Lead Agency pursuant to CEQA Guidelines Section 15093.

- **Section 5.0, Other CEQA Considerations** includes specific topics that are required by CEQA. These include a summary of the Project's significant and unavoidable environmental effects, a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented, as well as potential growth-inducing impacts of the Project. Section 5.0 also includes a

discussion of the potential environmental effects that were found not be significant during preparation of this EIR.

- **Section 6.0, Project Alternatives** describes and evaluates alternatives to the Project that could reduce or avoid the Project's adverse environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives, including a "No Project" alternative, that will foster informed decision making and public participation.

- **Section 7.0, References** cites all reference sources used in preparing this EIR and lists the agencies and persons that were consulted in preparing this EIR. Section 7.0 also lists the persons who authored or participated in preparing this EIR.

1.6.3 Incorporation by Reference

CEQA Guidelines Section 15147 states that the "information contained in an EIR shall include summarized…information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public," and that the "[p]lacement of highly technical and specialized analysis and data in the body of an EIR shall be avoided through the inclusion of supporting information and analyses as appendices to the main body of the EIR." CEQA Guidelines Section 15150 allows for the incorporation "by reference all or portions of another document… [and is] most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand." The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this EIR. Where this EIR incorporates a document by reference, the document is identified in the body of the EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this EIR.

This EIR relies on a number of Project-specific technical appendices that are bound separately as *Technical Appendices*. The *Technical Appendices* are available for review at the San Bernardino County Planning Division, 385 N. Arrowhead Ave., San Bernardino, CA 92415, during the County's regular business hours; can be reviewed in digital format on the County's website at https://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx; or by contacting the County Planning Division. The individual technical studies, reports, and supporting documentation that comprise the *Technical Appendices* are as follows:

A: Notice of Preparation and Written Comments on the NOP
B: Air Quality Impact Analysis
C: Mobile Source Health Risk Assessment
D: Biological Resources Report
E: Cultural Resources Study
F: Energy Analysis
G: Geotechnical Investigation
H: Paleontological Assessment
I: Greenhouse Gas Analysis

J: Phase I Environmental Site Assessment
K: Phase II Environmental Site Assessment
L: Preliminary Drainage Report
M: Preliminary Water Quality Management Plan
N: Noise Analysis
O: Vehicle Miles Traveled (VMT) Screening Analysis
P: Trip Generation Assessment

Other reference sources that are incorporated into this EIR by reference are listed in Section 7.0, *References*, of this EIR. In most cases, documents or websites not included in the EIR's Technical Appendices are cited by a link to the online location where the document/website can be viewed. References relied upon by this EIR will be available for public review at the San Bernardino County Planning Division, 385 N. Arrowhead Ave., San Bernardino, CA 92415.

2.0 Environmental Setting

2.1 Regional Setting and Location

The approximately 17.7-acre Project Site is located within the "Donut Hole" area of unincorporated San Bernardino County, adjacent to the City of Redlands. The "Donut Hole" area is surrounded on all sides by the City of Redlands, with the City of Highland located farther to the north, the unincorporated community of Mentone and the City of Yucaipa farther to the east, the Cities of Loma Linda and Colton farther to the southwest, and the City of San Bernardino farther to the west. The Project Site is located approximately 0.7-mile west of State Route 210 (SR-210) and approximately 1.3 miles north of Interstate 10 (I-10).

The Project Site is located in a Census Bureau-defined urbanized area of San Bernardino County. The Southern California Association of Governments (SCAG) estimates that San Bernardino County as a whole had a population in 2020 of 2,250,000. SCAG estimates that the County's population will increase to 2,815,000 by 2045 (SCAG, 2020a, Demographics and Growth Forecast Technical Appendix, p. 29).

2.2 Local Setting and Location

The Project Site abuts Nevada Street on the west and is located approximately 650 feet north of Palmetto Avenue. The Project Site includes Assessor Parcel Numbers (APNs) 0292-041-08 and -44 in unincorporated San Bernardino County and APN 0292-041-38 in the City of Redlands. The Project Site is located within Section 23, Township 12 North, Range 3 West, San Bernardino Baseline and Meridian.

2.3 Surrounding Land Uses

Existing land uses in the immediate vicinity of the Project Site are illustrated on Figure 2-1, *Surrounding Land Uses*, and are described below.

North: To the north of the Project Site is the City of Redlands Wastewater Treatment Plant (WWTP). Adjacent to and north of the WWTP the Santa Ana River.

West: Nevada Street abuts the Project Site on the west; west of Nevada Street is the California Street Landfill owned and operated by the City of Redlands. A warehouse distribution facility is also located west of the Project Site, to the south of the landfill.

South: A warehouse facility is located immediately to the south of the Project Site. Farther south of the Site, south of Palmetto Avenue, is vacant undeveloped land and a warehouse facility.

East: A warehouse facility abuts the Project Site on the east. Farther east of the Project Site, east of Alabama Street, are multiple warehouse facilities.

2.4 PLANNING CONTEXT

2.4.1 COUNTYWIDE PLAN

The prevailing planning document for unincorporated areas of San Bernardino County is the Countywide Plan. The Countywide Plan designates the Project Site for "General Industrial (GI)" land uses (see Figure 2-2, *Countywide Plan Land Use Map*). The GI land use designation is intended for areas that are suitable for general and heavy industrial activities that generates substantial odors, noise, vibration, and/or truck traffic. Land uses that typically allowed within the GI land use designation include but are not limited to wholesale, warehouse, and distribution, manufacturing and processing, and transportation services.

2.4.2 ZONING

The zoning for the Project Site and surrounding area is established by the County's East Valley Area Plan (EVAP). The EVAP assigns the "Regional Industrial (EV/IR)" zone to the Project Site. Within the EV/IR zone, permitted land uses generally include research and development, manufacturing and industrial, wholesale trade, warehousing and distribution, and services that are supportive of the aforementioned land uses. Prohibited land uses within the EV/IR zone include but are not limited to residential uses and commercial retail uses.

2.4.3 SCAG REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITIES STRATEGY

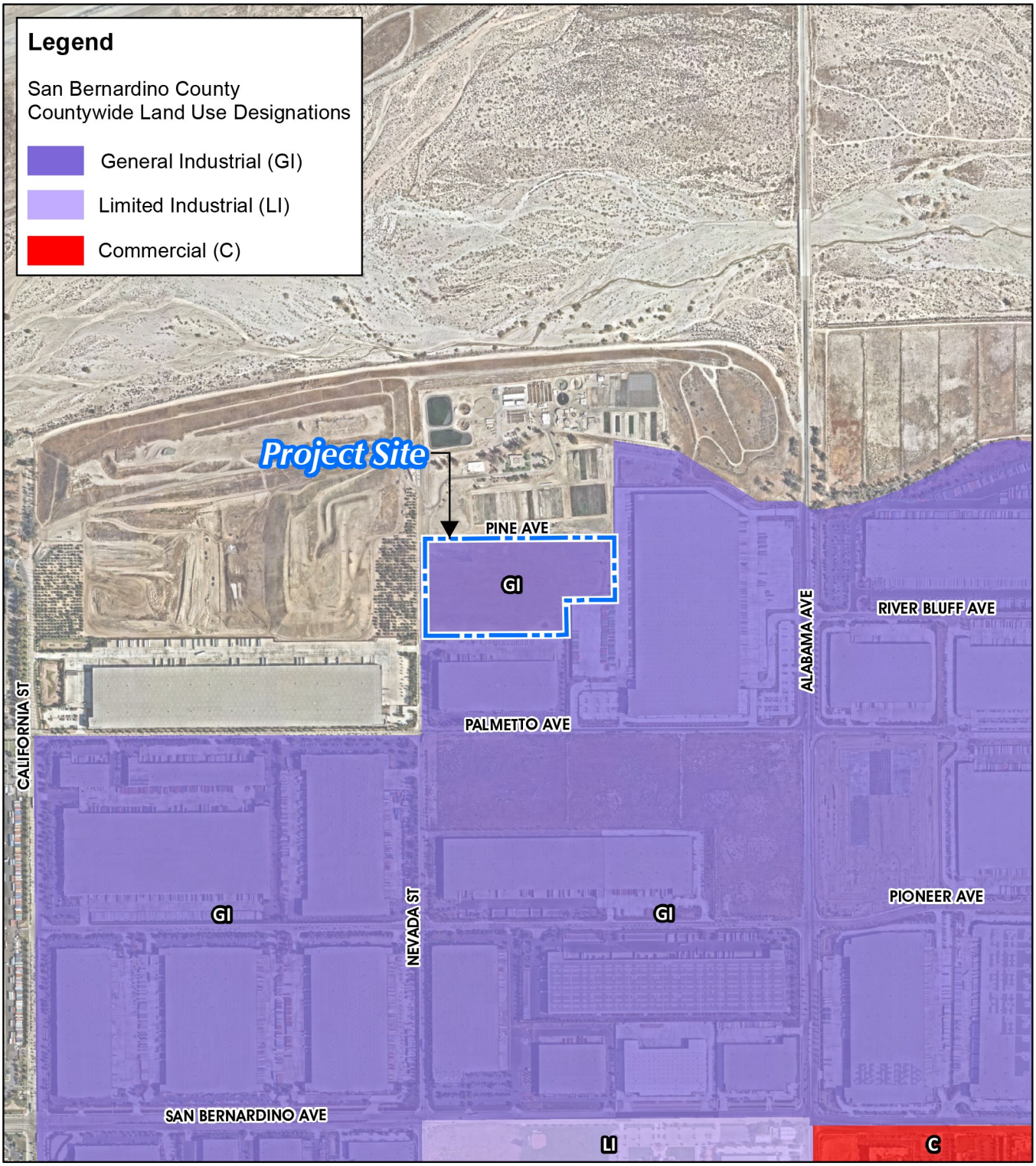
SCAG is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project Site is within SCAG's regional authority. On September 3, 2020, SCAG's Regional Council approved and adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* ("*Connect SoCal*"). *Connect SoCal* is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. The goals of *Connect SoCal* are to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; 10) Promote conservation of natural and agricultural lands and restoration of habitats. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2020b)

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

Figure 2-1

0 125 250 500 Feet

Surrounding Land Uses



Source(s): ESRI, Nearmap Imagery (2022), San Bernardino County (2020)

Figure 2-2

0 250 500 1,000 Feet

Countywide Plan Land Use Map

2.5 EXISTING PHYSICAL SITE CONDITIONS

CEQA Guidelines Section 15125(a)(1), recommends that the physical environmental condition that existed at the time an EIR's NOP is released for public review normally be used as the comparative baseline for the EIR analysis. The NOP for this EIR was released for public review on March 31, 2022, and a description of the Project Site's physical environmental condition ("existing conditions") as of that approximate date is provided in the following subsections. More information regarding the Project Site's environmental setting is provided in the specific subsections of EIR Section 4.0, *Environmental Analysis*.

2.5.1 LAND USE

Under existing conditions, the Project Site is vacant and undeveloped, as illustrated on Figure 2-3, *Aerial Photograph*. From at least 1930 to 1975, the Project Site was used as an orchard; the Site was vacant from 1975 to approximately 1985; and was used for row crop production between approximately from 1989 to 2014 (V3, 2021, p. 1). Agricultural production on the Project Site ceased in 2014. The northwest corner of the Project Site was used for the storage of dumpster trailers beginning between 2016-2018 and ending in 2021 (Google Earth, 2022).

2.5.2 AESTHETICS AND TOPOGRAPHIC FEATURES

The Project Site slopes very gradually from east to west, with a high point of approximately 1,204 feet above mean sea level (amsl) at the northeast corner of the Site and a low point of approximately 1,181 amsl at the northwest corner of the Site. Figure 3-3, *USGS Topographic Map*, in EIR Section 3.0 depicts the Project Site's existing topographical conditions. The Project Site is visually characterized as an undeveloped, open field with ruderal vegetation, see Figure 2-4, *Site Photographs*. There are no rock outcroppings or other unique historic or aesthetic features present on the property under existing conditions.

2.5.3 AIR QUALITY AND CLIMATE

The Project Site is located in the 6,745-square-mile South Coast Air Basin (SCAB), which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, the San Jacinto Mountains to the north and east, and San Diego County to the south. The SCAB is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD), the agency charged with bringing air quality in the SCAB into conformity with federal and State air quality standards. As documented in the Project's Air Quality Impact Analysis (*Technical Appendix B1* to this EIR), although the climate of the SCAB is characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. More than 90% of the SCAB's rainfall occurs from November through April. Temperatures during the year range from an average minimum of 36°F in January to over 100°F in the summer. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Ana[s]" each year. (Urban Crossroads, 2022a, pp. 9-10)

At the regional level, air quality in the SCAB has improved over the past several decades; however, the SCAB is currently not in attainment of State and/or federal standards established for Ozone (O_3; one-hour and eight-hour), particulate matter (PM_{10} [State standard only] and $PM_{2.5}$), and Lead (only in the Los Angeles County portion of the SCAB). No areas of the SCAB exceeded federal or State standards for nitrogen dioxide (NO_2), sulfur dioxide (SO_2), or carbon monoxide (CO). (Urban Crossroads, 2022a, Table 2-3)

The census tract containing the Project Site is in the 94th percentile for pollution burden which, based on the census tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area within the 72nd percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022).

Refer to EIR Subsections 4.1, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*, for a more detailed discussion of the existing air quality and climate setting in the Project area.

2.5.4 Geology

Regionally, the Project Site is located in the Peninsular Ranges geomorphic province, a prominent natural geomorphic province that extends from the Santa Monica Mountains approximately 900 miles south to the tip of Baja California, Mexico, and is bounded to the east by the Colorado Desert. The Peninsular Ranges province is composed of plutonic and metamorphic rock, lesser amounts of Tertiary Volcanic and sedimentary rock, and Quaternary drainage in-fills and sedimentary veneers. Near the surface, the Project Site is underlain by middle Holocene Young axial-valley deposits (BFSA, 2022b).

The geologic structure of the entire southern California area is dominated mainly by northwest-trending faults associated with the San Andreas system. Similar to other properties throughout southern California, the Project Site is located within a seismically active region and is subject to ground shaking during seismic events; however, no known active or potentially active faults exist on or near the Project Site nor is the site situated within an "Alquist-Priolo" Earthquake Fault Zone (SCG, 2021, p. 10).

The Project Site is underlain by artificial fill and alluvium (SCG, 2021, p. 6). Artificial fill extends to depths ranging from 4.5 to 8 feet below the site surface, and generally loose silty fine sands and fine sandy silts. Native alluvium occurs on the Project Site to a minimum depth of 25 feet in depth below existing site grades. Native alluvium consists of loose to medium dense silty fine sands, fine sandy silts, and fine to medium sands.

2.5.5 Hydrology

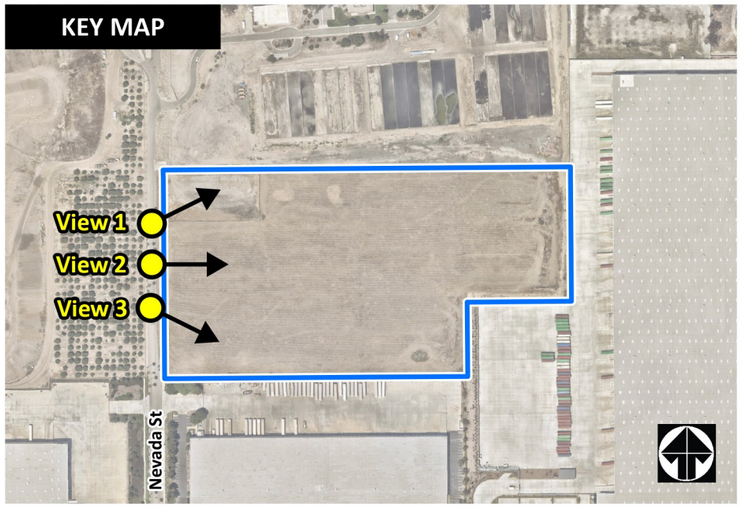
The Project Site is located in the Santa Ana River watershed, which drains an approximately 2,650-square-mile area. The Santa Ana River starts in Santa Ana Canyon east of the Project Site in the San Bernardino Mountains and runs southwesterly through San Bernardino, Riverside, and Orange Counties, where it discharges into the Pacific Ocean at the City of Huntington Beach.

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

Figure 2-3

0 75 150 300 Feet

Aerial Photograph



View 1: From Nevada Street, looking northeast towards the Project Site.

View 2: From Nevada Street, looking east towards the Project Site.

View 3: From Nevada Street, looking southeast towards the Project Site.

Figure 2-4

Not to Scale

Site Photographs

Under existing conditions, the Project Site drains to the northwest. Rainfall runoff sheet flows across the Project Site to Nevada Street; most of the runoff from the Site surface drains from Nevada Street to the Santa Ana River while a small portion of the runoff from the Site is collected by an existing catch basin within Nevada Street (Thienes, 2021, p. 1).

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06071C8704H, the Project Site is located within FEMA Flood Zone X. Flood Zone X is correlated with areas of minimal flood hazard, defined as less than a 0.2 percent annual chance of flood (FEMA, 2008).

Refer to EIR Subsection 4.9, *Hydrology and Water Quality*, for a more detailed discussion of the Project's Site existing hydrology and water quality setting.

2.5.6 Noise

Primary sources of noise in the Project Site's vicinity include transportation-related noise associated with surface streets and the abutting railroad. Urban Crossroads, Inc. collected 24-hour noise measurements at three locations in the Project vicinity to determine the baseline for the existing noise environment. Measured daytime noise levels in the area ranged from 52.6 equivalent level decibels (dBA L_{eq}) to 75.2 dBA L_{eq} and nighttime noise levels from 54.3 dBA L_{eq} to 73.5 dBA L_{eq} (Urban Crossroads, 2022e, p. 24). The observed noise levels are typical of quiet-to-noisy urban areas (San Bernardino County, 2019; p. 5.12-3).

Refer to EIR Subsection 4.10, *Noise*, for a more detailed discussion of the Project Site's existing noise setting.

2.5.7 Transportation

The Project Site abuts Nevada Street on the west while Palmetto Avenue is located approximately 650 feet south of the Project Site. Existing traffic on nearby roadways consist of both passenger vehicles and trucks passing through the area and accessing nearby land uses.

The primary regional vehicular travel routes to the Project area are SR-210 and I-10. The Project Site is located approximately 1.5 miles (driving distance) west of the San Bernardino Avenue on/off ramps to SR-210 and approximately 1.9 miles (driving distance) north of the California Street on/off ramps to I-10.

There are no existing bicycle facilities within the Project Area and limited, non-contiguous sidewalks in the vicinity of the Project Site. There is no public transit service in the vicinity of the Project Site (San Bern. Co., 2020, Policy Map TM-2; Google Earth, 2022).

Refer to EIR Subsection 4.11, *Transportation*, for a more detailed discussion of the Project Site's existing transportation setting.

2.5.8 Utilities and Service Systems

The Redlands Municipal Utilities Department provides water service to the Project area; under existing conditions a 12-inch-diameter potable water main and a 24-inch-diameter reclaimed water main are installed

beneath Nevada Street abutting the Project Site. The Redlands Municipal Utilities Department also provides wastewater treatment service to the Project area. Under existing conditions, a 27-inch-diameter sewer main is installed beneath Nevada Street abutting the Project Site; this main conveys wastewater flows to the Redlands Wastewater Treatment Plant that abuts the Project site on the north.

Solid waste from the Project Site would be disposed at the County-owned Mid-Valley Sanitary Landfill and/or San Timoteo Sanitary Landfill.

2.5.9 Vegetation Communities

Non-native grassland covers all but the northwest corner of the Project Site; the northwest corner of the Site is classified as disturbed habitat. The non-native grassland on the Project Site is primarily composed of non-native grasses such as ripgut grass (*Bromus diandrus*), red brome (*Bromus rubens*), Mediterranean schismus (*Schismus barbatus*), and soft chess (*Bromus hordeaceus*). The disturbed habitat on the Project Site has been mostly cleared and leveled and was most recently used for the storage of dumpster trailers. Plant species observed on the portion of the Site classified as disturbed habitat include include Russian thistle (*Salsola tragus*), lamb's quarters (*Chenopodium album*), tree tobacco (*Nicotiana glauca*), and cheeseweed (*Malva parviflora*). (Alden, 2022, pp. 3-4)

2.5.10 Rare and Unique Resources

As required by CEQA Guidelines Section 15125(c), the environmental setting should place special emphasis on resources that are rare or unique to that region and would be affected by a project. Based on the existing conditions of the Project Site and surrounding area described above and as discussed in more detail in Section 4.0, *Environmental Analysis*, the Project Site does not contain any resources that are rare or unique to the region.

3.0 PROJECT DESCRIPTION

This section provides all of the information required of an EIR Project Description by CEQA Guidelines Section 15124, including a description of the Project's precise location and boundaries; a statement of the Project's objectives; a description of the Project's technical, economic, and environmental characteristics; and a description of the intended uses of this EIR (including a list of the government agencies that are expected to use this EIR in their decision-making processes); a list of the permits and approvals that are required to implement the Project; and a list of related environmental review and consultation requirements.

3.1 PROJECT LOCATION

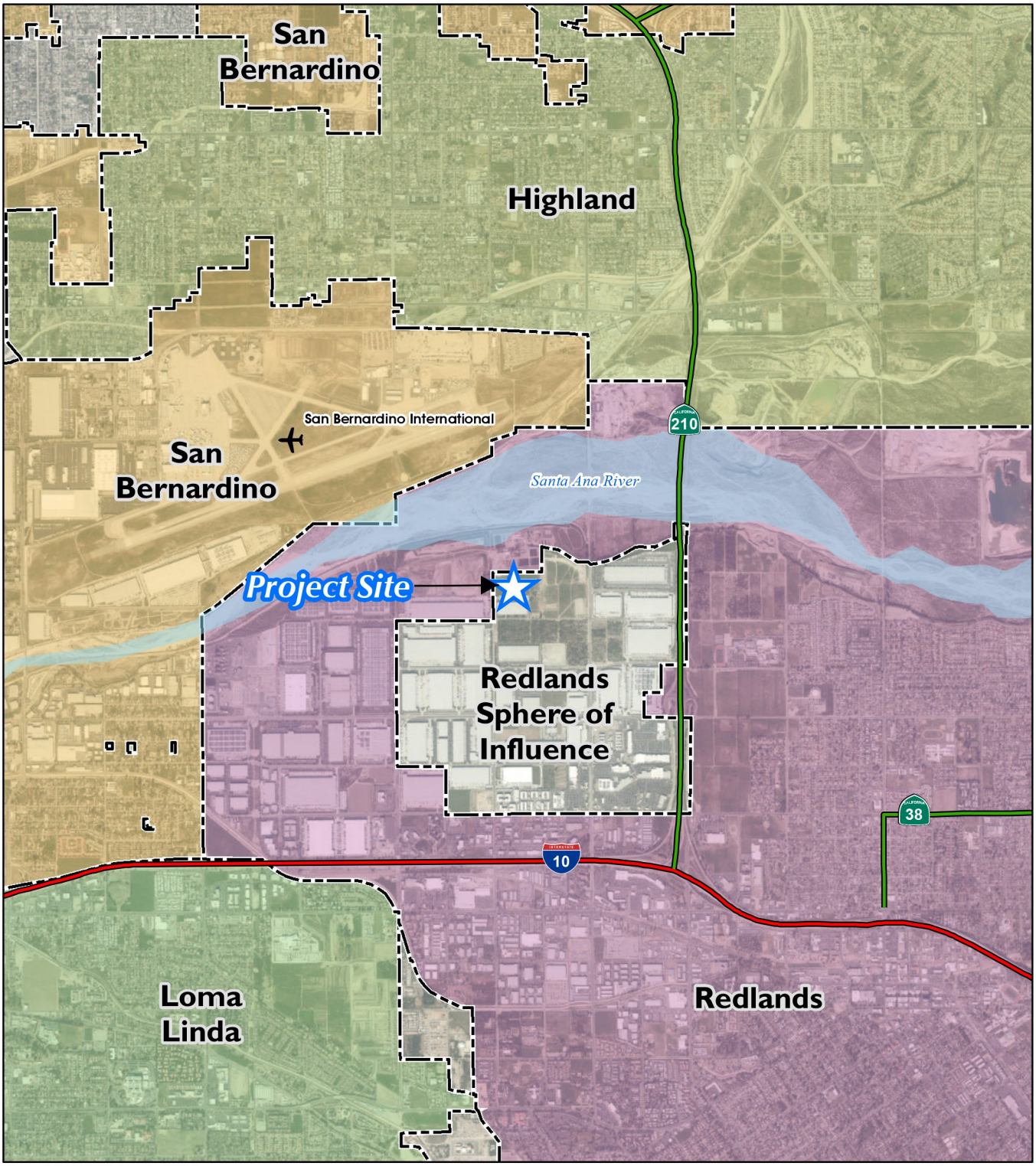
The Project Site is located within the area of unincorporated San Bernardino County referred to as the "Donut Hole." As shown on Figure 3-1, *Regional Map*, the "Donut Hole" area is surrounded on all sides by the City of Redlands, with the City of Highland located farther to the north, the unincorporated community of Mentone and the City of Yucaipa farther to the east, the cities of Loma Linda and Colton farther to the southwest, and the City of San Bernardino farther to the west.

The Project Site abuts Nevada Street on the west and is located approximately 650 feet north of Palmetto Avenue (see Figure 3-2, *Vicinity Map*, and Figure 3-3, *USGS Topographic Map*). The Project Site includes Assessor Parcel Numbers (APNs) 0292-041-08 and -44 in unincorporated San Bernardino County and APN 0292-041-38 in the City of Redlands. The Project Site is located within Section 23, Township 12 North, Range 3 West, San Bernardino Baseline and Meridian.

3.2 STATEMENT OF OBJECTIVES

The Project seeks to develop a distribution center building on an approximately 17.7-acre property, in conformance with the land use designation applied to the subject property by the Countywide Plan and the East Valley Area Plan. The Project would achieve this goal through the following objectives.

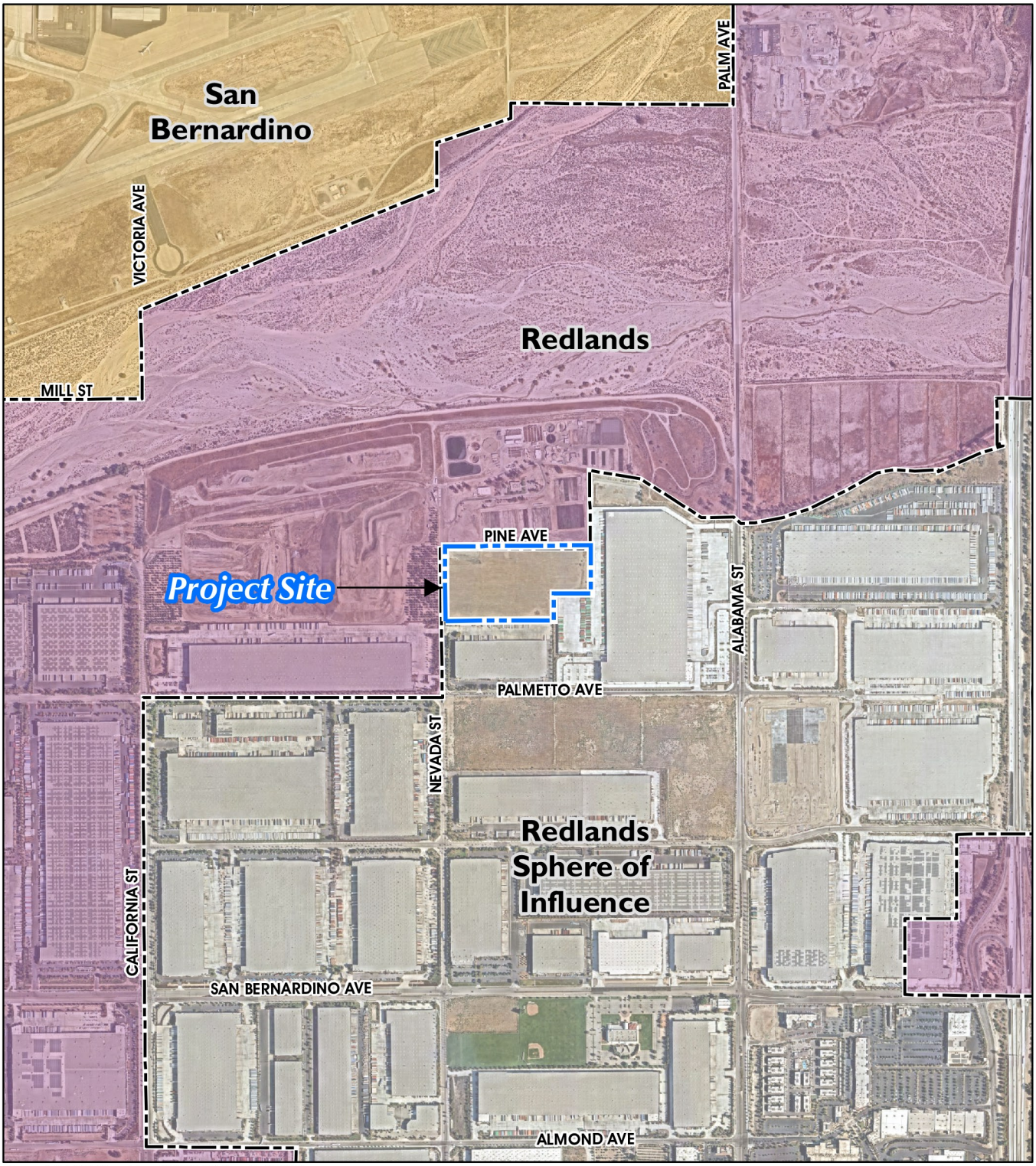
1. To expand economic development in San Bernardino by developing an underutilized property with an in-demand industrial use within an area that is planned for long-term industrial development.
2. To make efficient use of a property by maximizing its buildout potential for employment-generating uses.
3. To attract employment-generating businesses to San Bernardino County to reduce the need for members of the local workforce to commute outside the area for employment.
4. To develop an industrial building in close proximity to the California highway system that can be used as part of the southern California supply chain and goods movement network.
5. To develop an industrial building on a property with no adjacent sensitive receptors and with operational characteristics that are compatible with other existing and planned land uses in the immediate vicinity of the Project Site.
6. To develop a property that has access to available infrastructure, including roads and utilities.



Source(s): ESRI, SB County (2022)

Figure 3-1

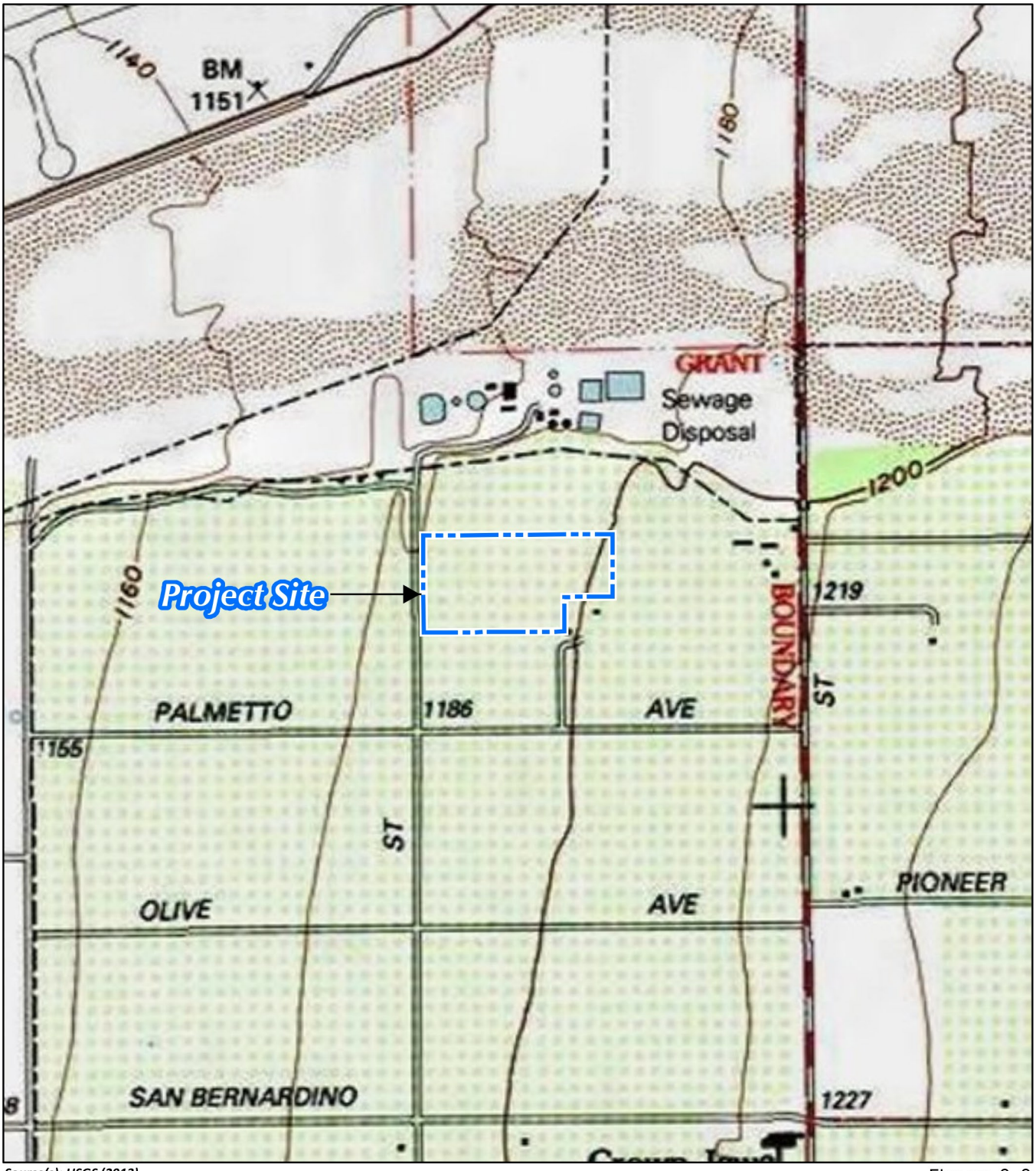
Regional Map



Source(s): ESRI, NearMap (2022), SB County (2022)

Figure 3-2

Vicinity Map



Source(s): USGS (2013)

Figure 3-3

0 250 500 1,000 Feet

USGS Topographic Map

3.3 PROJECT COMPONENTS

The Project involves the development of a distribution center building on approximately 17.7 acres of land. Discretionary approvals requested from San Bernardino County include a Conditional Use Permit (CUP) and a Lot Merger (LM). San Bernardino County has assigned these two applications, collectively, the project case number of PROJ-2022-00012. Approval of these applications would allow for the development of a 380,579 square foot (s.f.) distribution center building. The individual components of the Project are discussed below and on the following pages.

3.3.1 CONDITIONAL USE PERMIT

The proposed CUP provides for the construction and operation of a distribution center building. The Project plans submitted with the CUP application include the proposed layout/design of the Project Site, a conceptual landscaping plan, and a conceptual architectural design for the building.

A. Conceptual Site Plan

The proposed site plan for the Project is illustrated on Figure 3-4, *Conceptual Site Plan*. The proposed building would include 380,579 s.f. of total building floor area, including 372,079 s.f. of warehouse space and 8,500 s.f. of ancillary office uses (5,000 s.f. on the ground floor and 3,500 s.f. on the mezzanine level). The office spaces would be located at either the southwest or southeast corners of the building; these locations also would serve as the primary entrances to the building. Fifty-eight (58) loading dock doors are proposed along the northern façade of the building. The loading dock doors open to a truck court that provides 84 trailer parking stalls and is secured by an 8-foot-tall tube steel fence. A total of 238 parking spaces for passenger vehicles are provided on the Project Site; most of the spaces are proposed on the southern portion of the Site with the remainder proposed on the western and eastern portions of the Site. Access to the Project would be provided by two driveways from Nevada Street, at the northwest and southwest corners of the Project Site, respectively. Both of the driveways provided by the Project would be utilized by passenger vehicles while truck traffic would be limited to the northern driveway.

B. Architectural Design

Figure 3-5, *Conceptual Building Elevations*, depicts the proposed building elevations. The proposed building would feature a varied roofline with a maximum height of 50 feet, as measured from the finished floor elevation to the top of parapets. The building would be constructed of concrete tilt-up panels and low-reflective glass. The building's exterior color palette would be comprised of various shades of white, cream and gray colors, with indigo-colored paint used as accents; windows would feature blue glazing. Decorative building elements include a varied roofline, horizontal offsets, window mullions, and canopies and wood-effect siding at office entries.

SITE LEGEND

- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- ASPHALT CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 18')
- DISABLED PARKING STALL (9' X 18') + 5' W/ ACCESSIBLE AISLE
- DISABLED PARKING (VAN) STALL (12' X 18') + 5' W/ ACCESSIBLE AISLE
- LANDSCAPED AREA
- PATH OF TRAVEL
- 20' FIRE WIDE FIRELANE
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT- APPROXIMATE LOCATION

SITE PLAN KEYNOTES

1. HEAVY BRCOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY
4. DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. PRE-CAST CONCRETE WHEEL STOP
6. 8' H. METAL, MANUAL SLIDING GATES W/ KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. EXTERIOR CONCRETE STAIR.
8. LANDSCAPE. SEE CONCEPTUAL LANDSCAPE PLAN.
9. CONC. FILLED GUARD POST 8" DIA. U.N.O. 42" H
10. EXTERIOR BIKE RACK.
11. SMOKING AREA.
12. APPROXIMATE LOCATION OF TRANSFORMER.
13. ACCESSIBLE ENTRY SIGN
14. 8' H. TUBE STEEL FENCE.
15. TRASH ENCLOSURE PER CITY STANDARD.
16. FIRE LANE ENTRANCE SIGN.
17. TRUNCATED DOME.
18. ACCESSIBLE PARKING STALL SIGN.
19. CONCRETE CURB. SEE CIVIL DRAWINGS.

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD
2. 2" SOILS ARE EXPANSIVE IN NATURE. USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
16. ALL GROUND MOUNTED UTILITY STRUCTURES SUCH AS TRANSFORMERS, HVAC EQUIPMENT AND BACK FLOW PREVENTION VALVES SHALL BE LOCATED OUT OF VIEW FROM A PUBLIC STREET OR ADEQUATELY SCREENED THROUGH THE USE OF LANDSCAPING AND/OR MASONRY WALLS.

TABULATION

SITE AREA	
In s.f.	770,726 s.f.
In acres	17.69 ac
BUILDING AREA	
Office - 1st floor	5,000 s.f.
Mezzanine	3,500 s.f.
Warehouse	372,079 s.f.
TOTAL	380,579 s.f.
COVERAGE	49.4%
CLEAR HEIGHT	40 feet
AUTO PARKING REQUIRED	
Office: 1/250 s.f.	34 stalls
Whse: 1st 40K @ 1/1,000 s.f.	40 stalls
above 40K @ 1/4,000 s.f.	85 stalls
TOTAL	159 stalls
AUTO PARKING PROVIDED	
Standard (9' x 19')	213 stalls
TRAILER PARKING PROVIDED	
Trailer (10' x 55')	84 stalls
ZONING ORDINANCE FOR CITY:	
Zoning Designation - EV-RE(Regional Industrial)	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50'	
MAXIMUM FLOOR AREA RATIO	
FAR - .55	
LANDSCAPE REQUIREMENT	
Percentage - 15%	
LANDSCAPE PROVIDED	
Percentage	15.00%
In s.f.	115,580 s.f.
SETBACKS	
Front / Street Side - 25'	
Side - 10' (Only one side is required and if not designated commercial or industrial.	
Rear - 10' (req. only if adjacent is not designated commercial or industrial.	

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF REDLANDS, IN COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THOSE PORTIONS OF LOTS 3 AND 4, BLOCK 2 OF MAP SHOWING WEIMAN SUBDIVISION OF LOTS 1, 2, 3 AND 4 OF BLOCK 2 AND LOTS 1, 2, 3 & 4, 13, 14, 15 AND 16 OF BLOCK 3 OF MAP NO. 1 OF THE HOMER L. WILLIAMS TRACT, A PLAT RECORDED IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 6, PAGE 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, TOGETHER WITH THE SOUTH HALF OF PINE AVENUE ENCROSED SHOWN ON SAID MAP, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF THE SOUTH 235.00 FEET OF SAID LOTS 3 AND 4, BLOCK 2;

THENCE ALONG THE WEST LINE OF SAID LOT 3, BLOCK 2 AND ITS NORTHERLY PROLONGATION NORTH 35° 35' 24" EAST, 424.53 FEET TO THE CENTERLINE OF SAID VACATED PINE AVENUE;

THENCE ALONG SAID CENTERLINE, NORTH 89° 51' 47" WEST, 1266.16 FEET TO THE NORTHERLY PROLONGATION OF THE WEST LINE OF SAID LOT 4, BLOCK 2 SAID WEST LINE ALSO BEING THE EAST LINE OF NEVADA STREET (60.00 FEET WIDE) AS SHOWN ON SAID MAPS;

THENCE ALONG SAID WEST LINE AND NORTHERLY PROLONGATION, SOUTH 00° 34' 35" WEST, 424.63 FEET TO THE NORTH LINE OF SAID SOUTH 235.00 FEET OF LOTS 3 AND 4, BLOCK 2;

THENCE ALONG SAID NORTH LINE, SOUTH 89° 51' 48" EAST, 1266.12 FEET TO THE POINT OF BEGINNING.

CONTAINING: 541,376 SQUARE FEET OR 12.56 ACRES MORE OR LESS.

PARCEL 2:

THOSE PORTIONS OF LOTS 3 AND 4, BLOCK 2 OF MAP SHOWING WEIMAN SUBDIVISION OF LOTS 1, 2, 3 AND 4 OF BLOCK 2 AND LOTS 1, 2, 3 & 4, 13, 14, 15 AND 16 OF BLOCK 3 OF MAP NO. 1 OF THE HOMER L. WILLIAMS TRACT, A PLAT RECORDED IN THE COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 6, PAGE 28 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF THE SOUTH 235.00 FEET OF SAID LOTS 3 AND 4, BLOCK 2, SAID CORNER ALSO BEING ON THE EAST LINE OF NEVADA STREET (60.00 FEET WIDE) AS SHOWN ON SAID MAPS;

THENCE ALONG THE NORTH LINE OF SAID SOUTH 235.00 FEET OF LOTS 3 AND 4, BLOCK 2 SOUTH 89° 51' 48" EAST, 1266.12 FEET TO THE WEST LINE OF THE EAST HALF OF SAID LOT 3 BLOCK 2;

THENCE ALONG SAID WEST LINE, SOUTH 00° 34' 56" WEST, 235.00 FEET TO THE SOUTH LINE OF SAID LOT 3 BLOCK 2;

THENCE ALONG THE SOUTH LINES OF SAID LOTS 3 AND 4, BLOCK 2, NORTH 89° 51' 48" WEST, 654.56 FEET TO THE WEST LINE OF SAID LOT 4, BLOCK 2;

THENCE ALONG SAID WEST LINE, NORTH 00° 34' 35" EAST, 235.00 FEET TO THE POINT OF BEGINNING.

CONTAINING: 225,299 SQUARE FEET OR 5.17 ACRES MORE OR LESS.

APN: 0292-041-044(portion), 292-041-08(portion)

PROJECT INFORMATION

Project Address
NEVADA STREET UNINCORPORATED AREA OF SAN BERNARDINO COUNTY, CA

Owner
PR WMP REDLANDS INDUSTRIAL LLC
A DELAWARE LIMITED LIABILITY COMPANY

BY: MOLTO PROPERTIES REDLANDS LLC
AS MANAGER

555 N. EL CAMINO REAL #A456
SAN CLEMENTE, CA 92672
TEL: 630-576-1105
CONTACT: ANTHONY CINCINELLI

Applicant
LDC INDUSTRIAL REALTY LLC

555 N. EL CAMINO REAL #A456
SAN CLEMENTE, CA 92672
TEL: 949-228-4801
CONTACT: LARRY D. COCHRUN

Applicant's Representatives
HPA, INC.
18831 BARDEEN AVE. - STE #100
IRVINE, CA 92612
CONTACT: MATTHEW LEE
PHONE: (949)-852-2138

Assessors Parcel Number
0292-041-08
0292-041-28
0292-041-44

Zoning
EV/IE - EAST VALLEY / REGIONAL INDUSTRIAL

Code Analysis
2019 CALIFORNIA BUILDING CODE
2019 CALIFORNIA PLUMBING CODE
2019 CALIFORNIA MECHANICAL CODE
2019 CALIFORNIA ELECTRICAL CODE
2019 CALIFORNIA FIRE CODE
2019 CALIFORNIA ENERGY CODE
2019 CALIFORNIA GREEN BUILDING STANDARDS

Construction Type
CONCRETE TILT-UP BUILDING

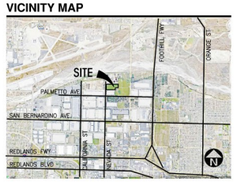
BUILDING OCCUPANCY : S-1 / B
CONSTRUCTION TYPE : II-B

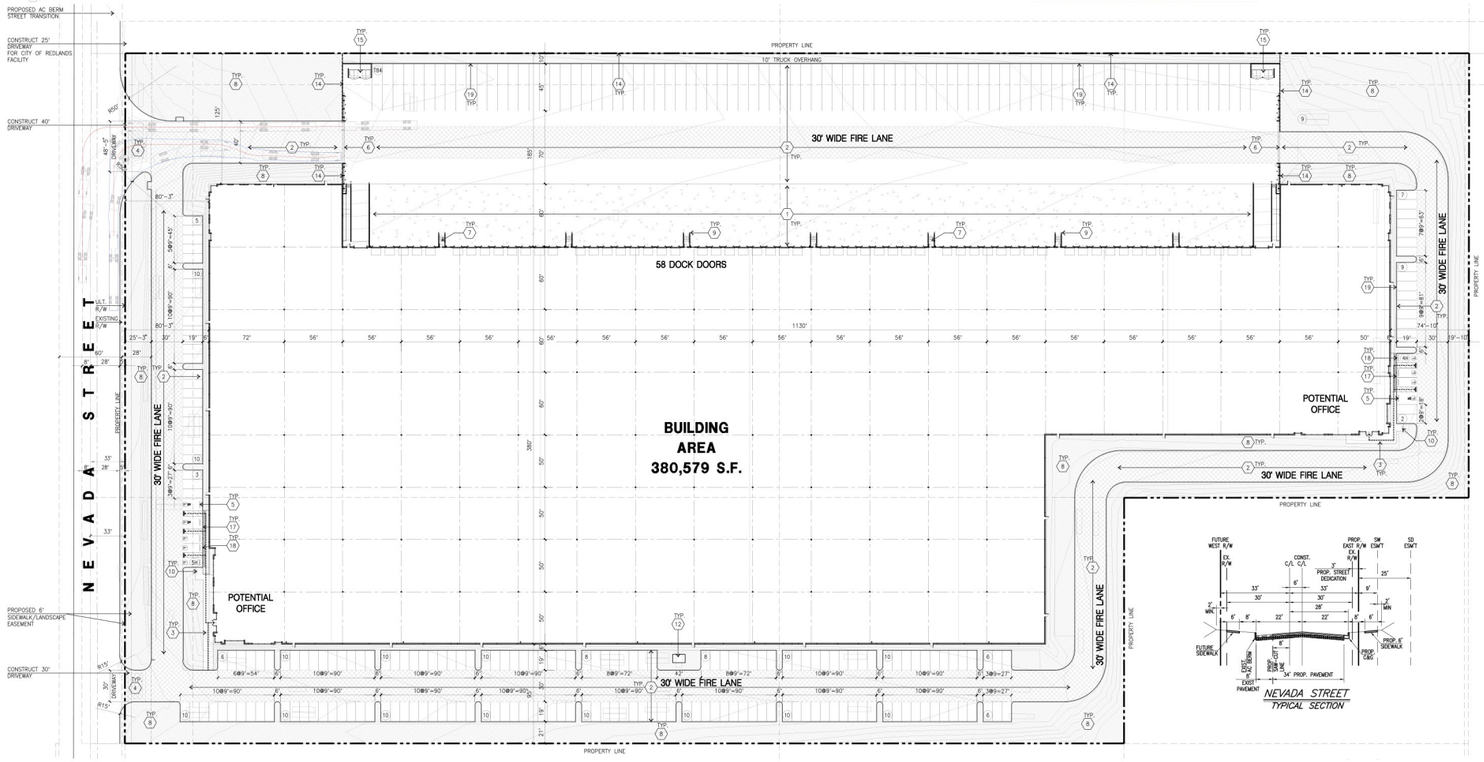
ALLOWED BUILDING HEIGHT : 75'

BUILDING MAXIMUM HEIGHT : 48'
BUILDING HEIGHT : 38'-0" THRU 43'-6"

ESFR SYSTEM

VICINITY MAP





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

Figure 3-4

Not to Scale

Conceptual Site Plan

Source(s): HPA (10-27-2021)

Figure 3-5

Not to Scale

Conceptual Building Elevations

C. Conceptual Landscape Plan

Figure 3-6, *Conceptual Landscape Plan*, depicts the Project's proposed landscape plan. As shown, landscaping would consist of a combination of deciduous and evergreen trees, shrubs, and groundcover. The Project Site's frontage with Nevada Street would be planted with 24-inch box Camphor trees (*Cinnamonium camphora*) and 24-inch box and 15-gallon Brazilian Pepper Trees (*Schinus terebinthifolius*) with Mexican fan palm trees (*Washingtonia robusta*) with 10-foot brown trunk height as accents, as well as shrubs and groundcover. The Project Site's entries from Nevada Street would be planted with 36-inch box Chinese flame trees (*Koelreuteria bipinnata*). Passenger vehicle parking areas would be landscaped with 24-inch box Chitalpa trees (*Chitalpa tashkentensis*) and 15-gallon Brisbane box trees (*Tristania conferta*), along with shrubs and groundcovers. African sumac (*Rhus lancea*), Afghan Pine (*Pinus eldarica*), and desert willow (*Chilopsis linearis*) trees, all 24-inch box size, along with shrubs and groundcovers would be planted along the northwestern, southern and eastern boundaries of the Project Site. Prior to the issuance of a building permit for Project construction, the Project Applicant would be required to submit final planting and irrigation plans to San Bernardino County for review and approval. The plans are required to comply with the "Landscaping Standards" from Chapter 83.10 of the San Bernardino County Development Code, which establishes requirements for landscape design, automatic irrigation system design, and water-use efficiency.

3.3.2 Lot Merger

The proposed LM combines APNs 0292-041-08 and -44 into one lot.

3.4 Project Improvements

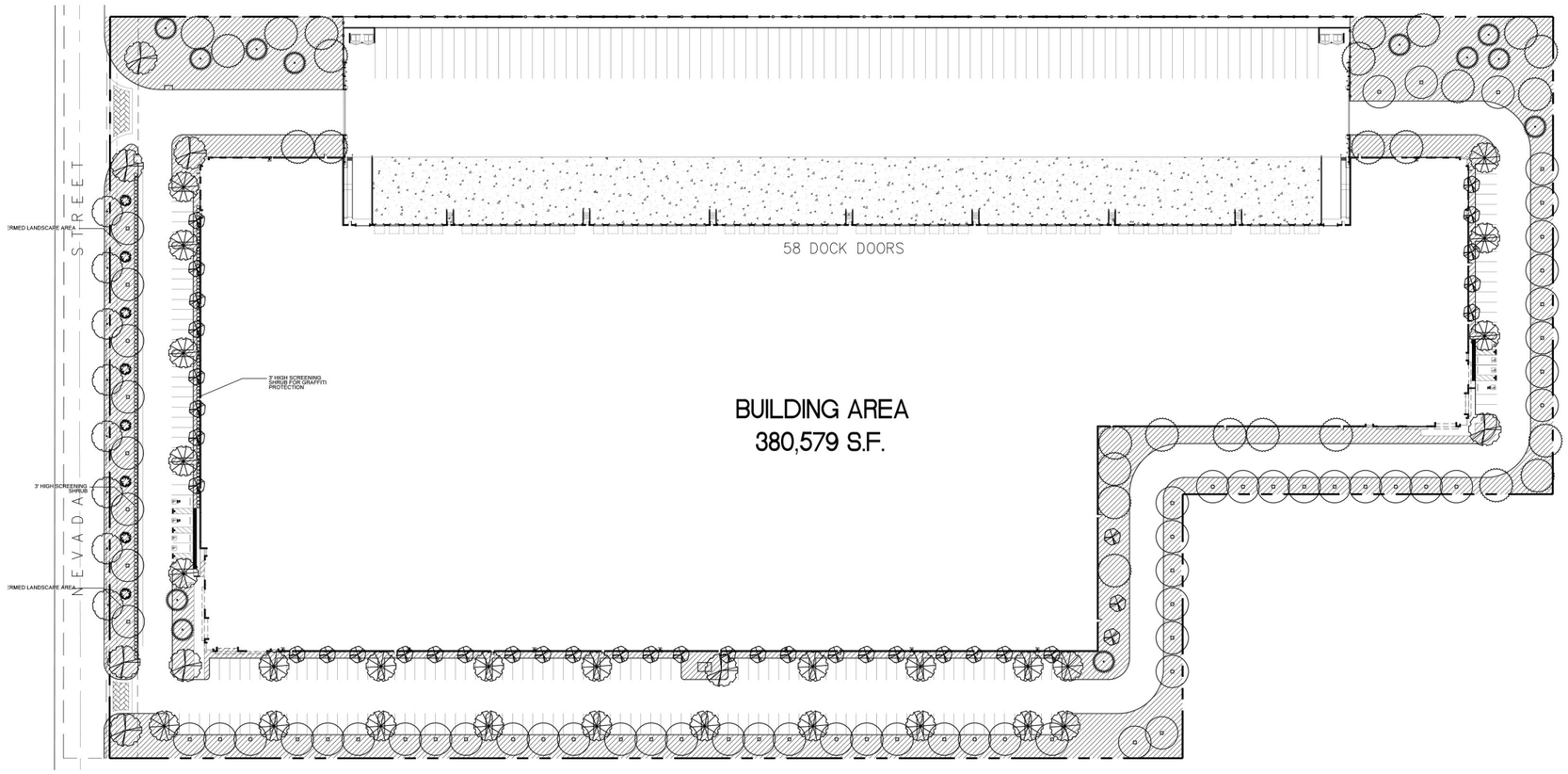
3.4.1 Public Roadway Improvements

Nevada Street abuts the Project Site on the west and is constructed as a paved two-lane road with curb. As part of the Project, Nevada Street would be widened along the Project Site frontage to: 1) provide a 45-foot-wide paved vehicle travel way; 2) curb and gutter on the east side of the street (the existing curb and gutter on the west side of the street would be retained); 3) an 8-foot-wide sidewalk on the east side of the street; and 4) a 6-foot-wide landscape parkway on the east side of the street. The proposed street section would match the existing street section of Nevada Street between Palmetto Avenue and the southern Project Site boundary.

3.4.2 Utility Improvements

A. Water Service

Domestic and recycled water lines, owned and operated by the City of Redlands, are located within Nevada Street. The Project will provide multiple connections to the existing domestic water line within Nevada Steet for service to the proposed building and for the fire protection system and fire hydrants (refer to Figure 3-7, *Conceptual Utility Plan*). All connections to existing water mains would be constructed in accordance with City of Redlands standards.



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Geijera parviflora Australian Willow	15 Gal	12	L	Multi
	Pistaccia chinensis Chinese Pistache	24" Box	26	L	Standard
	Cinnamomum camphora Camphor Tree	24" Box	9	M	Standard
	Koelreuteria bipinnata Chinese Flame Tree	36" Box	8	M	Multi
	Pinus eldarica Afghan Pine	36" Box 24" Box	8 19	L	Standard
	Schinus terebinthifolius Brazilian Pepper Tree	24" Box 15 Gal	21 40	L	Standard
	Tristania conferta Brisbane Box	15 Gal	38	M	Standard
	Washingtonia robusta Mexican Fan Palm	10' bt	8	L	Skinned

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Callistemon citrinus Lemon Bottlebrush	5 Gal	0	M	
	Cassia artemisiodes Feathery Cassia	5 Gal	0	L	
	Dodonaea viscosa Hopseed Bush	5 Gal	0	L	
	Elaeagnus pungens Silverberry	5 Gal	0	L	
	Ligustrum j. Texanum Texas Privet	5 Gal	0	M	
	Rhamnus alaternus Italian Buckthorn	5 Gal	0	L	
	Rhus ovata Sugar Bush	5 Gal	0	L	
	Lavandula sp Lavender	5 Gal	0	L	
	Nerium oleander Oleander	5 Gal	0	L	
	Plumbago auriculata Cape plumbago	5 Gal	0	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave 'Blue Flame' Blue Flame Agave	5 Gal	0	L	
	Agave 'Blue Glow Blue Glow Agave	5 Gal	0	L	
	Aloe striata Coral Aloe	1 Gal	0	L	
	Dasylirion wheeleri Desert Spoon	5 Gal	0	L	
	Hesperaloe parviflora Red Yucca	5 Gal	0	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Baccharis p. 'Pigeon Point' Dwarf Coyote Bush	1 Gal	6' O.C.	L	
	Hypericum calycinum Creeping St. Johnswort	1 Gal	24" O.C.	L	
	Ceanothus Wild Lilac	1 Gal	48" O.C.	L	
	Lantana 'Gold Mound' Yellow Lantana	5 Gal	36" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	
	Santolina chamaecyparissus Lavender Cotton	1 Gal	24" O.C.	L	

◯ 3' High Screening Shrub

PARKING LOT TREES

REQUIRED	PROVIDED	REQUIRED CALIPER SIZE
50% TREES EVERGREEN	69% TREES EVERGREEN	
50% TREES 15 GAL	50% TREES 15 GAL	3/4" to 1"
25% TREES 24 BOX	25% TREES 24 BOX	1-1/4" to 1-3/4"
25% TREES 36 BOX	25% TREES 36 BOX	2-1/2" to 2-3/4"

TOTAL SITE TREES

TYPE	QTY	PERCENTAGE
EVERGREENTREES	146	81%
DECIDUOUS TREES	34	19%
TOTAL	180	

TOTAL PARKING LOT TREES

TYPE	QTY	PERCENTAGE
EVERGREENTREES	59	69%
DECIDUOUS TREES	26	31%
TOTAL	85	

TOTAL BUILDING FRONTAGE TREES

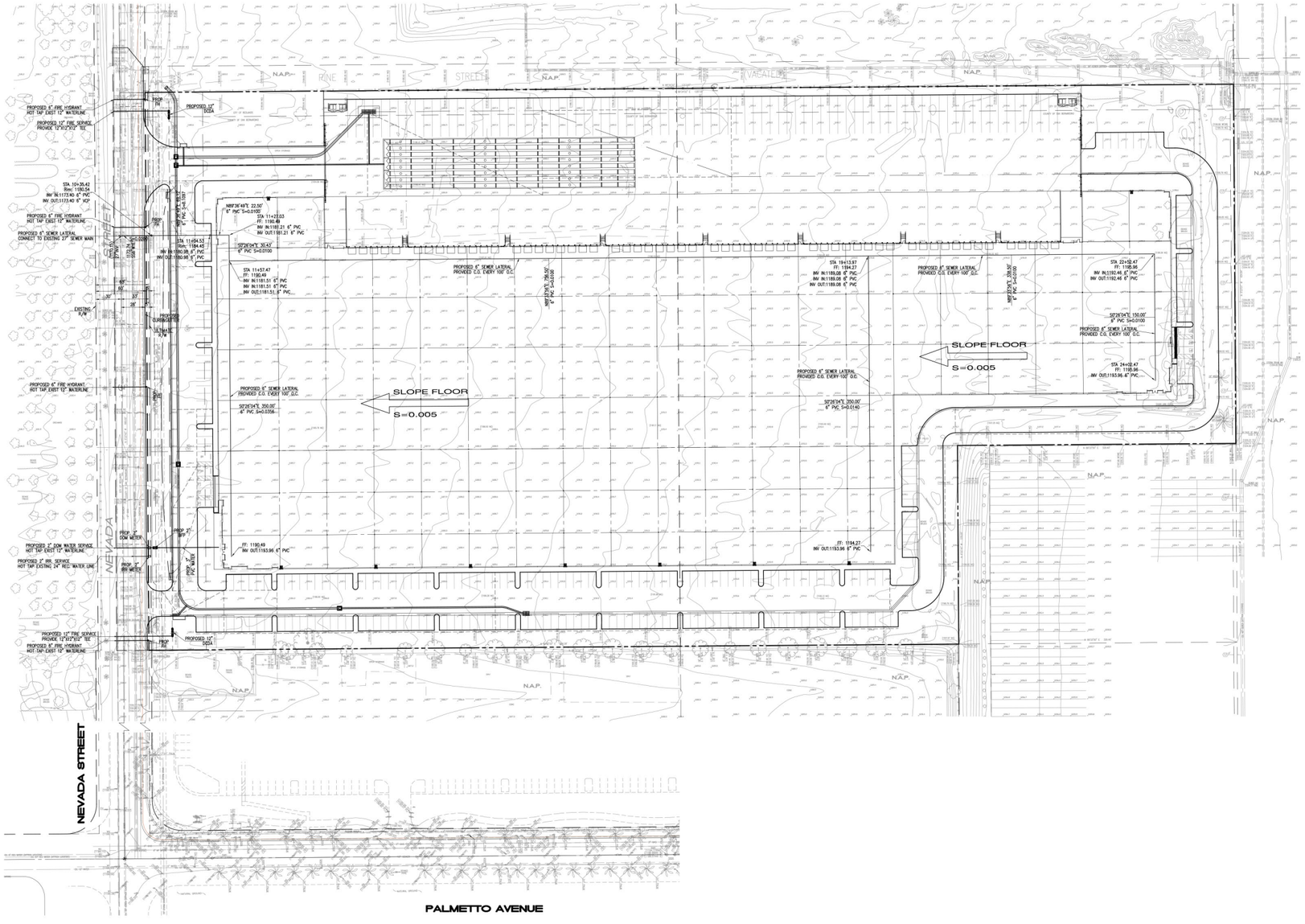
	QTY
BUILDING FRONTAGE (NEVADA ST) LF	440'
TREES REQUIRED (1 TREE PER 30 LF)	15
TREES PROVIDED	15

Source(s): Hunter Landscape (07-28-2022)

Figure 3-6

Not to Scale

Conceptual Landscape Plan



Source(s): Thienes Engineering, Inc. (01-06-2022)

Figure 3-7

Not to Scale

Conceptual Utility Plan

B. Sewer Service

The Project would connect to an existing sewer line within Nevada Street, which is owned and maintained by the City of Redlands (see Figure 3-7). The proposed sewer line connection would be constructed in accordance with City standards.

C. Stormwater Drainage

The Project provides a storm drain system, consisting of a network of catch basins, underground storm drain pipes, and subsurface infiltration chambers that would collect, treat, and discharge peak flows from the property. All surface runoff captured on the Project Site would be directed through catch basins fitted with filters to remove large debris and trash from runoff. First flush" stormwater runoff flows (i.e., typically the first ¾-inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be conveyed to an underground infiltration basin located beneath the truck court on the north side of the proposed building and would percolate through engineered media, then into the ground, for water quality treatment. Once the infiltration basin reaches capacity, flows will bypass the basin and discharge to the existing storm drain beneath Nevada Street. An illustration of the Project's proposed stormwater drainage plan is provided on Figure 3-7.

D. Dry Utilities

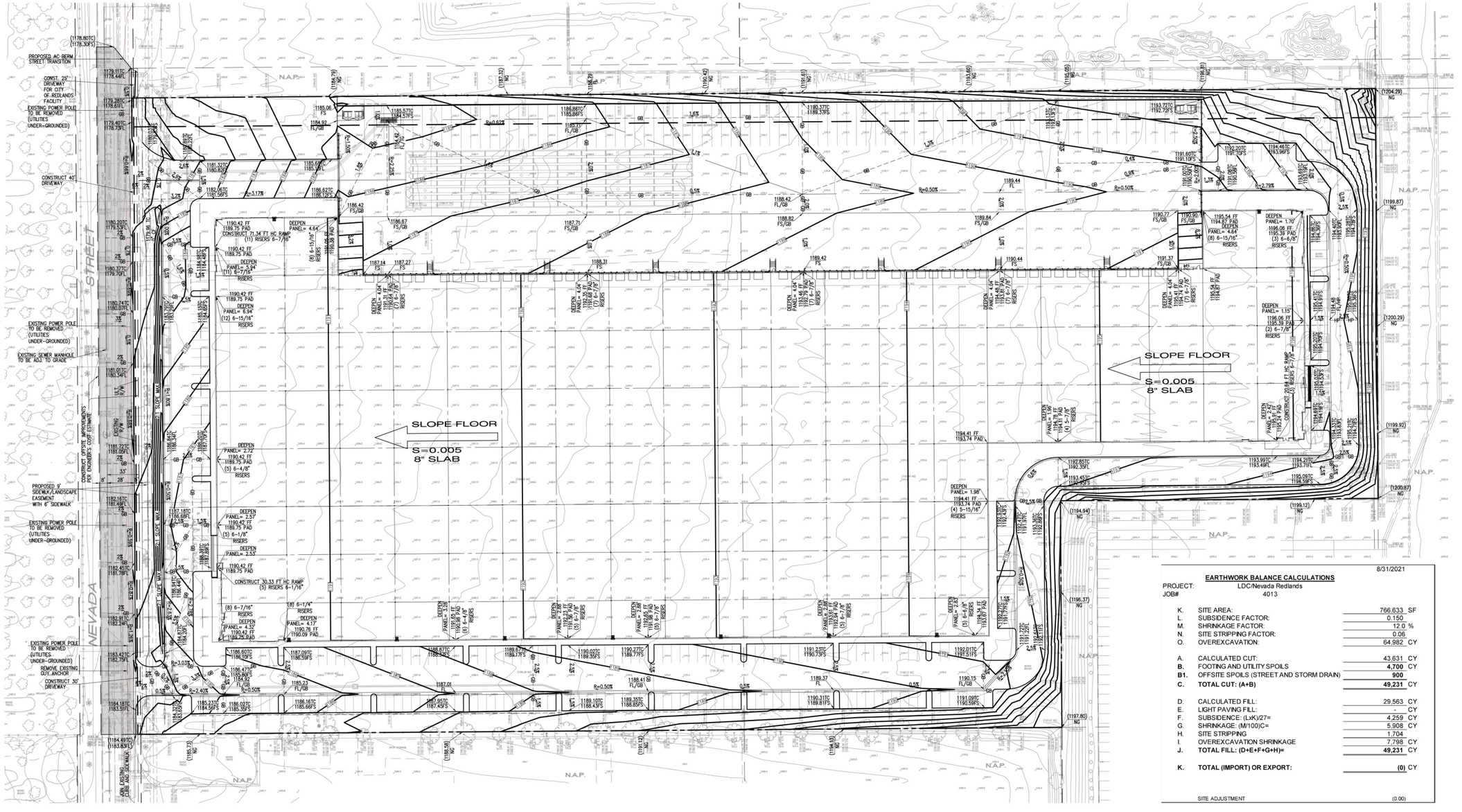
The Project would result in the removal of all existing power poles along the Project Site's frontage with Nevada Street and the overhead electrical transmission lines would be relocated underground. The removal of the power poles and the relocation of the transmission lines would be performed in coordination with Southern California Edison.

3.5 Construction Characteristics

3.5.1 Proposed Physical Disturbance

Implementation of the Project would result in disturbance to the entire 17.7-acre Project Site. With the exception of the proposed water, sewer, and storm drain connections and roadway improvements within Nevada Street, the Project would not result in or require any physical impacts beyond the Project Site boundary. The proposed water, sewer, and storm drain utility connections and roadway improvements would occur entirely within the disturbed and developed right-of-way for Nevada Street.

Figure 3-8, *Conceptual Grading Plan*, depicts the conceptual grading plan for the Site. Grading of the property would entail a total of 49,231 cubic yards (c.y.) of cut and 49,231 c.y. of fill; no import or export of earthwork materials would be required. Manufactured slopes would be created along the eastern boundary of the Project Site; no retaining walls would be created as part of Project grading activities.



EARTHWORK BALANCE CALCULATIONS

8/31/2021

PROJECT: LDC/Nevada Redlands
JOB# 4013

K.	SITE AREA:	766,633	SF
L.	SUBSIDENCE FACTOR:	0.150	
M.	SHRINKAGE FACTOR:	12.0	%
N.	SITE STRIPPING FACTOR:	0.06	
O.	OVEREXCAVATION:	64,982	CY
A.	CALCULATED CUT:	43,631	CY
B.	FOOTING AND UTILITY SPOILS	4,700	CY
B1.	OFFSITE SPOILS (STREET AND STORM DRAIN)	900	
C.	**TOTAL CUT: (A+B)**	49,231	CY
D.	CALCULATED FILL:	29,563	CY
E.	LIGHT PAVING FILL:	-	CY
F.	SUBSIDENCE: (LxK)/27=	4,259	CY
G.	SHRINKAGE: (M/100)C=	5,908	CY
H.	SITE STRIPPING	1,704	
I.	OVEREXCAVATION SHRINKAGE	7,798	CY
J.	**TOTAL FILL: (D+E+F+G+H)=**	49,231	CY
K.	**TOTAL (IMPORT) OR EXPORT:**	(0)	CY
	SITE ADJUSTMENT	(0.00)	

Source(s): Thienes Engineering, Inc. (12-12-2022)

Figure 3-8

Not to Scale

Conceptual Grading Plan

3.5.2 Construction Schedule

The Project Applicant anticipates that the Project's construction process will occur over a 10-month timeframe. Site preparation would occur first, followed by mass-grading and installation of underground infrastructure and retaining walls. Next, fine grading would occur, surface materials would be poured, and the proposed building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed. The estimated Project construction schedule, by construction stage, is summarized in Table 3-1, *Construction Duration*. For purposes of analysis, construction is expected to commence in June 2023 and would last through April 2024.

Table 3-1 Construction Duration

Construction Activity	Start Date	End Date	Days
Site Preparation	06/01/2023	06/02/2023	2
Grading	06/03/2023	07/14/2023	30
Building Construction	07/15/2023	04/19/2024	200
Paving	04/06/2024	04/19/2024	10
Architectural Coating	02/24/2024	04/19/2024	40

Source: (Urban Crossroads, 2022a, Table 3-3)

3.5.3 Construction Equipment

The construction equipment fleet that is estimated to be used for Project construction is summarized in Table 3-2, *Construction Equipment Assumptions*.

Table 3-2 Construction Equipment Assumptions

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

Source: (Urban Crossroads, 2022a, Table 3-4)

Construction workers would travel to the Site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction equipment is expected to operate on the Project Site up to eight

hours per day, six days per week. Even though construction activities are permitted to occur between 7:00 a.m. to 7:00 p.m. on Mondays through Saturdays pursuant to the San Bernardino County Development Code (Section 83.01.080(g)),, as is typical to a construction site, construction equipment is not in continual use and some pieces of equipment are used only periodically throughout a typical day of construction. Thus, eight hours of daily use per piece of equipment is a reasonable assumption.

3.6 Operational Characteristics

The Project would operate as an indoor storage facility; no outdoor materials storage is proposed for the Project Site. The building's interior floor space may be subdivided with partitions/walls to allow the building to be occupied by more than one user. The Project is proposed as a speculative development and the user(s) of the building are not known at this time. The Project is expected to be used by a warehouse distribution/logistics operator(s) for the storage of consumer goods. For analysis purposes, this EIR assumes that up to 25 percent of the building could be utilized for cold (refrigerated) storage. Hazardous materials storage is not expected to occur within the building or on the Project Site; however, small quantities of hazardous chemicals and/or materials – including but not limited to aerosols, cleaners, fertilizers, lubricants, paints or stains, fuels, propane, oils, and solvents – could be utilized during routine Project operations and maintenance.

The building is designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and the loading and unloading of tractor trailers at designated loading bays. The outdoor cargo handling equipment used during loading and unloading of trailers (e.g., yard trucks, hostlers, yard goats) is expected to be zero emission. As a practical matter, dock doors on warehouse buildings are not occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock door positions are frequently inactive throughout the day. For purposes of evaluation in this EIR, it is assumed that the Project would be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with San Bernardino County Development Code Section 83.07.030, which states that exterior lighting shall be energy-efficient, shielded, or recessed, and directed downward and away from adjoining properties.

For purposes of analysis in this EIR, employment estimates were calculated using the employment density factors identified in the Southern California Association of Governments (SCAG) *Employment Density Study* (October 2001), which identifies a rate of one (1) employee per 1,195 s.f. of building area for industrial warehouse uses. As such, the Project is estimated to create jobs for approximately 318 employees (380,579 s.f. ÷ 1,195 s.f./employee = 318.47 employees).

3.7 Summary of Requested Actions

San Bernardino County has primary approval responsibility for the proposed Project and serves as the Lead Agency for this EIR pursuant to CEQA Guidelines Section 15050. The County's Planning Commission is the decision-making authority for the Project and will consider the Project and make a decision to approve, approve

with changes, or deny the Project. The County will consider the information contained in this EIR and the Project's Administrative Record in its decision-making processes.

In the event of approval of the Project and certification of the EIR, the County will conduct administrative building reviews and grant ministerial permits and approvals for plans that conform to the plans approved by the Planning Commission in order to implement Project requirements and conditions of approval. In the event of substantial modifications to the plans approved by the Planning Commission, a Revision to Approved Action is required in accordance to the County's Development Code.

A list of the actions under County jurisdiction is provided in Table 3-3, *Project-Related Approvals/Permits*. Additional discretionary and/or administrative actions may be necessary from other government agencies to fully implement the Project. Table 3-3 lists the government agencies that are expected to use the Project's EIR during their consultation and review of the Project and its implementing actions and provides a summary of the subsequent actions associated with the Project.

Table 3-3 Project-Related Approvals/Permits

Public Agency	Approvals and Decisions
San Bernardino County	
Proposed Project – San Bernardino County Discretionary Approvals	
Planning Commission	• Approve, conditionally approve, or deny PROJ-2022-00012: o Conditional Use Permit, and o Lot Merger. • Certify or reject the Project's EIR along with appropriate CEQA Findings.
Subsequent San Bernardino County Discretionary and Ministerial Approvals	
Subsequent Implementing Approvals	• Approve Final Maps, parcel mergers, or parcel consolidations as may be appropriate. • Approve precise Site plan(s) and landscaping/irrigation plan (s), as may be appropriate. • Issue Grading Permits. • Issue Building Permits. • Approve Sewer Infrastructure Plans. • Issue Encroachment Permits. • Accept public right-of-way dedications. • Approve Water Quality Management Plan (WQMP).
Other Agencies –Approvals and Permits	
City of Redlands	• Approval of Memorandum of Understanding delegating discretionary approval authority for APN 0292-041-38 to San Bernardino County. • Issue Grading Permits for APN 0292-041-38. • Issue Building Permits for APN 0292-041-38.
Santa Ana Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit. • Approval of WQMP.

4.0 Environmental Analysis

4.0.1 Summary of EIR Scope

In accordance with CEQA Guidelines Sections 15126-15126.4, this EIR Section includes analyses of potential direct and indirect impacts that could occur from planning, constructing, and/or operating the proposed Project. CEQA Guidelines Section 15130 states that an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3).

The County distributed a NOP for this EIR to public agencies and interested individuals and posted the NOP on its website to solicit input on the scope of environmental study for the Project. Taking all known information and public comments into consideration, 12 primary environmental subject areas are evaluated in detail in Subsections 4.1 through 4.12, as listed below. Each Subsection evaluates several specific topics related to the primary environmental subject. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

4.1	Agriculture & Forestry Resources	4.7	Greenhouse Gas Emissions
4.2	Air Quality	4.8	Hazards & Hazardous Materials
4.3	Biological Resources	4.9	Hydrology & Water Quality
4.4	Cultural Resources	4.10	Noise
4.5	Energy	4.11	Transportation
4.6	Geology and Soils	4.12	Tribal Cultural Resources

After conducting preliminary research and in consideration of all comments received by the County on the scope of this EIR and documented in the County's administrative record, the County determined that the Project clearly has no potential to result in significant impacts to eight (8) environmental subjects: Aesthetics; Land Use & Planning; Mineral Resources; Population & Housing; Public Services; Recreation; Utilities & Service Systems; and Wildfire. These eight subject areas are addressed in EIR Section 5.0, *Other CEQA Considerations*.

4.0.2 Scope of Cumulative Effects Analysis

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a project. As noted in CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts" (CEQA Guidelines Section 15130(a)(1)). As defined in CEQA Guidelines Section 15355:

> *'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *(a) The individual effects may be changes resulting from a single project or a number of separate projects.*

> *(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

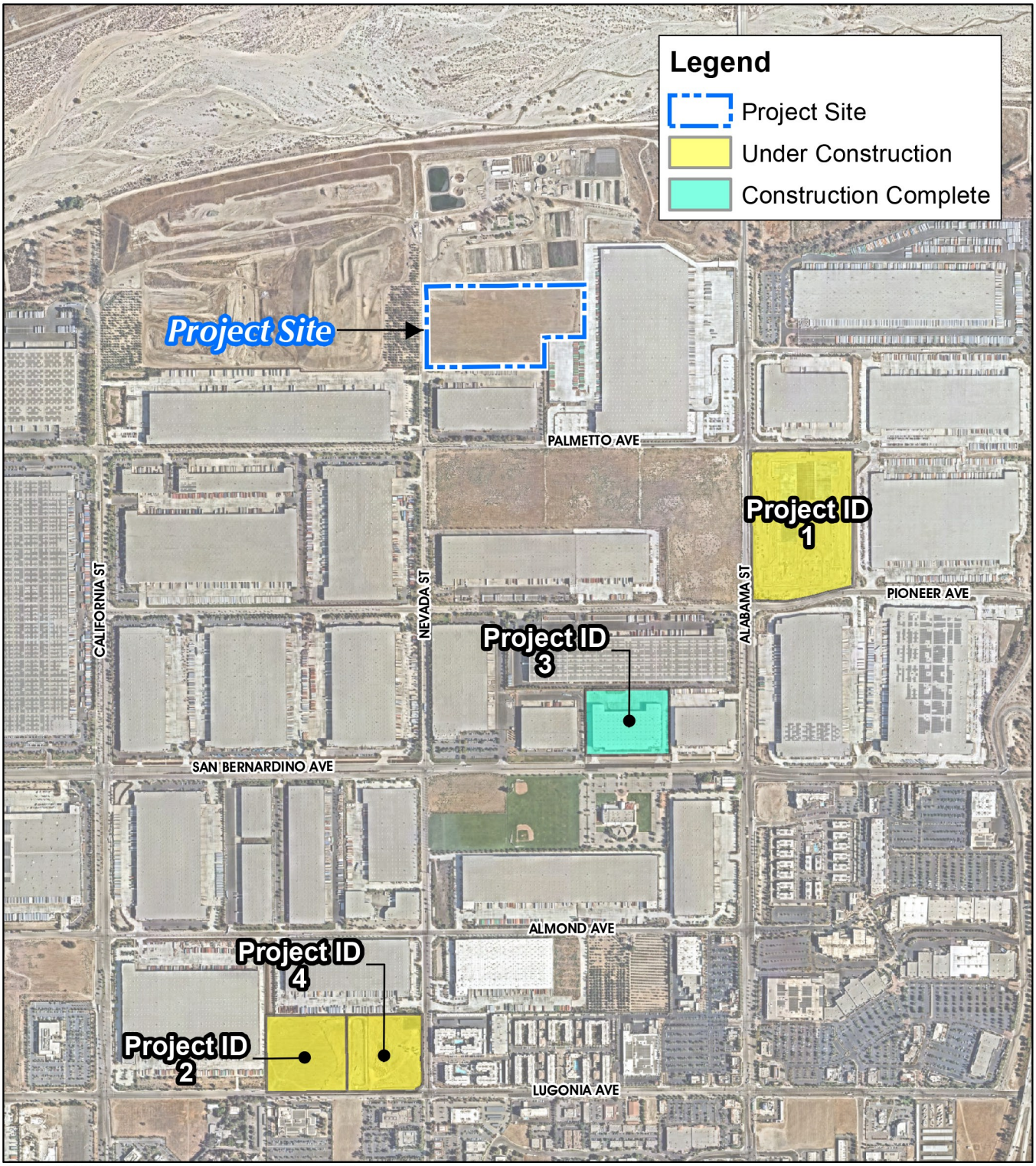
CEQA Guidelines Section 15130(b) describes two acceptable methods for identifying a study area for purposes of conducting a cumulative impact analysis. These two approaches include: "1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency ['the list of projects approach'], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact ['the summary of projections approach']."

This EIR utilizes an analysis approach that combines the summary of projections with the manual addition of past, present, and reasonably foreseeable projects ("combined approach"). The County determined the combined approach to be appropriate because while long-range planning documents contain a sufficient amount of information to enable an analysis of cumulative effect for all subject areas, relying solely on the summary of projections approach could underestimate localized cumulative effects in proximity to a development site or affected sensitive receptor(s). The list of projects used to supplement the summary of projections approach includes known approved and pending development projects in proximity to the Project Site, which includes the four (4) other past, present, and reasonably foreseeable projects in the vicinity of the Project Site. See Table 4.0-1, *Cumulative Development Land Use Summary*, and Figure 4.0-1, *Cumulative Development Location Map*.

Table 4.0-1 Cumulative Development Land Use Summary

Project ID	APN	Description	Status
1	0292-071-60	452,037 s.f. warehouse distribution facility	Under Construction
2	0292-053-08	282-unit multi-family residential development	Under Construction
3	0292-051-32	190,000 s.f. warehouse distribution facility	Construction Complete
4	0292-053-12	360–400-unit multi-family residential development	Under Construction

Source: (San Bernardino County, 2022)



Source(s): ESRI, Nearmap Imagery (2022), SB County (2021)

Figure 4.0-1

0 300 600 1,200 Feet

Cumulative Location Map

For the summary projections approach, the cumulative study area primarily includes the eastern San Bernardino Valley, including the cities of San Bernardino, Redlands, Loma Linda, and adjacent unincorporated communities, which exhibits similar characteristics as the Project area in terms of climate, geology, and hydrology. These areas are, therefore, likely to also have similar biological, archaeological, and tribal cultural resource characteristics as well. This study area also encompasses the service areas of the Project Site's primary public service and utility providers. Areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project Site to produce environmental effects that could be cumulatively considerable when considered together with the Project's impacts. Exceptions include the cumulative air quality analysis, which considers the entire South Coast Air Basin (SCAB); the greenhouse gas emissions and global climate change analysis, which considers global climate; and the analysis of potentially cumulative hydrology and water quality effects, which considers the area of the Santa Ana River Basin Watershed.

Environmental impacts associated with buildout of the Project's cumulative study area were evaluated in CEQA compliance documents prepared for the respective General Plans of each of the above-named jurisdictions. The location where each of these CEQA compliance documents is available for review is provided below. All of the CEQA compliance documents listed below are herein incorporated by reference pursuant to CEQA Guidelines Section 15150.

- San Bernardino Countywide Plan EIR, available for review at the San Bernardino County Land Use Services Department – Planning Division 385 North Arrowhead Avenue, 1st Floor, San Bernardino, California 92415;
- City of Redlands General Plan EIR, available for review at the City of Redlands Development Services Department, 35 Cajon St Suite 20, Redlands, Ca 92373;
- City of Loma Linda General Plan EIR, available for review at City of Loma Linda Community Development Department, 25541 Barton Road, Loma Linda, CA 92354; and
- City of San Bernardino General Plan EIR, available for review at City of San Bernardino Community & Economic Development Department, 290 North D Street, San Bernardino, CA 92401.

4.0.3 Analysis Format

Subsections 4.1 through 4.12 of this EIR evaluate the 12 environmental subjects warranting detailed analysis as determined by the County in consideration of preliminary research findings, public comments, and technical study. The format of discussion is standardized as much as possible in each section for ease of review. The environmental setting is discussed first and is followed by a discussion of the potential environmental impacts that would result from implementation of the Project (which is based on specified thresholds of significance used as criteria to determine whether potential environmental effects are significant).

The thresholds of significance used in this EIR are based on the thresholds presented in CEQA Guidelines Appendix G and as applied by the County. The thresholds are intended to assist the reader of this EIR in

understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

Serving as the CEQA Lead Agency for this EIR, the County is responsible for determining whether an adverse environmental effect identified in this EIR should be classified as significant or less than significant. The standards of significance used in this EIR are based on the independent judgment of the County, taking into consideration CEQA Guidelines Appendix G, the County's Countywide Plan, the County's Development Code and Code of Ordinances, adopted County policies, the judgment of the technical experts that prepared this EIR's Technical Appendices, performance standards adopted, implemented, and monitored by regulatory agencies, and significance standards recommended by regulatory agencies.

As required by CEQA Guidelines Section 15126.2(a), Project-related effects on the environment are characterized in this EIR as direct, indirect, cumulatively considerable, short-term, long-term, on-site, and/or off-site impacts. A summarized "impact statement" is provided in each subsection following the analysis. Each subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations) that the Project and its implementing actions are required to comply with (if any). If impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. For any impact identified as significant and unavoidable, the County would be required to adopt a statement of overriding considerations pursuant to CEQA Guidelines Section 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project that outweigh the unavoidable impacts, supported by substantial evidence in the Project's administrative record.

4.1 AGRICULTURE & FORESTRY RESOURCES

This Subsection describes agriculture and forestry resources present on the Project Site and in the Site's vicinity and evaluates the potential effect that the Project may have on these resources. All references used in this analysis are listed in EIR Section 7.0, *References.*

4.1.1 EXISTING CONDITIONS

A. Agriculture Resources

1. Regional and Local Setting

Agricultural operations in San Bernardino County produced approximately $420,251,000 of goods in 2020 (San Bernardino County AWM, 2021). The most valuable agricultural products produced in the County in 2020 were milk and milk products, cattle, calves and dairy cull, eggs, and replacement heifers, which accounted for approximately $253,000,000 of the total value of all agricultural products in the County (ibid.). Livestock and poultry operations are primarily centered in the "West End South" region, which includes the cities of Chino, Chino Hills, and Ontario; the "East End" region, which includes the Project Site, primarily produces fruits, nuts and vegetables that represent approximately 10 percent of the total value produced by the West End South region (San Bernardino County AWM, 2001).

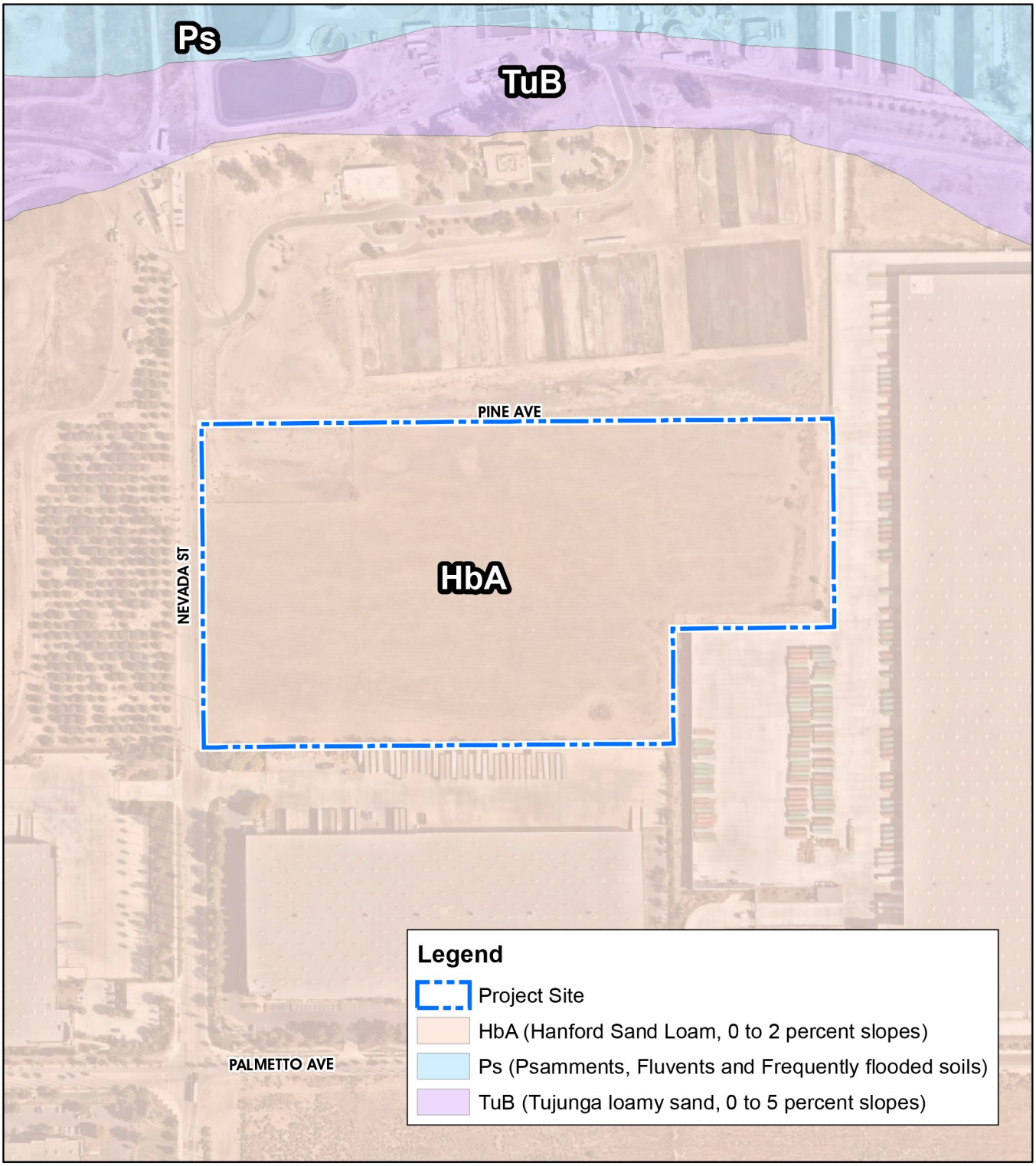
The Project Site is located in an area that has undergone extensive transition from agricultural land uses to urban development. Prior to 2005, almost all of an approximately five (5) square-mile area (approximately 1,200 acres) in the vicinity of the Project Site, located east of California Street, west of I-210, north of Lugonia Avenue, and south of the Santa Ana River, was under production as orchards or row crops (Google Earth, 2022). Today, almost all agricultural production within this area has ceased – with the exception of an approximately five (5)-acre citrus orchard located across the street from the Project Site (on the west side of Nevada Street).

Under existing conditions, the Project Site is vacant; however, historically, the Site was used for agricultural production. From at least 1930 to 1975, the Project Site was used as an orchard; the Site was vacant from 1975 to approximately 1985; and was used for row crop production between approximately 1989 to 2014 (V3, 2021, p. 1). Agricultural production on the Project Site ceased in 2014.

2. Soil Characteristics

A property's agricultural productivity potential is primarily determined by the quality of the site's soils. High-quality, productive soils have a higher likelihood to correspond with an important agricultural resource than do low-quality soils.

The Project Site is covered by Hanford sandy loam (HbA), as shown on Figure 4.1-1, *Soils Map*. The Hanford series consists of very deep, well drained soils that formed in moderately coarse textured alluvium dominantly from granite. Hanford soils are found on stream bottoms, floodplains and alluvial fans and have slopes of 0 to 15 percent; the slopes on the Project Site are 0 to 2 percent (USDA, 2022).



Source(s): ESRI, Nearmap Imagery (2022), Web Soil Survey (2021)

Figure 4.1-1

0 75 150 300 Feet

Soils Map

❑ Storie Index

The Storie Index is a rating system first developed by R. Earl Storie in 1933 that determines the value of farmland by evaluating the soil type on a given property. The Storie Index rating system ranks each soil according to four general factors: 1) the characteristics of the soil profile and its depth; 2) the texture of the surface soil; 3) the slope of the land on which the soil is located; and 4) other factors, including drainage, salt content, erosion, and alkali. A score ranging from 0 to 100 percent is determined for each factor, and the scores are then multiplied together to derive an index rating. Soils are graded according to their index on a scale of 1 through 6. (University of California, 1978, p. 1)

Soils of Grade 1 (excellent) rate between 80 and 100 percent and have few or no limitations that restrict their use for crops. Soils of Grade 2 (good) rate between 60 and 79 percent and have few special management needs and are suitable for most crops, but they have minor limitations that narrow the choice of crops. Grade 3 (fair) soils rate between 40 and 59 percent and are suited to a few crops or to special crops and require special management. Grade 4 (poor) soils rate between 20 and 39 percent and are severely limited for crops, and if used, it requires careful management. Grade 5 (very poor) soils rate between 10 and 19 percent and generally are not suited to cultivated crops but can be used for pasture and range. Grade 6 (nonagricultural) consists of soils and land types that rate less than 10 percent and generally are not suited to farming. (University of California, 1978, p. 3)

The soils on the Project Site are rated as Grade 1 and are assigned a numerical score of 81 (USDA, 2022). Accordingly, the Storie Index ranks the soils on the Project Site as "excellent" for agricultural production.

❑ Land Capability Classification

Similar to the Storie Index, the Land Capability Classification (LCC) is used to determine the soil's suitability for crop production. The LCC includes eight (8) classes identified as "I" through "VIII," with soils designated as "I" being the most suitable for crop production. Additionally, the LCC includes four subclasses to identify the soil's limitation, including susceptibility to erosion ("e") and limitations due to water ("w"), shallow/stony soils ("s"), or climate ("c"). (USDA, n.d.)

The soils on the Project Site are rated as "I" if irrigated and "IIIc" if non-irrigated (USDA, 2022). No irrigation system was observed during pedestrian surveys of the Project Site and no buried irrigation system has been encountered on the Project Site during routine disking activities (V3, 2021, pp. 14-16 & Appendix D; Snyder, 2022). Additionally, no water wells were observed on the Project Site and no wells are known to exist on the Project Site based on information provided by the property owner and historical research of the property (V3, 2021, p. 15 & Appendix D). Based on this evidence, this analysis assumes there is no irrigation system on the Project Site under existing conditions and, therefore, the Site is considered to have a LCC of "IIIc."

B. Forestry Resources

The Project Site is located in the County's valley region. According to the Countywide Plan EIR, all of the forest land in the County is located in the mountain and desert regions; therefore, there is no forest land on or in the vicinity of the Project Site (San Bernardino County, 2019, p. 5.2-5).

4.1.2 Regulatory Setting

The following is a brief description of environmental laws and related regulations applicable to agriculture and forestry resources and the Project and/or Project Site.

A. State Plans, Policies, and Regulations

1. California Land Conservation Act (CLCA)

The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act (CA Gov. Code Section 51200, et seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value.

Pursuant to Government Code Section 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts pursuant to the CLCA only are allowed for areas within established Agricultural Preserves. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. Once established, land uses within an Agricultural Preserve must be agricultural in nature, or other such uses that are not incompatible with agricultural uses. For parcels within Agricultural Preserves, individual land owners may enter into a Contract with a county or city that would provide for the exclusion of uses other than agriculture, and other than those compatible with agriculture uses, for the duration of the Contract, even if the land is sold to a new owner. In return for entering into a Contract, the landowner is granted preferential property taxes that are based upon agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the nonrenewal process. Under the nonrenewal process, the remaining contract term (typically nine years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual property tax assessment increases slightly each year until it is equivalent to the full tax rate (based on market value) at the end of the nonrenewal period. Under a set of specifically defined circumstances, a Contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process and the payment of a fee by the landowner equal to 12.5 percent of the full market value of the property in question.

The Countywide Plan EIR does not identify any active Williamson Act contracts on the Project Site or in the vicinity of the Site (San Bernardino County, 2019, Figure 5.2-1).

2. Farmland Mapping and Monitoring Program

The goal of the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) is to provide consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. To meet this goal, FMMP's objective is to provide maps and statistical data to the public, academia, and local, state, and federal governments to assist them in

making informed decisions for the best utilization of California's farmland. The FMMP was established in 1982 in response to what was by then a critical need for data on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State. Government Code Section 65570 mandates FMMP to biennially report to the Legislature on the conversion of farmland and grazing land, and to provide maps and data to local government and the public. The FMMP also was directed to prepare and maintain an automated map and database system to record and report changes in the use of agricultural lands. It was the intent of the Legislature and a broad coalition of building, business, government, and conservation interests that FMMP be non-regulatory, and provide a consistent and impartial analysis of agricultural land use and change in California. With this in mind, FMMP provides basic data from which observations and analyses can be made in the land use planning process.

Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is generally 10 acres, except as otherwise noted. Provided below is a description of the various map categories established by the FMMP (CDC, 2004, p. 6):

- **Prime Farmland (P)**: Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Farmland of Statewide Importance (S)**: Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Unique Farmland (U)**: Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

- **Farmland of Local Importance (L)**: Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.

- **Grazing Land (G)**: Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.

- **Urban and Built-Up Land (D)**: Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- **Other Land (X)**: Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water

bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Figure 4.1-2, *FMMP Farmlands Map*, illustrates the FMMP classifications for the Project Site; as shown, the entire Project Site is classified as "Prime Farmland."

B. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Natural Resources Element of the Countywide Plan sets forth goals and policies related to the protection of agricultural resources and existing agricultural land uses. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Goal NR-7: Agriculture and Soils. The ability of property owners, farmers, and ranchers to conduct sustainable and economically viable agricultural operations.

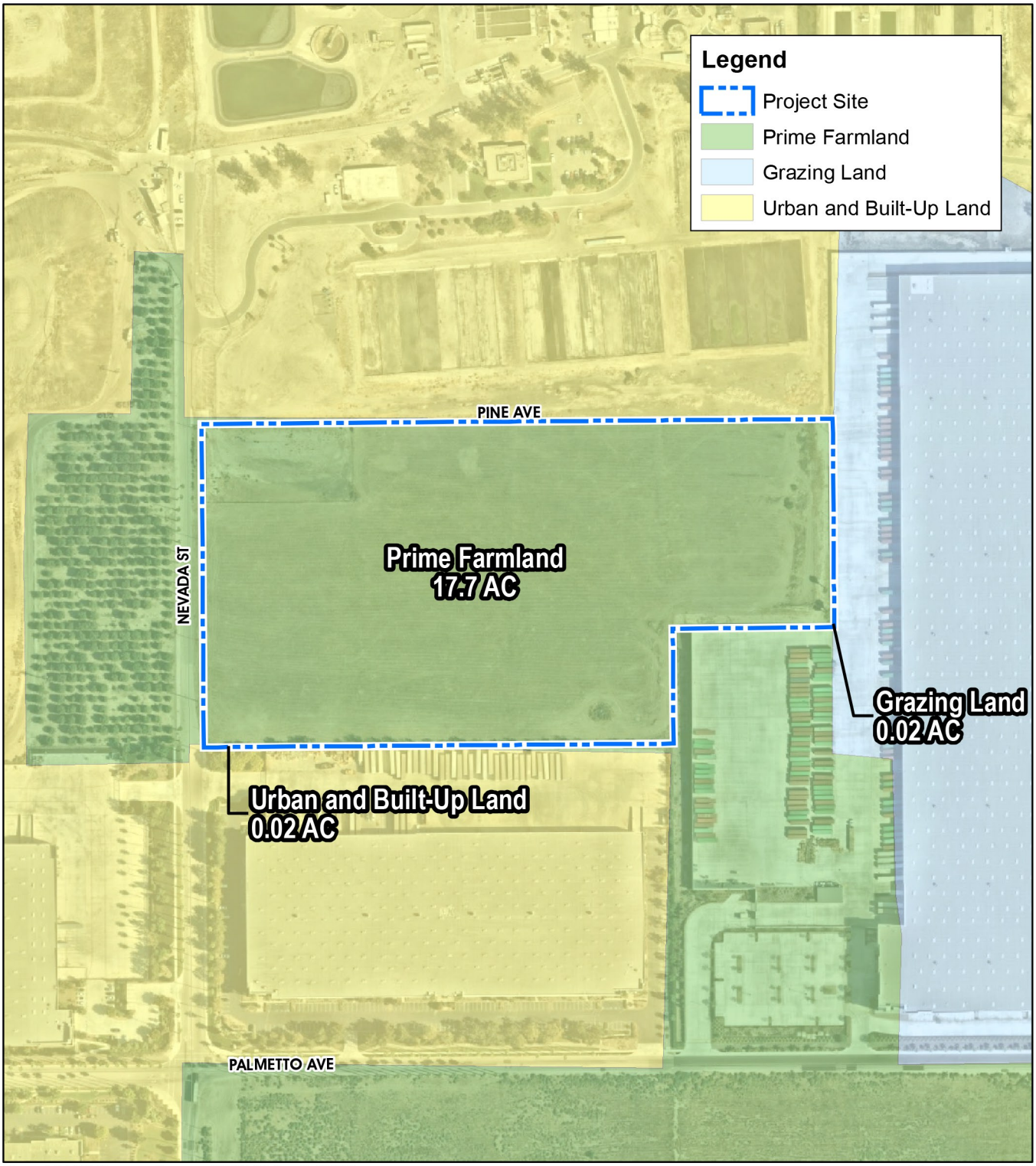
Policy NR-7.1: Protection of agricultural land. We protect economically viable and productive agricultural lands from the adverse effects of urban encroachment, particularly increased erosion and sedimentation, trespass, and non-agricultural land development.

Policy NR-7.2. Preservation of important farmlands. We require project applicants seeking to develop 20 or more acres of farmland (classified as prime, of statewide importance, or unique farmland) to non-agricultural uses to prepare an agricultural resource evaluation prior to project approval. The evaluation shall use generally accepted methodologies to identify the potentially significant impact of the loss of agricultural land as well as the economic viability and sustainability of future agricultural use of the property, including long-term sustainability and economic viability of water resources. If the conversion is deemed significant, the County shall require mitigation at a 1:1 ratio of converted to preserved acreage through conservation easements, payment of its valuation equivalent if a fee mitigation program is established, or inclusion in a regional agricultural preservation program.

Policy NR-7.3. Conservation and preservation incentives. We support programs and policies that provide tax and economic incentives to conserve existing productive agricultural lands or preserve farmland classified as prime, of statewide importance, unique, or of local importance. We support land owners in establishing new and maintaining existing California Land Conservation (Williamson Act) contracts.

Policy NR-7.4. Economic diversity of farm operations. We encourage farm operations to strengthen their economic viability through diversifying potential sources of farm income and activity, including value added products, agricultural tourism, roadside stands, organic farming, and farmers markets.

Policy NR-7.5. Agriculture on Rural Living and Open Space properties. We permit small-scale, non-water-intensive, and incidental agricultural on properties designated for Rural Living. In the Oak Glen and Mentone community planning areas, we also permit commercial-scale agriculture on properties designated for Rural Living. In the Oak Glen and Mentone community planning areas and in the Crafton Hills, we also permit commercial-scale agriculture on privately owned properties designated for Open Space.



Source(s): ESRI, Nearmap Imagery (2022), SB County (2016)

Figure 4.1-2

0 75 150 300 Feet

FMMP Farmlands Map

4.1.3 Basis for Determining Significance

The threshold listed below are taken from Appendix G to the CEQA Guidelines and address the typical, adverse effects that development projects could have on agriculture and/or forestry resources. The proposed Project would result in a significant impact if the Project or any Project-related component would:

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

b. *Conflict with existing zoning for agricultural use, or a Williamson contract;*

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

d. *Result in the loss of forest land or conversion of forest land to non-forest use; or*

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.*

4.1.4 Methodology for Evaluating Impacts

The analysis of potential impacts to agriculture and forestry resources is based upon a site reconnaissance and review of published reports, maps, and aerial photographs. In addition, the Countywide Plan and its EIR and information sources from State agencies were researched to establish the Project Site's existing conditions and likelihood of environmental effects.

Of particular note, the California Land Evaluation and Site Assessment (LESA) Model was used as an evaluation tool to determine if the subject property qualifies as an important agricultural resource. The LESA Model is a point-based approach that uses measurable factors to quantify the relative value of agricultural land resources and assist in the determination of the significance of agricultural land conversions. Many states have developed LESA Models specific to their local contexts. The California LESA Model was created as a result of Senate Bill 850 (Chapter 812/1993), and provides lead agencies with an optional methodology to ensure that potentially significant effects on the environment associated with agricultural land conversions are quantitatively and consistently considered in the environmental review process. The LESA Model analysis performed for the Project was prepared following the direction provided in the *California Agricultural Land Evaluation and Site Assessment Instruction Manual* (1997) prepared by the California Department of Conservation.

4.1.5 IMPACT ANALYSIS

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

The entire Project Site – approximately 17.7 acres – is designated as "Prime Farmland" by the FMMP. Accordingly, implementation of the Project would convert Farmland to a non-agricultural use. The Project Site was evaluated using the California LESA Model to quantify its relative agricultural value and determine whether to loss of the Farmland on the Project Site represents a significant environmental impact.

The California LESA Model considers two (2) Land Evaluation factors and four (4) Site Assessment factors in its agricultural value scoring. The Land Evaluation factors include the LCC and the California Storie Index. The Site Assessment factors include the size of the project site, water availability, nearby agriculture land, and nearby protected resource land. The Land Evaluation factors account for half of the total LESA Model score, with the LCC and Storie Index ratings carrying equal weight. The Site Assessment factors also account for half of the total LESA Model Score, with all factors carrying equal weight with the exception of nearby protected resource land which has the lowest value.

As noted previously in this Subsection, the Project Site has a LCC of "IIIc." The *California Agricultural Land Evaluation and Site Assessment Instruction Manual* does not assign a point rating to the LCC "IIIc" soils (CDC, 1997, p. 10). Based on direction provided to T&B Planning from California Department of Conservation Staff, LCC "IIIc" soils should be assigned 60 points by the California LESA Model (Kisko, 2014). Accordingly, the Project Site's LCC rating score under the California LESA Model is 60.

As also noted previously in this Subsection, the soils on the Project Site are rated as "Excellent" by the California Storie Index and has a point rating of 81. Accordingly, the Project Site's Storie Index rating score under the California LESA Model is 81.

The project size rating is based on the total acreage of soils with LCC classifications on a subject property, with higher rating scores assigned to higher quality soils (e.g., LCC class I and II) and lower rating scores assigned to lower quality soils (e.g., LCC class IV and lower). The Project Site contains approximately 17.7 acres of LCC class III soils, which equates to a rating score of 10 under the California LESA Model (CDC, 1997, p. 14).

The water resources availability rating is based on the availability and reliability of irrigation water and rainfall to a project site under normal and dry year conditions. Sites where irrigation is feasible under normal and dry conditions are rated higher than sites where irrigation is infeasible or average rainfall is insufficient to support dryland farming. The Project Site does not contain an irrigation system under existing conditions; therefore, the California LESA Model considers irrigation to the Site to be infeasible (CDC, 1997, p. 18). Under normal conditions, the Project area receives approximately 13.6 inches of rain per year (WRCC, n.d.). During recent periods of drought (i.e., 2012-2016 rain seasons), the Project area received an average of 8.9 inches of rain per year (USCD, n.d.). Dryland farming can be productive with as little as 10-12 inches of rain per year (CAWSI,

n.d.). Accordingly, dryland farming is considered feasible at the Project Site during normal years but not feasible during drought years, which corresponds to a water resources availability rating score of 20 under the California LESA Model (CDC, 1997, p. 14).

The surrounding agricultural land score is affected by the presence or absence of land under active agricultural production within a project site's zone of influence (ZOI). The ZOI is established following the procedures outlined in the *California Agricultural Land Evaluation and Site Assessment Instruction Manual* and generally includes all parcels within one-quarter mile of a project site. Based on a review of current aerial photography, approximately 4.9 acres of the Project Site's ZOI – or about one (1) percent – is under agricultural production (see Figure 4.1-3, *Surrounding Agricultural Land*). Under the California LESA Model, the Project Site's surrounding agricultural land score is zero (0) (CDC, 1997, p. 25).

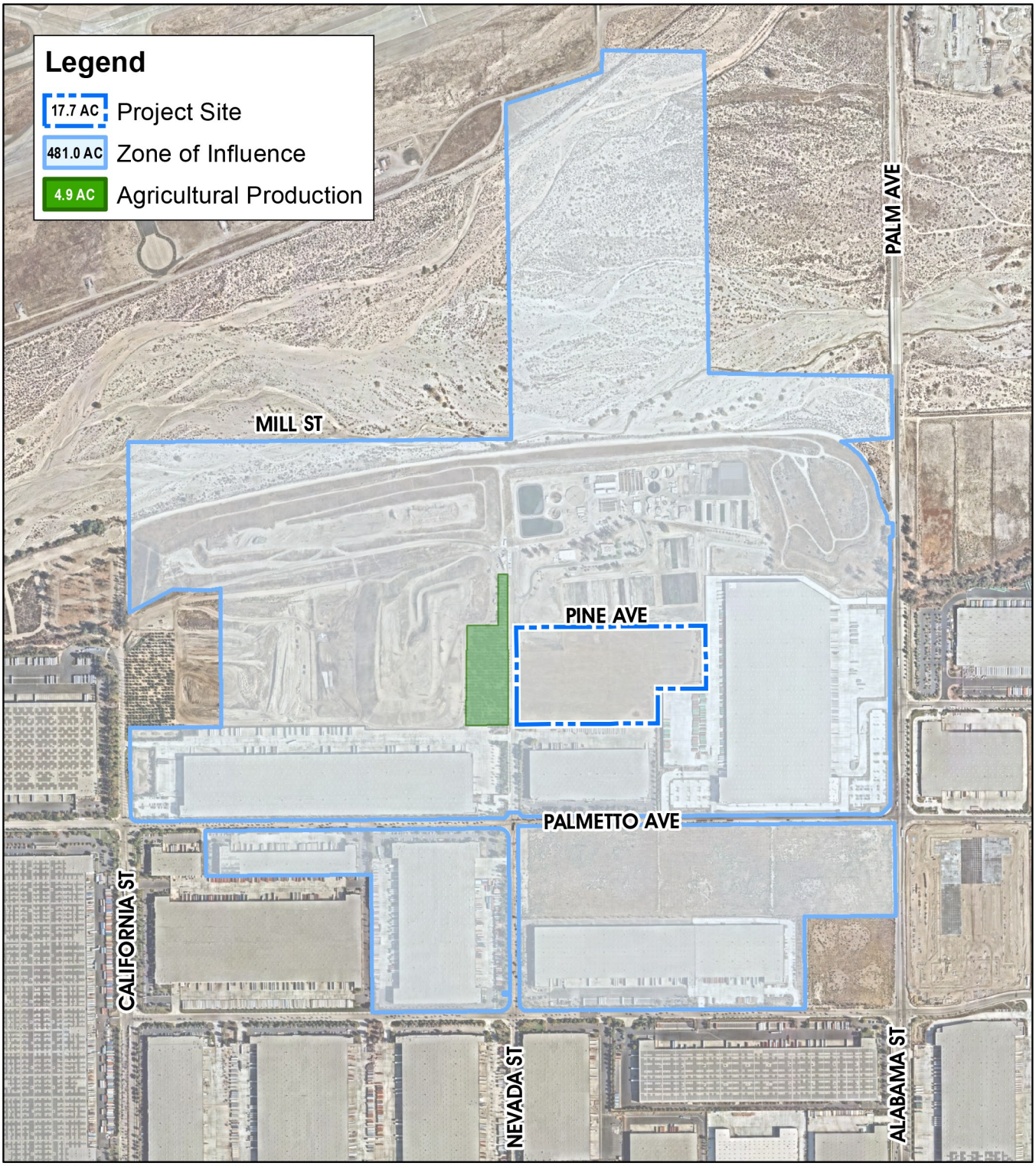
The surrounding protected resource land is affected by the presence or absence of lands within a project's ZOI that have long-term development restrictions that make them are compatible with or supportive of agricultural uses. Figure 4.1-4, *Surrounding Protected Resource Land*, illustrates the protected resource lands in the Project Site's ZOI. Approximately 125.4 acres within the Project Site's ZOI meets the LESA definition of protected resource land, which corresponds to approximately 26 percent of the ZOI area. Under the California LESA Model, the Project Site's surrounding protected resource land score is 10 (CDC, 1997, p. 28).

Using the scores described above and the factor weights applied by the California LESA Model, the Project Site's numerical agricultural value score was calculated. As summarized in Table 4.1-1, *LESA Score Summary*, the Project Site receives a California LESA Model score of 40.25, with a Land Evaluation factor sub-score of 35.25 and a Site Assessment factor sub-score of 5.00.

Table 4.1-1 LESA Score Summary

	Factor Score	Factor Weight[1]	Weighted Factor Scores
Land Evaluation Factors			
LCC	60.0	0.25	15.00
Storie Index	81.0	0.25	20.25
		LE Subtotal	*35.25*
Site Assessment Factors			
Project Size	10	0.15	1.50
Water Resource Availability	20	0.15	3.00
Surrounding Agricultural Land	0	0.15	0.00
Protected Resource Land	10	0.05	0.50
		SA Subtotal	*5.00*
Final LESA Score			**40.25**

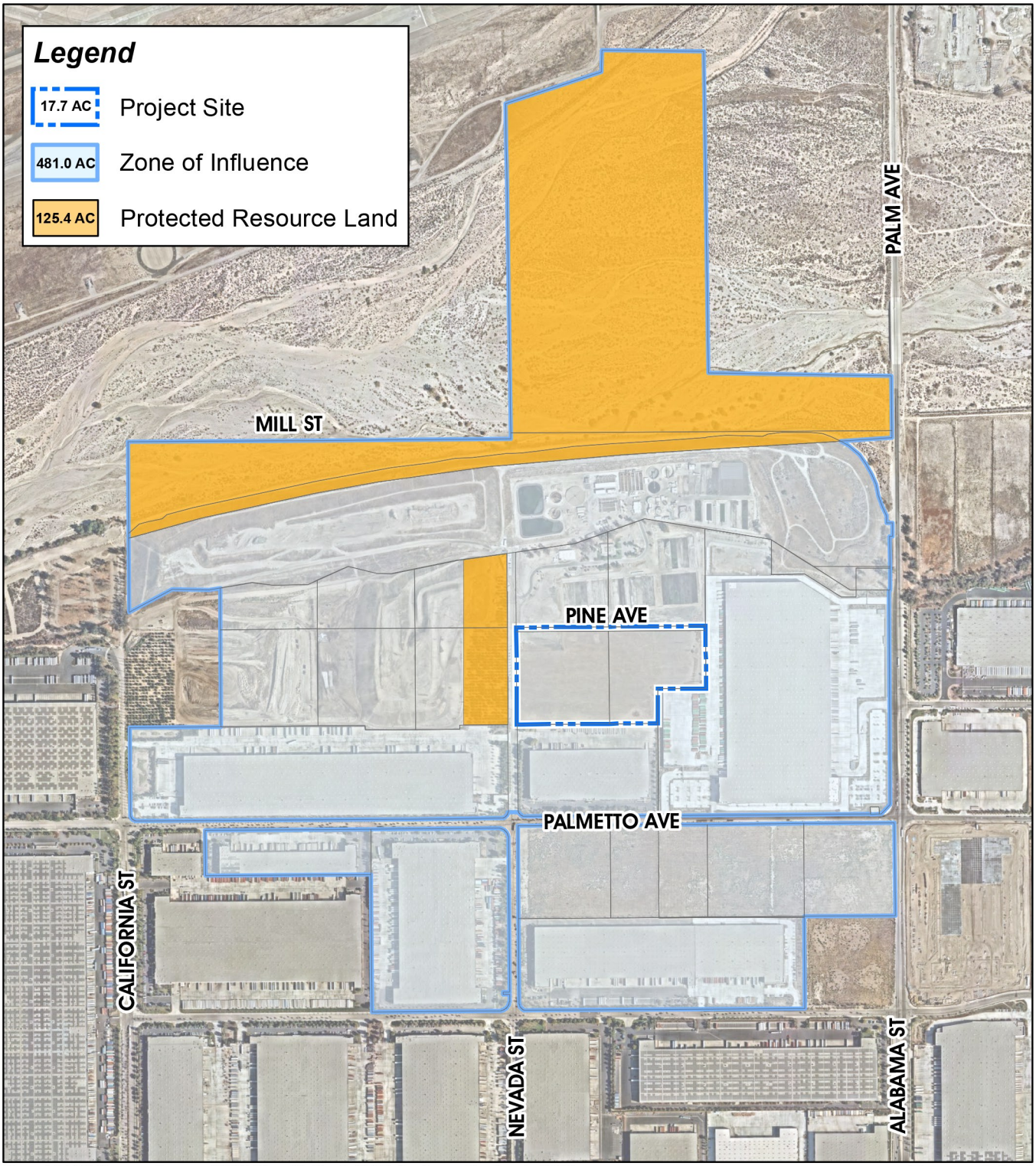
[1]Per *California Agricultural Land Evaluation and Site Assessment Instruction Manual* (1997).



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

Figure 4.1-3

Surrounding Agricultural Land



Source(s): ESRI, Nearmap Imagery (2022), City of Redlands (2017), San Bernardino County (2019)

Figure 4.1-4

0 250 500 1,000 Feet

Surrounding Protected Resource Land

Pursuant to the California LESA Model scoring system, a final LESA score between 40 and 59 points corresponds to an important agricultural resource only when both the Land Evaluation and Site Assessment factor sub-scores are greater than or equal to 20 (CDC, 1997, p. 31). Because the Project Site's LESA Site Assessment factor sub-score is not greater than or equal to 20, the Project Site is not considered to be an important agricultural resource. Thus, the Project Site is considered to have a relatively low value for agricultural production and the loss of Farmland on the Site would result in a less than significant impact to the environment.

Threshold "b"	***Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

The Project Site is zoned for industrial land uses and is not included within an existing zone or overlay zone for agricultural use. In addition, based on information disclosed in the Countywide Plan EIR, the Project Site is not subject to a Williamson Act contract (San Bernardino County, 2019, Figure 5.2-1). Accordingly, implementation of the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

Threshold "c"	***Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))***
Threshold "d"	***Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

The Project Site is zoned for industrial land uses and is not included within an existing zone or overlay zone for forestland, timberland, or timberland production. In addition, based on information disclosed in the Countywide Plan EIR, there are no forest land located on or in the vicinity of the Project Site (San Bernardino County, 2019, p. 5.2-5). Accordingly, implementation of the Project would neither conflict with existing zoning for forest land, timberland, or timberland production nor result in the loss or conversion of forest land. No impact would occur.

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

As disclosed under the analysis for Threshold "a," implementation of the Project would result in the loss of availability of land classified as Farmland (specifically, "Prime Farmland") but the loss of Farmland on the Site would not be considered a significant environmental impact due to the relatively low agricultural value of the Project Site. The Project would not involve any other changes to Farmland that was not previously addressed by the response to Threshold "a." Impacts related to the loss of Farmland would be less than significant.

As disclosed above under the analysis for Thresholds "c" and "d," implementation of the Project would not involve changes in the existing environment that would result in conversion of forest land to non-forest land. No impact would occur.

4.1.6 Cumulative Impact Analysis

San Bernardino County has historically been used for agricultural production (dairy/livestock, row and field crops, orchards, etc.); however, agriculture has experienced a decline over the past two decades. According to reports compiled by the County, approximately 1.7 million acres in the County have fallen out of agricultural production since the year 2000 and the value of agricultural goods produced in the County has fallen by approximately $200,000,000 over that same time period (San Bernardino County AWM, 2001; San Bernardino County AWM, 2021). The economic challenges facing the agriculture industry in the Inland Empire area also are well documented in a report titled *Assessing the Economic and Market Trends Affecting Agriculture in the Western Inland Empire*, prepared by Chang & Adams Consulting (Chang, 2011). The economic challenges facing the agriculture industry in the Inland Empire area also are well documented in a report titled *Assessing the Economic and Market Trends Affecting Agriculture in the Western Inland Empire*, prepared by Chang & Adams Consulting (Chang, 2011).

The Project Site is at the tail end of a transition from cropland and orchard land uses to non-agricultural, employment-generating land uses. Under existing conditions, the Project Site is vacant and has not been used for agricultural land uses in eight (8) years. Property to the west, south, and east of the Project Site all were under agricultural production through the early 21st century but, today, these properties are occupied by large-scale industrial/warehouse buildings and municipal services (landfill and water treatment facility) (Google Earth, 2022).

Although implementation of the Project would result in the development of non-agricultural land uses on land designated as "Prime Farmland," the Project Site is not considered to be a valuable agricultural resource under the California LESA Model, has not been used for agricultural production for many years, and is planned for industrial land uses by the Countywide Plan (and was planned for industrial land uses by the prior County General Plan, too). Accordingly, proposed development activities on the Project Site would not result in an unanticipated or cumulatively considerable adverse effect to existing local agriculture.

Additionally, there are no forest lands, timberlands, or Timberland Production zones on or near the Project Site, nor are any nearby lands under active production as forest land. Therefore, cumulatively considerable impacts to forest land would not occur as the Project would have no direct or indirect effect for these resources.

4.1.7 Significance of Impacts Before Mitigation

Threshold "a:" Less than Significant Impact. The Project Site contains lands designated as "Prime Farmland" by the FMMP, but the Site is not considered to be an important agricultural resource under the California LESA Model and is not under agricultural production under existing conditions. Thus, the loss of Prime Farmland on the Project Site would not result in a significant effect on the environment.

Threshold "b:" No Impact. The Project Site is not zoned for an agricultural use and is not subject to a Williamson Act contract.

Threshold "c:" No Impact. The Project Site is not zoned for forest land; therefore, implementation of the Project would not conflict with any zoning for forest land resources.

Threshold "d:" No Impact. There are no forest lands, timberland, or Timberland Production-zoned land on the Project Site; therefore, implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use.

Threshold "e:" Less than Significant Impact. Implementation of the Project would not involve other changes to the existing environment, which, due to their location or nature, could result in conversion of off-site Farmland to non-agricultural use or conversion of forest land to non-forest use.

4.1.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.2 AIR QUALITY

This Subsection is based primarily on two technical studies that were prepared by Urban Crossroads, Inc. to evaluate the potential for Project-related construction and operational activities to result in adverse effects on local and regional air quality. The first report, an air quality impact analysis (AQIA), is titled "Nevada Street Warehouse Air Quality Impact Analysis," dated May 24, 2022, and is included as *Technical Appendix B* to this EIR (Urban Crossroads, 2022a). The second report, a mobile source health risk assessment (HRA), is titled "Nevada Street Warehouse Mobile Source Diesel Health Risk Assessment," dated August 24, 2022, and is included as *Technical Appendix C* to this EIR (Urban Crossroads, 2022b). All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.2.1 EXISTING CONDITIONS

A. Atmospheric Setting

The Project Site is located in the South Coast Air Basin (SCAB, or "Basin"), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB encompasses approximately 6,745 square miles and includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and the San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south.

B. Regional Climate

The regional climate – temperature, wind, humidity, precipitation, and the amount of sunshine – has a substantial influence on air quality. The SCAB's distinctive climate is determined by its terrain and geographical location, which comprises a coastal plain connected to broad valleys and low hills bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. The SCAB is semi-arid, with average annual temperatures varying from the low-to-middle 60s, measured in degrees Fahrenheit (F); however, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of the SCAB's climate. Humidity restricts visibility in the SCAB and the relative high humidity heightens the conversion of sulfur dioxide (SO_2) to sulfates (SO_4). The marine layer provides an environment for that conversion process, especially during the spring and summer months. Inland areas of the SCAB, including where the Project Site is located, show more variability in annual minimum/maximum temperatures and lower average humidity than coastal areas within the SCAB due to decreased marine influence.

More than 90 percent of the SCAB's rainfall occurs between November and April. The annual average rainfall within the SCAB varies between approximately nine (9) inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB. Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB; the remaining one-quarter is absorbed by clouds. The abundant amount of sunshine (and its associated ultraviolet radiation) is a key factor to the photochemical reactions of air pollutants in the SCAB.

Dominant airflow direction and speed are the driving mechanisms for transport and dispersion of air pollution. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with storms moving through the region from the northwest. This period also brings five to 10 periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. During the nighttime, heavy, cool air descends mountain slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean.

In the SCAB, there are two distinct temperature inversion structures that control the vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level. A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides and carbon monoxide, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

The discussion above summarizes information from the Project's AQIA. Refer to Sections 2.2 and 2.3 of the Project's AQIA (*Technical Appendix B*) for a detailed description of regional climate and wind patterns.

C. Criteria Pollutants and Associated Human Health Effects

The federal government and State of California have established maximum permissible concentrations for common air pollutants that may pose a risk to human health or would otherwise degrade air quality and adversely affect the environment. These regulated air pollutants are referred to as "criteria pollutants." An overview of the common criteria air pollutants in the SCAB, their sources, and associated effects to human health are summarized on the following pages (refer also to Section 2.4 of the Project's AQIA for a detailed discussion of criteria pollutants).

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest in the winter during the morning, when there is little to no wind and surface-based inversions trap the pollutant at ground levels. CO is emitted directly from internal combustion engines; therefore, motor vehicles operating at slow speeds are the primary source of CO and the highest ambient CO concentrations in the SCAB are generally found near congested transportation corridors and intersections. Inhaled CO does not directly affect the lungs but affects tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Therefore, health conditions with

an increased demand for oxygen supply can be adversely affected by exposure to CO. The most common symptoms associated with CO exposure include headache, nausea, vomiting, dizziness, fatigue, and muscle weakness. Individuals most at risk to the effects of CO include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic oxygen deficiency.

- **Sulfur Dioxide (SO_2)** is a colorless gas or liquid. SO_2 enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_X). SO_2 is a respiratory irritant to people afflicted with asthma. After a few minutes' exposure to low levels of SO_2, asthma sufferers can experience breathing difficulties, including airway constriction and reduction in breathing capacity. Although healthy individuals do not exhibit similar acute breathing difficulties in response to SO_2 exposure at low levels, animal studies suggest that very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

- **Nitrogen Oxides (NO_X)** consist of nitric oxide (NO), nitrogen dioxide (NO_2) and nitrous oxide (N_2O) and are formed when nitrogen (N_2) combines with oxygen (O_2). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere, and reduced visibility. Of the nitrogen oxide compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitoring stations. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2. Short-term exposure to NO_2 can result in resistance to air flow and airway contraction in healthy subjects. Exposure to NO_2 can result decreases in lung functions in individuals with asthma or chronic obstructive pulmonary diseases (e.g., chronic bronchitis, emphysema), as these individuals are more susceptible to the effects of NO_X than healthy individuals.

- **Ozone (O_3)** is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, warm temperatures, and light wind conditions are favorable to the formation of this pollutant. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children, and people with pre-existing lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for ozone effects. Children who participate in multiple outdoor sports and live in communities with high ozone levels have been found to have an increased risk for asthma.

- **Particulate Matter less than 10 microns (PM_{10}) and less than 2.5 microns ($PM_{2.5}$)** are air pollutants consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols that are 10 microns or smaller or 2.5 microns or smaller, respectively. These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO_2 release from power plants and industrial facilities, and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles is highly dependent on location, time of year, and weather conditions. The small size of PM_{10} and $PM_{2.5}$ allows them to enter the lungs where they may be deposited, resulting in adverse health effects. Elevated ambient concentrations of fine particulate matter (PM_{10} and $PM_{2.5}$) have been linked to an increase in respiratory infections, number, and severity of asthma attacks, and increased hospital admissions. Some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children, appear to be the most susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$.

- **Volatile Organic Compounds (VOCs)** and **Reactive Organic Gasses (ROGs)** are a family of hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. Both VOCs and ROGs are precursors to ozone and contribute to the formation of smog through atmospheric photochemical reactions. Individual VOCs and ROGs have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, including such common VOCs as gasoline, alcohol, and the solvents used in paints. Odors generated by VOCs can irritate the eye, nose, and throat, which can reduce respiratory volume. In addition, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system.

- **Lead (Pb)** is a heavy metal that is highly persistent in the environment. Historically, the primary source of lead air pollution was emissions from vehicles burning leaded gasoline. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with elevated blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death. Fetuses, infants, and children are most sensitive to the adverse effects of lead exposure.

D. Existing Air Quality

Air quality is evaluated under the context of ambient air quality standards published by the federal and State governments. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect are detailed in Table 4.2-1, *Ambient Air Quality Standards*.

Table 4.2-1 Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12.0 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m³)		9 ppm (10 mg/m³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)		0.053 ppm (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m³)	
	24 Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)[10]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[10]	—	
Lead[12,13]	30 Day Average	1.5 µg/m³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m³ (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m³		
Visibility Reducing Particles[14]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Source: (Urban Crossroads, 2022a, Table 2-2)

Table 4.2-1 Ambient Air Quality Standards (2 of 2)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: (Urban Crossroads, 2022a, Table 2-2)

1. Regional Air Quality

❑ Criteria Pollutants

The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and five (5) single-pollutant source Pb air monitoring sites throughout the Basin. The attainment status for criteria pollutants within the SCAB is summarized in Table 4.2-2, *Attainment Status of Criteria Pollutants in the SCAB*.

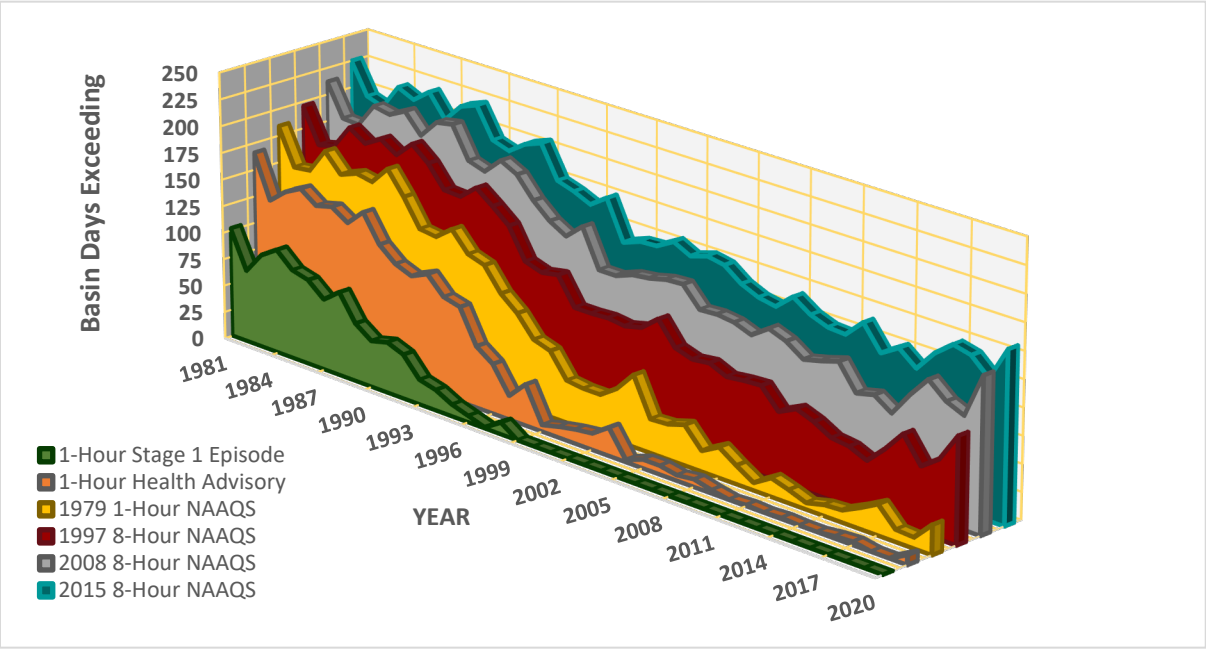
Table 4.2-2 Attainment Status of Criteria Pollutants in the SCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

Note: See Appendix 2.1 from the Project's AQIA for a detailed map of State/National Area Designations within the SCAB
"-" = The national 1-hour O_3 standard was revoked effective June 15, 2005.
[1] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.
Source: (Urban Crossroads, 2022a, Table 2-3)

The SCAB has been one of the most unhealthful air basins in the United States and has experienced unhealthful air quality since World War II. However, as a result of the region's air pollution control efforts over the last 60+ years, criteria pollutant concentrations in the SCAB have reduced dramatically and are expected to continue to improve in the future as State regulations become more stringent (Urban Crossroads, 2022a, pp. 26-36). Emissions of O_3, NO_X, VOC, and CO have been decreasing in the SCAB since 1975 and are projected to continue to decrease. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Although vehicle miles traveled (VMT) in the SCAB continue to increase, NO_X and VOC levels are decreasing because of federal and State mandated controls on motor vehicles and the replacement of older polluting vehicles with lower-emitting vehicles. NO_X emissions from electric utilities have also decreased due to use of cleaner fuels and renewable energy. O_3 contour maps show that the number of days exceeding the 8-hour NAAQS decreased between 1997 and 2007. Of note, due to higher temperatures and stagnant weather conditions, O_3 levels have increased in the past two years within the SCAB; however, O_3 levels in the SCAB have decreased substantially over the last 30 years with the current maximum measured concentrations being approximately one-third of concentrations experienced in the late 1970s, as illustrated on Figure 4.2-1, *SCAB Ozone Trend.*

Figure 4.2-1 SCAB Ozone Trend



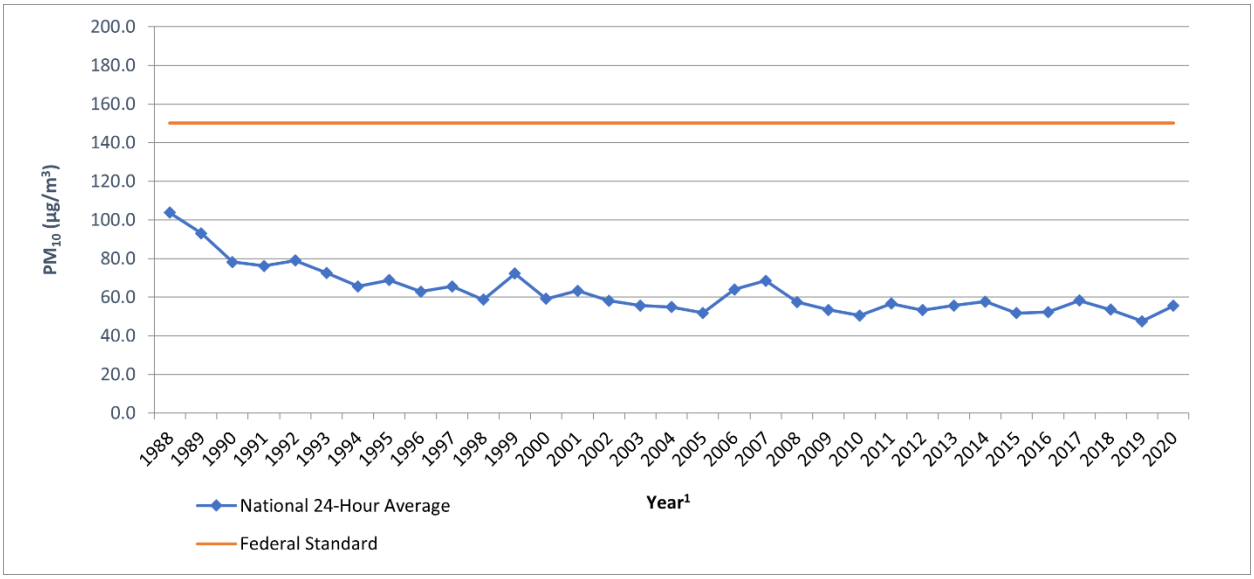
Source: (Urban Crossroads, 2022a, Table 2-5)

The most recent PM_{10} statistics also show an overall improvement within the SCAB as illustrated in Figure 4.2-2, *SCAB PM_{10} Trend (Federal Standard)*, and Figure 4.2-3, *SCAB PM_{10} Trend (Based on State Standard)*. During the period for which data are available, the 24-hour annual average concentration for PM_{10} decreased by approximately 46 percent against the federal standard, from 103.7 microgram per cubic meter (µg/m³) in 1988 to 55.5 µg/m³ in 2020 (Urban Crossroads, 2022a, p. 28). The 24-hour annual average for emissions for PM_{10} have decreased by approximately 64 percent against the State standards, from 93.9 µg/m³ in 1989 to 33.9 µg/m³ in 2020 (ibid.).

Figure 4.2-4, *SCAB $PM_{2.5}$ Trend (Federal Standard)*, and Figure 4.2-5, *SCAB $PM_{2.5}$ Trend (State Standard)*, shows the most recent 24-hour average $PM_{2.5}$ concentrations in the SCAB from 1999 through 2020. Overall, the national and State annual average concentrations have decreased by almost 50 percent and 31 percent, respectively (Urban Crossroads, 2022a, p. 29). It should be noted that the SCAB is currently designated as nonattainment for the State and federal $PM_{2.5}$ standards (ibid.).

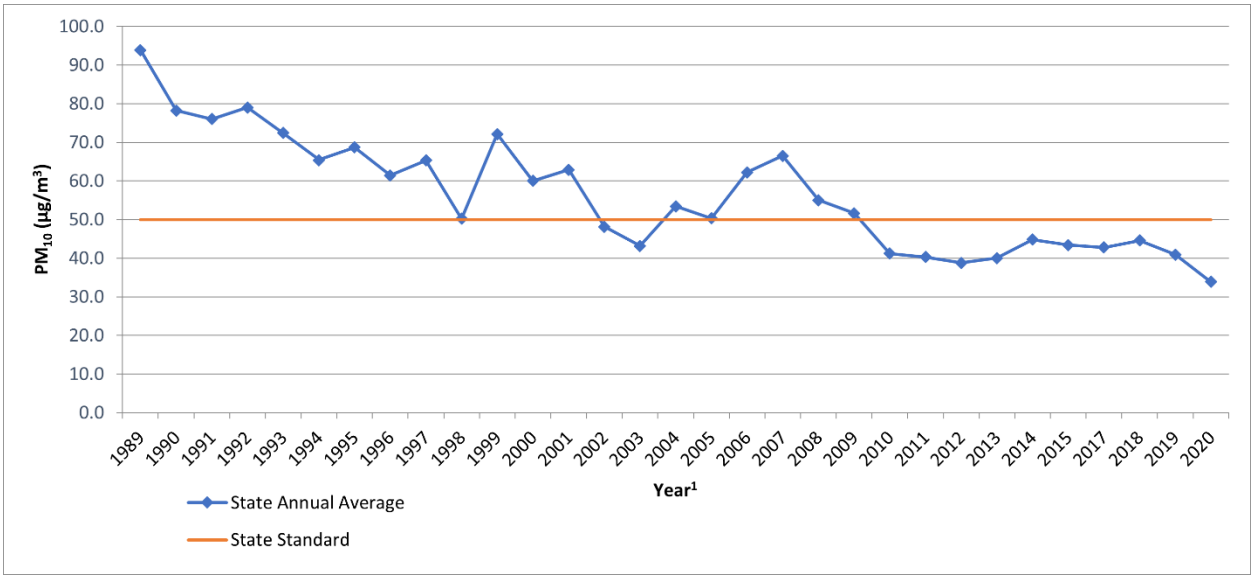
The most recent CO concentrations in the SCAB are shown in Figure 4.2-6, *SCAB CO Trend*. CO concentrations in the SCAB have decreased markedly - a total decrease of more about 80 percent in the peak 8-hour concentration from 1986 to 2012; 2012 is the most recent year where 8-hour CO averages and related statistics are available in the SCAB (Urban Crossroads, 2022a, p. 31).

Figure 4.2-2 SCAB PM_{10} Trend (Federal Standard)



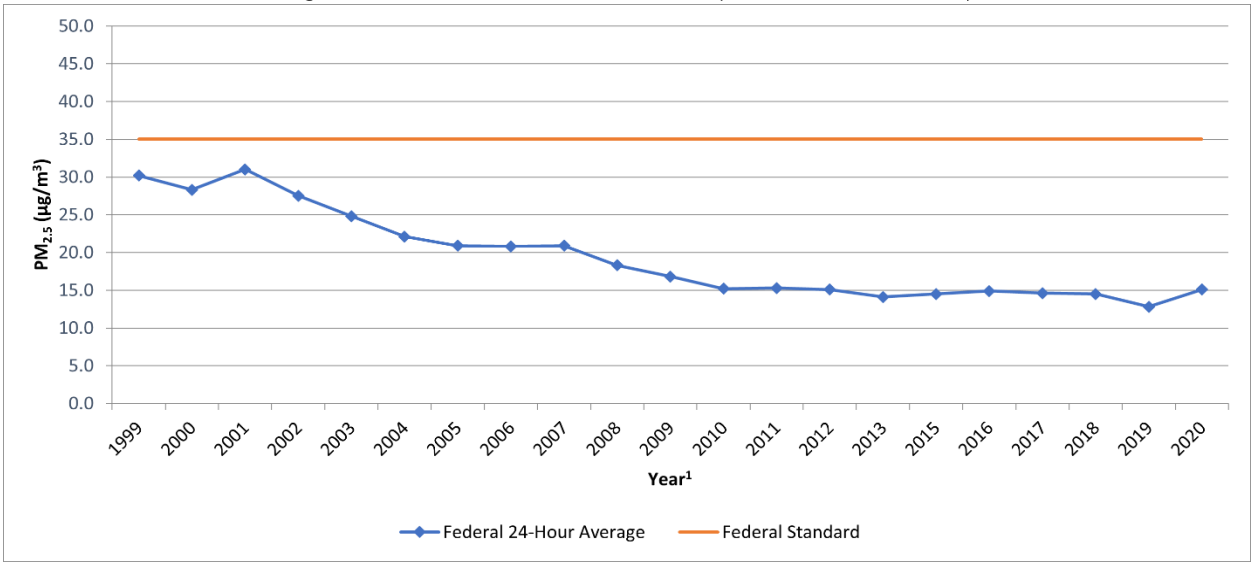
Data from 2020 CARB, iADAM: Top Four Summary: PM_{10} 24-Hour Averages (1988-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
Source: (Urban Crossroads, 2022a, Table 2-6)

Figure 4.2-3 SCAB PM_{10} Trend (State Standard)



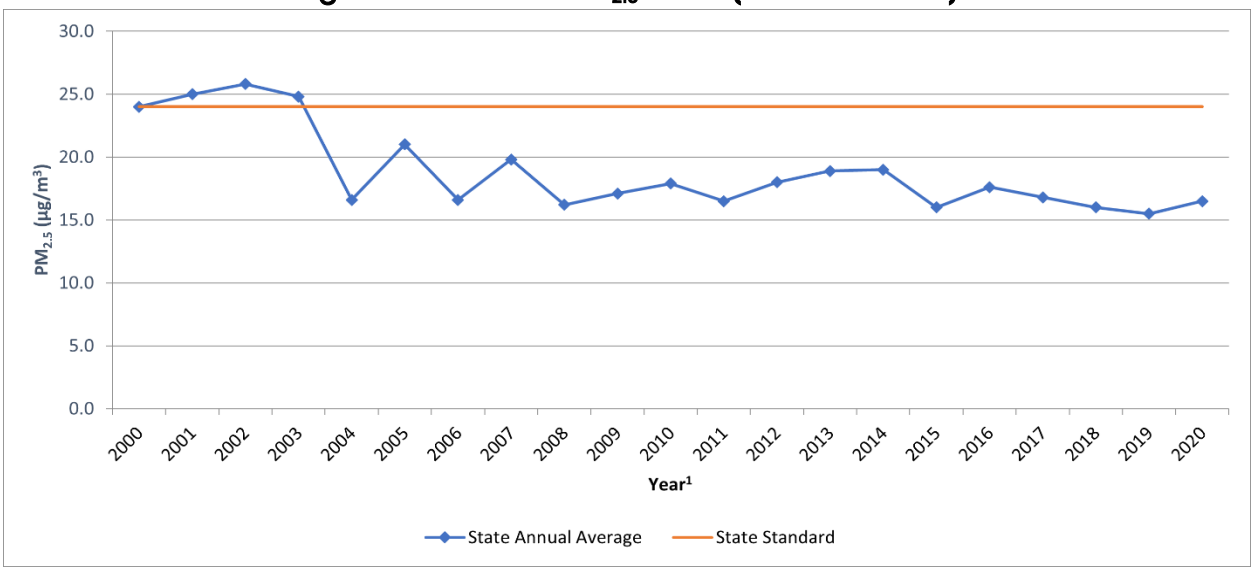
Data from 2020 CARB, iADAM: Top Four Summary: PM_{10} 24-Hour Averages (1988-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
Source: (Urban Crossroads, 2022a, Table 2-7)

Figure 4.2-4 SCAB $PM_{2.5}$ Trend (Federal Standard)



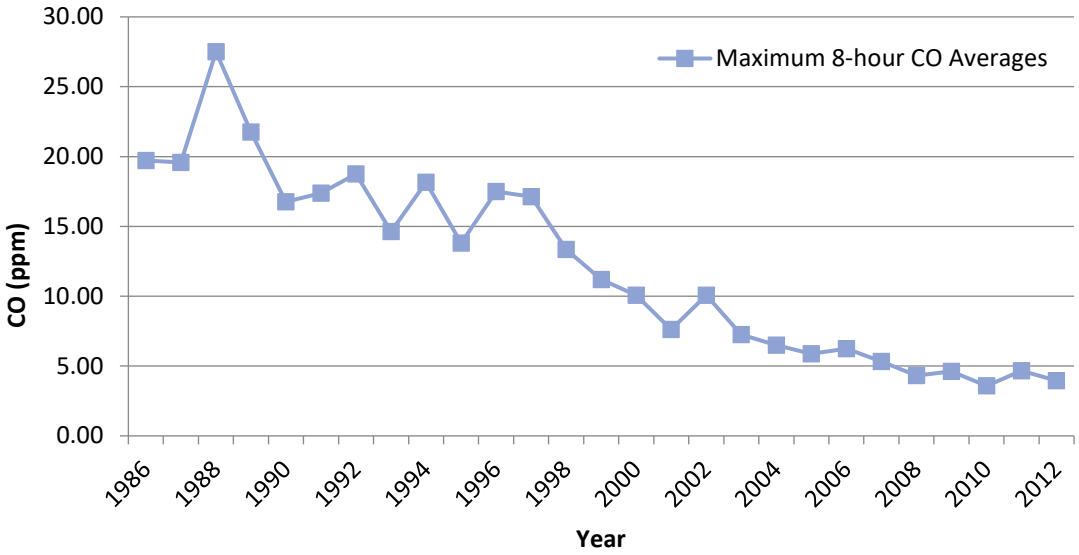
Data from 2020 CARB, iADAM: Top Four Summary: $PM_{2.5}$ 24-Hour Averages (1999-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
Source: (Urban Crossroads, 2022a, Table 2-8)

Figure 4.2-5 SCAB $PM_{2.5}$ Trend (State Standard)



Data from 2020 CARB, iADAM: Top Four Summary: $PM_{2.5}$ 24-Hour Averages (1999-2020)
[1] Some years have been omitted from the table as insufficient data (or no) data has been reported. Years with reported value of "0" have also been omitted.
Source: (Urban Crossroads, 2022a, Table 2-9)

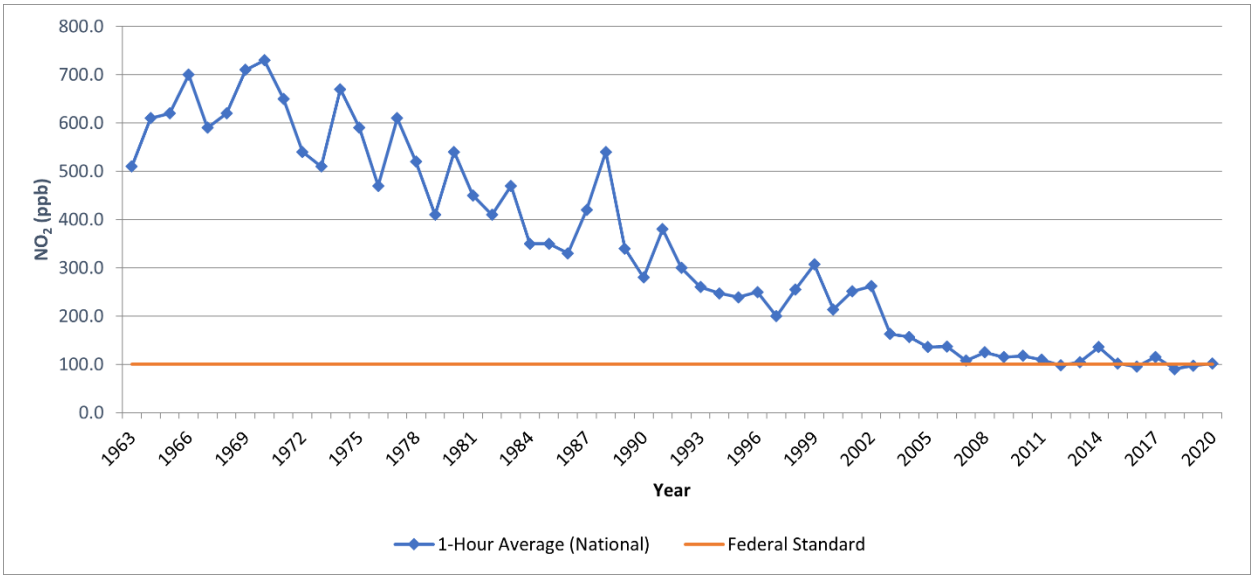
Figure 4.2-6 SCAB CO Trend



Data from 2020 CARB, iADAM: Top Four Summary: CO 8-Hour Averages (1999-2012)
[1] The most recent year where 8-hour concentration data is available is 2012.
Source: (Urban Crossroads, 2022a, Table 2-10)

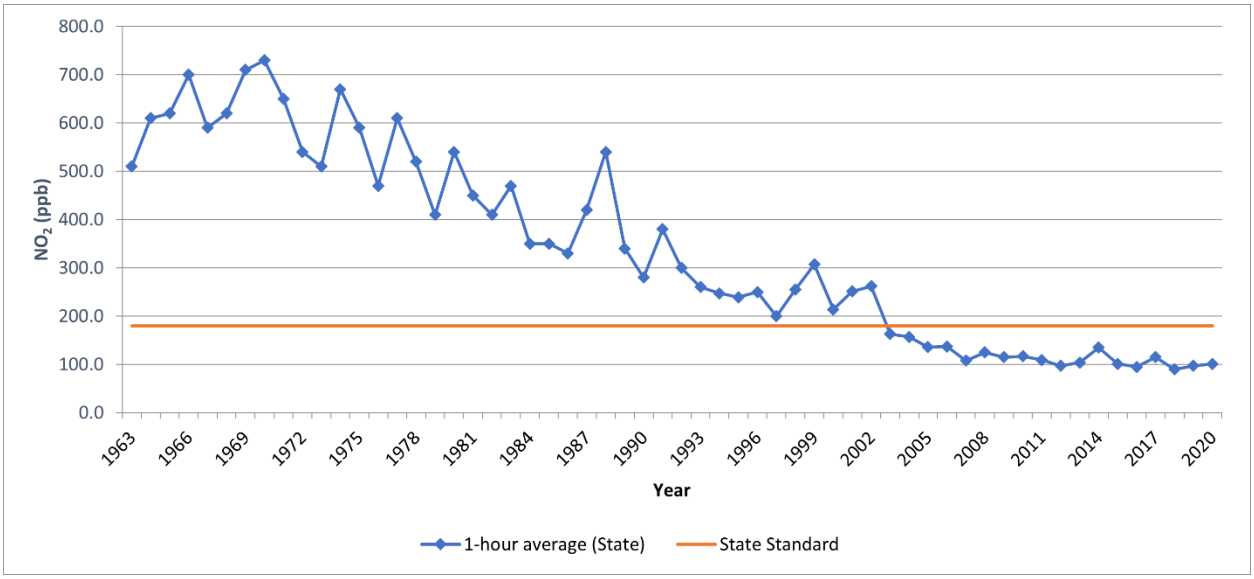
The most recent NO_2 data for the SCAB is shown in Figure 4.2-7, *SCAB 1 NO_2 Trend (Federal Standard)*, and Figure 4.2-8, *SCAB NO_2 Trend (State Standard)*. Over the last 50 years, NO_2 values have decreased significantly; the peak 1-hour national and State averages for 2020 are approximately 80 percent lower than what they were during 1963 (Urban Crossroads, 2022a, p. 32). The SCAB attained the State 1-hour NO_2 standard in 1994, bringing the entire State into attainment. A new State annual average standard of 0.030 parts per million (ppm) was adopted by the California Air Resources Board (CARB) in February 2007. The new standard is just barely exceeded in the SCAQMD. NO_2 is formed from NO_X emissions, which also contribute to O_3. As a result, the majority of the future emission control measures would be implemented as part of the overall O_3 control strategy. Many of these control measures would target mobile sources, which account for more than three-quarters of California's NO_X emissions, and are expected to bring the SCAQMD into attainment of the State annual average standard.

Figure 4.2-7 SCAB NO_2 Trend (Federal Standard)



Data from 2020 CARB, iADAM: Top Four Summary: CO 1-Hour Averages (1963-2020)
Source: (Urban Crossroads, 2022a, Table 2-11)

Figure 4.2-8 SCAB NO_2 Trend (State Standard)

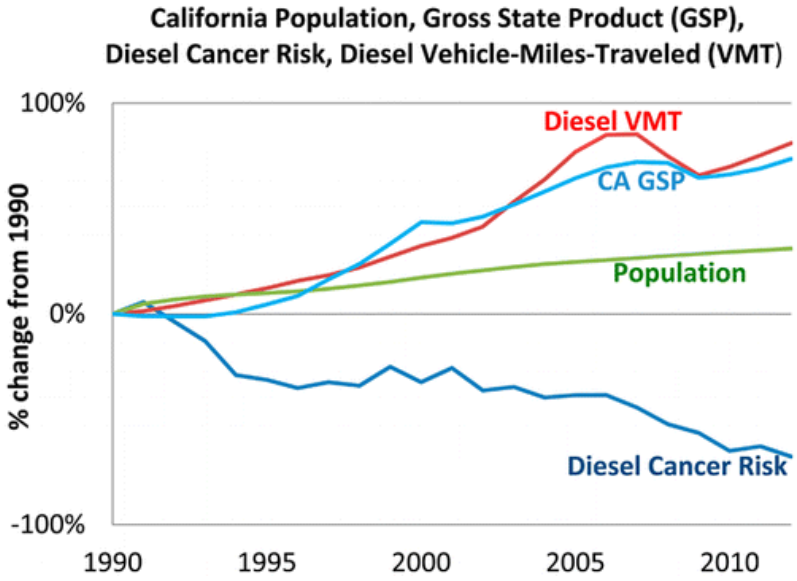


Data from 2020 CARB, iADAM: Top Four Summary: CO 1-Hour Averages (1963-2020)
Source: (Urban Crossroads, 2022a, Table 2-12)

❑ Toxic Air Contaminants

Toxic air contaminants (TACs) are a classification of air pollutants that have been attributed to carcinogenic and non-carcinogenic health risks. Beginning in the mid-1980s, the CARB adopted a series of regulations to reduce the amount of air toxic contaminant emissions resulting from mobile and stationary sources, such as cars, trucks, stationary sources, and consumer products. As a result of CARB's regulatory efforts, ambient concentrations of TACs have declined substantially across the State. To reduce TAC emissions from mobile sources, CARB has required that all light- and medium-duty vehicles sold in California since 1996 be equipped with an on-board diagnostic system to alert drivers of potential engine problems (as approximately half of all tailpipe emissions result from malfunctioning emissions control devices). Also, since 1996, CARB has required the use of cleaner burning, reformulated gasoline in all light- and medium-duty vehicles. These two regulations resulted in an over 85 percent reduction in TAC emissions from light- and medium-duty vehicles in the State between 1990 and 2012 (Urban Crossroads, 2022a, p. 34). The CARB also implemented programs to retrofit diesel-fueled engines and facilitate the use of diesel fuels with ultra-low sulfur content to minimize the amount of diesel emissions and their associated TACs. As a result of CARB's programs, diesel emissions and their associated TACs fell by approximately 71 percent since 2000 despite an approximately 81 percent increase in miles traveled by diesel vehicles during that same time period, as shown on Figure 4.2-9, *Diesel Particulate Matter and Diesel Vehicle Miles Traveled Trends*. Moreover, the average statewide diesel particulate matter (DPM) emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, are projected to dramatically reduce due to regulatory requirements on vehicular emissions adopted by CARB and the Ports of Los Angeles and Long Beach (ibid.).

Figure 4.2-9 DPM and Diesel Vehicle Miles Trend



Source: (Urban Crossroads, 2022a, Exhbit 2-A)

2. *Local Air Quality*

❑ Criteria Pollutants

Ambient air pollutant concentrations in the Project area are summarized in Table 4.2-3, *Project Area Air Quality Monitoring Summary*. Local air quality data was collected from the SCAQMD air quality monitoring station located nearest to the Project Site: the Central San Bernardino Valley 1 monitoring station, which is located 3.6 miles west of the Site. Data was collected for the three most recent years for which data was available (2018-2020).

Table 4.2-3 Project Area Air Quality Monitoring Summary 2018-2020

Pollutant	Standard	Year		
		2018	2019	2020
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.141	0.124	0.151
Maximum Federal 8-Hour Concentration (ppm)		0.111	0.109	0.111
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	38	41	56
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	69	67	89
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.9	2.7	1.7
Maximum Federal 8-Hour Concentration	> 20 ppm	1.1	1.0	1.2
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.063	0.076	0.066
Annual Federal Standard Design Value		0.018	0.017	0.019
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	64	88	61
Annual Federal Arithmetic Mean ($\mu g/m^3$)		34.1	34.8	35.8
Number of Days Exceeding Federal 24-Hour Standard	> 150 $\mu g/m^3$	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 $\mu g/m^3$	9	12	6
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 $\mu g/m^3$	29.20	46.50	46.10
Annual Federal Arithmetic Mean ($\mu g/m^3$)	> 12 $\mu g/m^3$	11.13	10.84	11.95
Number of Days Exceeding Federal 24-Hour Standard	> 35 $\mu g/m^3$	0	0	0

ppm = Parts Per Million
$\mu g/m^3$ = Microgram per Cubic Meter
Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables.
Source: (Urban Crossroads, 2022a, Table 2-4)

❑ **Toxic Air Contaminants**

As part of preparation of the *MATES-V* study, the SCAQMD collected toxic air contaminant data at 10 fixed sites within the SCAB. None of the fixed monitoring sites are located within the vicinity of the Project Site; however, *MATES-V* extrapolates the excess cancer risk levels throughout the SCAB using mathematical modeling for specific geographic grids. *MATES-V* estimates an excess carcinogenic risk of approximately 437 in one million for the Project area, placing the Project area within the 78th percentile for cancer risk in the SCAB (SCAQMD, 2022). For comparison, the prior version of SCAQMD's *MATES* analysis, *MATES-IV*, estimated the Project area was in the 93rd percentile for cancer risk with an excess cancer risk of 838 in one million (ibid.). The trend in the Project area of improving toxic air contaminant risk levels mirrors the overall trend of improving air quality within the SCAB, as described earlier in this Subsection.

Notwithstanding the improvement in local toxic air contaminant risk levels modeled by, the census tract containing the Project Site is mapped by OEHHA within the 94th percentile for pollution burden which, based on the census tract's demographic characteristics, results in OEHHA ranking the area within the 72nd percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022).

2. Project Site Air Quality

The Project Site is vacant and undeveloped under existing conditions and does not produce criteria pollutants or TACs, with the exception of negligible pollutants produced by maintenance equipment during periodic weed abatement activities on the Site. Table 4.2-3, above, presents the local air quality data collected from the SCAQMD air quality monitoring station located 3.6 miles west of the Project Site.

4.2.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and related regulations governing air quality emissions.

A. Federal Plans, Policies, and Regulations

1. Federal Clean Air Act

The Clean Air Act (CAA; 42 U.S.C. Section 7401 et seq.) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants, which include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_x), sulfur dioxide (SO_2), particulate matter (PM_{10}), $PM_{2.5}$, and lead (Pb) (EPA, 2021a).

One of the goals of the CAA was to set and achieve NAAQS in every state by 1975 in order to address the public health and welfare risks posed by certain widespread air pollutants. The setting of these pollutant standards was coupled with directing the states to develop state implementation plans (SIPs), applicable to appropriate industrial sources in the state, in order to achieve these standards. The CAA was amended in 1977

and 1990 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines.

The sections of the federal CAA most directly applicable to the development of the Project Site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions address the urban air pollution problems of O_3 (smog), CO, and PM_{10}. Specifically, it clarifies how areas are designated and re-designated "attainment." It also allows EPA to define the boundaries of "nonattainment" areas: geographical areas whose air quality does not meet Federal air quality standards designed to protect public health. (EPA, 2020) Mobile source emissions are regulated in accordance with the CAA Title II provisions. These standards are intended to reduce tailpipe emissions of hydrocarbons, CO, and NO_X on a phased-in basis that began in model year 1994. Automobile manufacturers also are required to reduce vehicle emissions resulting from the evaporation of gasoline during refueling. These provisions further require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas.

Section 112 of the Clean Air Act addresses emissions of hazardous air pollutants. Prior to 1990, CAA established a risk-based program under which only a few standards were developed. The 1990 Clean Air Act Amendments revised Section 112 to first require issuance of technology-based standards for major sources and certain area sources. "Major sources" are defined as a stationary source or group of stationary sources that emit or have the potential to emit 10 tons per year or more of a hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An "area source" is any stationary source that is not a major source.

For major sources, Section 112 requires that EPA establish emission standards that require the maximum degree of reduction in emissions of hazardous air pollutants. These emission standards are commonly referred to as "maximum achievable control technology" or "MACT" standards. Eight years after the technology-based MACT standards are issued for a source category, EPA is required to review those standards to determine whether any residual risk exists for that source category and, if necessary, revise the standards to address such risk.

2. SmartWay Program

The US EPA's SmartWay Program is a voluntary public-private program developed in 2004, which 1) provides a comprehensive and well-recognized system for tracking, documenting and sharing information about fuel use and freight emissions across supply chains; 2) helps companies identify and select more efficient freight carriers, transport modes, equipment, and operational strategies to improve supply chain sustainability and lower costs from goods movement; 3) supports global energy security and offsets environmental risk for companies and countries; and 4) reduces freight transportation-related emissions by accelerating the use of advanced fuel-saving technologies (EPA, 2017). This program is supported by major transportation industry associations, environmental groups, State and local governments, international agencies, and the corporate community.

B. State Plans, Policies, and Regulations

1. California Clean Air Act (CCAA)

The California Clean Air Act (CCAA) establishes numerous requirements for district plans to attain state ambient air quality standards for criteria air contaminants (SCAQMD, n.d.). The CCAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the State's ambient air quality standards, the California Ambient Air Quality Standards (CAAQS), by the earliest practical date. The California Air Resources Board (CARB) established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, established standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. Generally, the CAAQS are more stringent than the NAAQS. For districts with serious air pollution, its attainment plan should include the following: no net increase in emissions from new and modified stationary sources; and best available retrofit technology for existing sources.

2. Air Toxic Hot Spots Act

The Air Toxic "Hot Spots" Information and Assessment Act of 1987, commonly known as AB 2588, (Health & Safety Code Section 44300, *et seq*.) requires facilities emitting specified quantities of pollutants to conduct risk assessments describing the health impacts to neighboring communities created by their emissions of numerous specified hazardous compounds (SCAQMD, n.d.). If the district determines the health impact to be significant, neighbors must be notified. In addition, state law requires the facility to develop and implement a plan to reduce the health impacts to below significance, generally within five years. Additional control requirements for hazardous emissions from specific industries are established by the state and enforced by districts.

3. Air Quality Management Planning

The California Air Resources Board (CARB) and local air districts throughout the State are responsible for developing clean air plans to demonstrate how and when California will attain air quality standards established under both the CAA and CCAA. For the areas within California that have not attained air quality standards, CARB works with local air districts to develop and implement State and local attainment plans. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures (CARB, 2012). Plans may also include interim milestones for progress toward attainment. Air quality planning activities undertaken by CARB also include the development of policies, guidance, and regulations related to State and federal ambient air quality standards; coordination with local agencies on transportation plans and strategies; and providing assistance to local districts and transportation agencies.

4. Truck & Bus Regulation

Under the Truck and Bus Regulation, adopted by CARB in 2008, all diesel truck fleets operating in California are required to adhere to an aggressive schedule for upgrading and replacing heavy-duty truck engines (CARB, n.d.). Older, more polluting trucks are required to be replaced first, while trucks that already have relatively

clean engines are not required to be replaced until later. Pursuant to the Truck and Bus Regulation, all pre-1994 heavy trucks (trucks with a gross vehicle weight rating greater than 26,000 pounds) were removed from service on California roads by 2015. Between 2015 and 2020, pre-2000 heavy trucks were equipped with PM filters and upgraded or replaced with an engine that meets 2010 emissions standards. The upgrades/replacements occurred on a rolling basis based on model year. By 2023, all heavy trucks operating on California roads must have engines that meet 2010 emissions standards. Lighter trucks (those with a gross vehicle weight rating of 14,001 to 26,000 pounds) adhered to a similar schedule, and were all replaced by 2020.

5. Advanced Clean Truck Regulation

In June, 2020, CARB adopted a new Rule requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024 and, by 2045, every new truck sold in California will be required to be zero-emission (CARB, 2021). Manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales. CARB reports that as of 2020, most commercially-available models of zero-emission vans, trucks and buses operate less than 100 miles per day. Commercial availability of electric-powered long-haul trucks is very limited. However, as technology advances over the next 20 years, zero-emission trucks will become suitable for more applications, and several truck manufacturers have announced plans to introduce market ready zero-emission trucks in the future.

6. California Air Resources Board Rules

The CARB enforces rules related to air pollutant emissions in the State of California. Rules with applicability to the Project include, but are not limited to, those listed below.

- CARB Rule 2485 (13 CCR 2485): Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling, which limits nonessential idling to five minutes or less for commercial trucks.
- CARB Rule 2449 (13 CCR 2449): In-Use Off-Road Diesel Idling Restricts, which limits nonessential idling to five minutes or less for diesel-powered off-road equipment.

C. Local Plans, Policies, and Regulations

1. SCAQMD Air Quality Management Plan

Under existing conditions, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, and in conformance with California Health & Safety Code Section 40702 *et seq.* and the California CAA, the SCAQMD adopted an AQMP to plan for the improvement of regional air quality. AQMPs are updated regularly in order to more effectively reduce emissions and accommodate growth. Each version of the plan is an update of the previous plan and has a 20-year horizon with a revised baseline. The SCAQMD's most recent iteration of the AQMP was adopted in March 2017 (SCAQMD, 2017a).

2. SCAQMD Rules

The SCAQMD enforces rules related to air pollutant emissions in the SCAB. Rules with applicability to the Project include, but are not limited to, those listed below.

- SCAQMD Rule 402 (Nuisance Odors): Prohibits the discharge of air contaminants that cause nuisance or annoyance to any considerable number of persons or to the public.
- SCAQMD Rule 403 (Fugitive Dust): Requires the implementation of best available dust control measures (BACMs) during activities capable of generating fugitive dust. Rule 403 also requires activities defined as "large operations" to notify the SCAQMD by submitting specific forms; a large operation is defined as any active operation on property containing 50 or more acres of disturbed surface area; or any earth moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards), three times during the most recent 365-day period.
- SCAQMD Rule 431.2 (Low Sulfur Fuel): Requires the use of diesel fuels that adhere to sulfur content limits.
- SCAQMD Rule 1108 (Cutback Asphalt): Prohibits the use of asphalt that exceeds a specified percentage of VOCs.
- SCAQMD Rule 1113 (Architectural Coatings): Requires all buildings within the SCAQMD to adhere to the VOC limits for architectural coatings.
- SCAQMD Rule 1186 (PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations): Requires the use of street sweepers that meet minimum standards for cleaning capabilities.
- SCAQMD Rule 1301 (General): Provides pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the NAAQS. Rule 1301 also limits emission increase of ammonia and ozone depleting compounds from new, modified, or relocated facilities by requiring the use of Best Available Control Technology (BACT).
- SCAQMD Rule 1401 (New Source Review of Toxic Air Contaminants): Prohibits a person from discharging into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.
- SCAQMD Rule 2305 (Warehouse Indirect Source Rule): Requires all operators of warehouses greater than or equal to 100,000 s.f. of indoor floor space to implement measures that reduce nitrogen oxides and particulate matter emissions and/or pay a fee to fund programs to improve regional air quality.

4.2.3 Basis for Determining Significance

The thresholds listed below are derived directly from CEQA Guidelines Appendix G and address the typical, adverse effects to regional and local air quality that could result from development projects. The proposed Project would result in a significant impact to air quality if the Project or any Project-related component would:

a. Conflict with or obstruct implementation of the applicable air quality plan;

b. Result in a cumulatively-considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);

c. Expose sensitive receptors to substantial pollutant concentrations; or

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The Project would result in a significant impact under Threshold "a" if the Project were determined to conflict with the SCAQMD *2016 AQMP*. Pursuant to Chapter 12, Sections 12.2 and 12.3, of the SCAQMD *CEQA Air Quality Handbook*, a project would conflict with the *AQMP* if either of the following conditions were to occur:

- The Project would increase the frequency or severity of existing NAAQS and/or CAAQS violations, cause or contribute to new air quality violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP; or
- The Project would exceed the 2016 AQMP's future year buildout assumptions.

The evaluation under Threshold "b," follows the SCAQMD's cumulative impact analysis guidance in their *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*: "[T]he AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR … Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant" (SCAQMD, 2003, pp. D-3). Accordingly, implementation of the Project would result in a cumulatively-considerable impact if the Project's construction and/or operational activities exceed one or more of the SCAQMD's "Regional Thresholds" for criteria pollutant emissions, as summarized in Table 4.2-4, *Maximum Daily Regional Emissions Thresholds*.

Table 4.2-4 Maximum Daily Regional Emissions Thresholds

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

lbs/day = Pounds Per Day
Source: (Urban Crossroads, 2022a, Table 3-1)

For evaluation under Threshold "c," the Project would result in a significant direct or cumulatively considerable impact if any of the following were to occur (see discussion on preceding page):

- The Project's localized criteria pollutant emissions would exceed one or more of the applicable SCAQMD "Localized Thresholds" listed in Table 4.2-5, *Maximum Daily Localized Construction Emissions Thresholds*, and Table 4.2-6, *Maximum Daily Localized Operational Emissions Thresholds*.

- The Project would cause or contribute to a CO "Hot Spot;" and/or

- The Project's toxic air contaminant emissions, like DPM, would expose sensitive receptor populations to an incremental cancer risk that exceeds the SCAQMD significance criteria of greater than 10 in one million; and/or result in a non-carcinogenic health risk rating ("Acute Hazard Index") greater than 1.0.

Table 4.2-5 Maximum Daily Localized Construction Emissions Thresholds

Construction Phase	Pollutant	Construction Localized Thresholds
Site Preparation & Grading	NO_X	141 lbs/day (Site Preparation) 294 lbs/day (Grading)
	CO	965 lbs/day (Site Preparation) 2,240 lbs/day (Grading)
	PM_{10}	196 lbs/day (Site Preparation) 229 lbs/day (Grading)
	$PM_{2.5}$	98 lbs/day (Site Preparation) 120 lbs/day (Grading)

Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008
Source: (Urban Crossroads, 2022a, Table 3-10)

Table 4.2-6 Maximum Daily Localized Operational Emissions Thresholds

Pollutant	Operational Localized Thresholds
NO_X	294 lbs/day
CO	2,240 lbs/day
PM_{10}	55 lbs/day
$PM_{2.5}$	29 lbs/day

Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008
Source: (Urban Crossroads, 2022a, Table 3-12)

For evaluation under Threshold "d," a significant impact would occur if the Project's construction and/or operational activities result in air emissions leading to an odor nuisance pursuant to SCAQMD Rule 402.

4.2.4 Methodology for Calculating Project-Related Air Quality Impacts

The California Emissions Estimator Model (CalEEMod), version 2022.1, was used to calculate all Project-related air pollutant emissions (with the exception of localized emissions and diesel particulate matter emissions from Project operations, refer to Subsection 4.2.3B, below). The CalEEMod is a Statewide land use emission computer model developed for the California Air Pollution Officers Association (CAPCOA) in

collaboration with the California Air Districts, including the SCAQMD, that provides a uniform platform to quantify potential criteria pollutant emissions associated with construction and operation of land development projects.

A. Methodology for Calculating Project Construction Emissions

1. Regional Pollutant Emissions

The Project's construction period will last approximately 10 months and will include five (5) activity phases: 1) site preparation; 2) grading; 3) building construction; 4) paving; and 5) architectural coating. For purposes of the air quality analysis, the Project's construction activities are assumed to occur between June 2023 and April 2024. This assumption represents a conservative analysis scenario because, should construction occur later than the dates assumed in the analysis, construction equipment emissions would be the same or, more likely, lower than presented because emission regulations are becoming more stringent over time and the retirement of older (higher-polluting) equipment and replacement with newer (less-polluting) pieces of equipment is constantly happening in response to State regulations or service needs (Urban Crossroads, 2022a, p. 40). The air quality analysis model utilizes the durations of each construction activity phase and the construction equipment fleet previously presented in EIR Section 3.0, *Project Description*. The analysis assumptions for Project construction are based on information provided by the Project Applicant and the experience and technical expertise of the Project's air quality technical expert (Urban Crossroads).

Refer to Section 3.4 of the Project's AQIA for more detail on the methodology utilized to calculate the Project's construction-related regional pollutant emissions.

2. Localized Pollutant Emissions

Project-related localized pollutant emissions were calculated in accordance with the SCAQMD's *Final Localized Significance Threshold (LST) Methodology*. The equipment-specific grading rates were obtained from the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User's Guide *Appendix C: Emission Calculation Details for CalEEMod*. Based on these information sources, the Project was calculated to disturb one (1) acre per day during the site preparation phase of construction and five (5) acres per day during the grading phase of construction. SCAQMD's methodology recommends using look-up tables for projects with a disturbance area of less than or equal to one (1), two (2), or five (5) acres in size and using dispersion modeling for projects with a disturbance area greater than five (5) acres in size. Because the Project is assumed to disturb five acres or less during both the site preparation and grading phases of construction, the SCAQMD's screening look-up tables were utilized to determine localized pollutant concentration levels at sensitive receptor locations near the Project Site. Emission concentrations were modeled at nine (9) receptor locations near the Project Site, including existing residences east of SR-210 and existing businesses west, south, and southeast of the Project Site.

The SCAQMD's *Final Localized Significance Threshold Methodology* indicates that off-site mobile emissions from development projects should be excluded from localized emissions analyses. Therefore, for purposes of calculating the Project's construction-related localized pollutant emissions, only emissions included in the CalEEMod on-site emissions outputs were considered.

Refer to Section 3.6 of the Project's AQIA (Technical Appendix B) for more detail on the methodology utilized to calculate Project construction-related localized pollutant emissions.

3. Diesel Particulate Matter Emissions

Diesel particulate matter (DPM) emissions from construction equipment operating on the Project Site and haul trucks traveling to and from the Project Site were calculated with CalEEMod.

The potential health risks of Project-related DPM emissions were quantified at maximally-impacted sensitive receptor locations in accordance with the guidelines in the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Pursuant to SCAQMD's recommendations, emissions were modeled using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) software program. Refer to Section 2.3 of the Project's HRA (Technical Appendix C) for a detailed description of the model inputs and equations used in the calculation of average particulate concentrations during construction of the Project and see Figure 4.2-10 for the location of maximally-impacted sensitive receptors uses in this analysis.

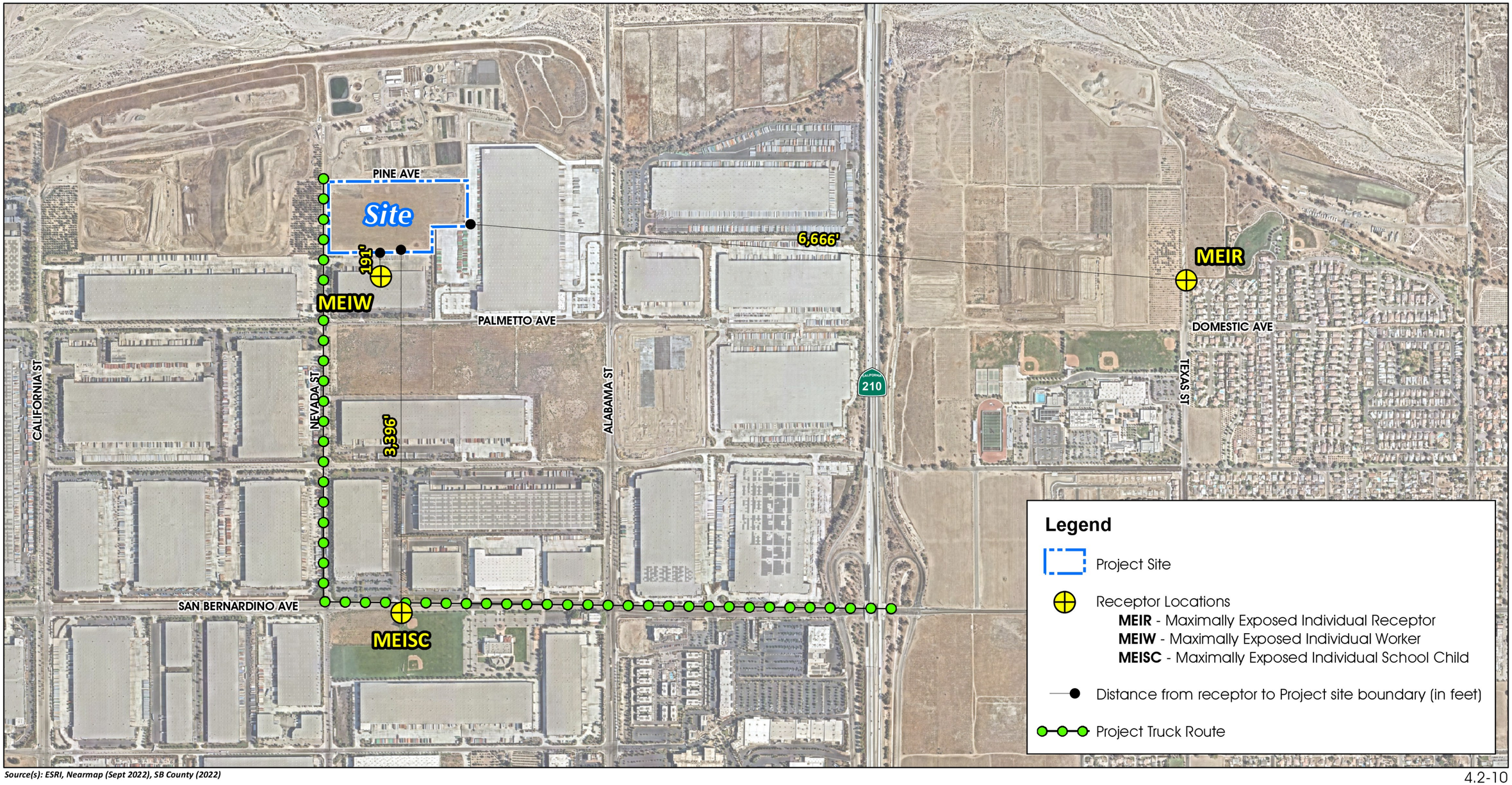
Health risks associated with exposure to DPM emissions at a given concentration are defined in terms of the probability of developing cancer or chronic non-cancer health effects as a result of exposure to DPM emissions at a given concentration. The cancer and non-cancer risk probabilities are determined through a series of equations to calculate unit risk factor, cancer potency factor, and chronic daily intake. The evaluation results in a maximum health risk value, which is merely a calculation of risk and does not necessarily mean that any individual will contract cancer or other non-cancer health concern as a result of the exposure. The equations and input factors utilized in the Project analysis were obtained from Office of Environmental Health Hazard Assessment (OEHHA). Refer to Sections 2.4 and 2.5 of the Project's HRA for a detailed description of the variable inputs and equations used in the calculations of receptor population health risks associated with Project construction.

B. Methodology for Calculating Project Operational Emissions

1. Regional Pollutant Emissions

The Project's operational-related regional pollutant emissions analysis quantifies air pollutant emissions from mobile sources, including TRUs, area sources (e.g., architectural coatings, consumer products, landscape maintenance equipment), and energy sources.

Mobile source emissions are the product of the number of daily vehicle trips generated by the Project, the composition of the Project's vehicle fleet (mix of passenger cars, motorcycles, light-heavy-duty trucks, medium-heavy-duty trucks, and heavy-heavy duty trucks), and the trip length (number of miles driven) by Project vehicles. The Project's average number of daily vehicle trips and vehicle fleet mix were determined using the methodology described in detail in EIR Subsection 4.11, *Transportation*. A travel length of 16.2 miles was used for Project-related passenger vehicles trips based on the vehicle miles traveled (VMT) screening analysis performed for the Project (refer to EIR Subsection 4.11 for more information related to the



Source(s): ESRI, Nearmap (Sept 2022), SB County (2022)

4.2-10

0 225 450 900 Feet

Maximally Impacted Sensitive Receptor Locations

Project's VMT analysis). The travel length for Project-related heavy-duty truck trips is based on figures published by SCAQMD: 14.2 miles for 2- and 3-axle heavy-duty trucks and 40.0 miles for 4+-axle heavy-duty trucks.

For purposes of analysis in this EIR, the Project is assumed to contain refrigerated (cold) storage space – occupying up to 25 percent of the Project's building floor area. Accordingly, the air quality analysis accounts for transport refrigeration units (TRUs) on approximately 25 percent of all heavy-duty trucks serving the Project Site on a daily basis (approximately 37 trucks). The TRU calculations are based on EMissions FACtor Model version 2021 (EMFAC2021), developed by the CARB. EMFAC2021 does not provide emission rates per hour or mile as with the on-road emission model and only provides annual emission inventories. These inventories are not always consistent with assumptions used in the modeling of project-level air pollutant emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project-level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation.

The Project's operational analysis assumes the use of two 84 horsepower, diesel-powered yard-tractors (also known as a terminal tractor, yard goat, yard truck, yard mule, or yard dog) on the Project Site for up to four (4) hours per day for all 365 days of the year.

The estimated area source emissions and energy source emissions analyses for the Project rely on default inputs within CalEEMod.

Refer to Section 3.5 of the Project's AQIA for detailed information on the methodology utilized to calculate regional pollutant emissions during Project operation.

2. Localized Pollutant Emissions

The SCAQMD's *Final Localized Significance Threshold Methodology* provides look-up tables for sites with an area of five (5) acres or less. For development projects that exceed five acres in size, like the Project, the LST look-up tables provide a conservative analysis approach because the look-up tables assume that all of the air pollutant emissions produced across the entire development site are concentrated within a five-acre area instead of being dispersed across the entire development site. Thus, this analysis method over-predicts potential localized air quality impacts for larger projects, and in the case of the proposed Project would over-predict localized impacts by more than three (i.e., emissions spread across the 17.7-acre Project Site would be concentrated within a five-acre area for analysis purposes).

The *Final Localized Significance Threshold Methodology* only provides for the evaluation of on-site emissions sources because the CalEEMod outputs do not separate on-site and off-site mobile source emissions. Notwithstanding, on-site mobile source emissions are manually added to the LST analysis by estimating emissions from mobile sources operating on the Project Site. The emissions from on-Site mobile sources are estimated to be equivalent to five (5) percent of the Project's one-way vehicle trip length, which far exceeds

the actual maximum distance a passenger car or truck could travel through the Project's parking lots and, thus, represents a conservative assumption that overstates the actual localized impact of the Project's on-site mobile source emissions.

The operational LST analysis utilizes the same sensitive receptor locations that were utilized in the construction LST analysis.

Refer to Section 3.8 of the Project's AQIA for detailed information on the methodology utilized to calculate the Project's operational localized pollutant emissions.

3. Diesel Particulate Matter Emissions

DPM emissions from trucks traveling to and from the Project Site were calculated using emission factors for PM_{10} generated with the EMissions FACtor 2021 model (EMFAC 2021). Refer to Section 2.3 of the Project's HRA for a detailed description of the model inputs and equations used in the estimation of the Project-related DPM emissions.

The potential health risks of Project-related DPM emissions were quantified at maximally-impacted sensitive receptor locations in accordance with the guidelines in the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Pursuant to SCAQMD's recommendations, emissions were modeled using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) software program. Refer to Section 2.3 of the Project's HRA for a detailed description of the model inputs and equations used in the calculation of average particulate concentrations during operation of the Project and see Figure 4.2-10 for the location of maximally-impacted sensitive receptors uses in this analysis.

Health risks associated with exposure to DPM emissions at a given concentration are defined in terms of the probability of developing cancer or chronic non-cancer health effects as a result of exposure to DPM emissions at a given concentration. The cancer and non-cancer risk probabilities are determined through a series of equations to calculate unit risk factor, cancer potency factor, and chronic daily intake. The evaluation results in a maximum health risk value, which is merely a calculation of risk and does not necessarily mean that any individual will contract cancer or other non-cancer health concern as a result of the exposure. The equations and input factors utilized in the Project analysis were obtained from Office of Environmental Health Hazard Assessment (OEHHA). Refer to Sections 2.4 and 2.5 of the Project's HRA for a detailed description of the variable inputs and equations used in the calculations of receptor population health risks associated with Project operations.

4.2.5 IMPACT ANALYSIS

Threshold "a:" Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The SCAQMD *2016 AQMP*, which is the applicable air quality plan for the Project area, addresses long-term air quality conditions for the SCAB. The criteria for determining consistency with the *2016 AQMP* are analyzed below.

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

Consistency Criterion No. 1 refers to violations of the NAAQS and CAAQS. Violations of the NAAQS and/or CAAQS would occur if the emissions resulting from the Project were to exceed the SCAQMD's localized emissions thresholds. As a conservative measure, the Project's regional emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$ also are considered in this consistency determination because if the Project's emissions of any of these pollutants would exceed the applicable SCAQMD regional thresholds, then these emissions could delay the SCAB's attainment of federal and/or State ozone or particulate matter standards. As disclosed under the analysis for Threshold "c," below, Project-related activities would not exceed SCAQMD localized emissions thresholds during construction or long-term operation and, thus, would not directly cause new violations of the NAAQS and/or CAAQS. In addition, as disclosed under the analysis for Threshold "b," below, operation of the Project would not result in emissions of any criteria pollutant in excess of the applicable SCAQMD regional threshold and, therefore, would not result in a long-term increase in the frequency or severity of existing air quality violations in the SCAB. Based on the foregoing information, the Project would not conflict with Consistency Criterion No. 1.

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

The growth forecasts used in the *AQMP* to calculate future regional emissions levels are based on land use planning data provided by lead agencies via their general plan documentation. Development projects that increase the intensity of use on a specific property beyond the respective general plan's vision may result in increased stationary area source emissions and/or vehicle source emissions when compared to the *AQMP* assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the *AQMP*. The proposed Project is consistent with the Countywide Plan and East Valley Area Plan land use designation for the subject property; thus, the Project would be consistent with the growth assumptions used in the *AQMP* and would not exceed the *AQMP*'s long-term emissions projections. Accordingly, the Project would not conflict with Consistency Criterion No. 2.

Conclusion

For the reasons stated above, the Project would not result in a substantial adverse environmental impact due to an increase in the frequency or severity of existing air quality violations, the creation of new violations, the

delay the timely attainment of air quality standards or the interim emissions reductions specified in the *AQMP*, or the exceedance of growth assumptions in the *AQMP*. As such, impacts would be less than significant.

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

As noted earlier in this Subsection, the SCAB has a "non-attainment" designation for ozone (1- and 8-hour) and particulate matter ($PM_{2.5}$ and PM_{10}) under existing conditions; thus, any direct emissions of these pollutants or their precursors that exceed applicable SCAQMD significance thresholds would be considered significant.

A. Construction Emissions Impact Analysis

Peak emissions from Project construction are summarized in Table 4.2-7, *Peak Construction Emissions Summary*. Detailed air model outputs are presented in Appendix 3.1 of the Project's AQIA. As shown in Table 4.2-7, peak construction-related emissions of VOCs, NO_X, CO, SO_X, and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed the applicable SCAQMD regional thresholds. Accordingly, the Project's construction activities would not emit substantial concentrations of these pollutants and would not contribute to an existing or projected air quality violation on a cumulatively-considerable basis. Project construction impacts related to emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ would all be less than significant, without mitigation.

Table 4.2-7 Peak Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2023	5.11	51.40	39.90	0.09	5.41	3.07
2024	51.80	20.50	38.60	0.05	3.89	1.48
Winter						
2023	2.22	15.20	25.20	0.04	3.11	1.14
2024	49.50	15.90	27.80	0.04	3.52	1.23
Maximum Daily Emissions	**51.80**	**51.40**	**39.90**	**0.09**	**5.41**	**3.07**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the Project's AQIA.
Source: (Urban Crossroads, 2022a, Table 3-5)

B. Operational Emissions Impact Analysis

The calculated peak operational-source emissions are summarized on Table 4.2-8, *Peak Operational Emissions Summary*. The air model outputs for the operational analysis are provided in Appendix 3.2 and 3.3 of the Project's AQIA.

As summarized in Table 4.2-8, Project-related operational emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation. The Project's long-term emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would be less than significant.

Table 4.2-8 Peak Operational Emissions Summary

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	7.16	12.16	33.55	0.13	3.40	0.80
Area Source	11.89	0.13	16.54	0.00	0.03	0.03
Energy Source	0.16	1.88	2.49	0.00	0.10	0.10
TRU Source	2.65	2.94	0.32	0.00	0.13	0.12
On-Site Equipment Source	0.12	1.20	1.92	< 0.005	0.05	0.05
Total Maximum Daily Emissions	**21.98**	**18.31**	**54.82**	**0.13**	**3.71**	**1.10**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	6.99	12.79	28.78	0.13	3.40	0.80
Area Source	9.18	0.00	0.00	0.00	0.00	0.00
Energy Source	0.16	1.88	2.49	0.00	0.10	0.10
TRU Source	2.65	2.94	0.32	0.00	0.13	0.12
On-Site Equipment Source	0.12	1.20	1.92	< 0.005	0.05	0.05
Total Maximum Daily Emissions	**19.10**	**18.81**	**33.51**	**0.13**	**3.68**	**1.07**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

CalEEMod operational-source emissions are presented in Appendices 3.2 and 3.3 of the Project's AQIA.
Source: (Urban Crossroads, 2022a, Table 3-8)

Threshold "c:" Would the Project expose sensitive receptors to substantial pollutant concentrations?

The Project has the potential to result in the exposure of sensitive receptors to substantial pollutant concentrations during construction and operation. The following analysis addresses the potential for Project-related activities to exceed applicable LSTs for criteria pollutant emissions; cause or contribute to CO "hot spots," and result in cancer risks and non-cancer health hazards to nearby sensitive receptors.

A. Localized Criteria Pollutant Analysis

1. Construction Analysis

Table 4.2-9, *Localized Construction-Source Emissions Summary*, presents the localized air pollutant concentrations at the sensitive receptor locations in the vicinity of the Project Site with highest exposure to Project construction activities. Detailed construction model outputs are presented in Appendix 3.1 of the Project's AQIA. As shown in Table 4.2-9, localized emissions from Project construction would not exceed the applicable SCAQMD thresholds for any criteria pollutant and impacts would be less than significant.

2. Operational Analysis

Table 4.2-10, *Localized Operations-Source Emissions Summary*, presents localized air pollutant concentrations at the sensitive receptor locations in the vicinity of the Project Site with highest exposure to Project operational activities. Detailed construction model outputs are presented in Appendix 3.2 and 3.3 of the Project's AQIA. As shown in Table 4.2-10, localized emissions from Project operations would not exceed the applicable SCAQMD thresholds for any criteria pollutant and impacts would be less than significant.

Table 4.2-9 Localized Construction-Source Emissions Summary

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation				
2023	11.60	9.27	2.22	1.36
Maximum Daily Emissions	**11.60**	**9.27**	**2.22**	**1.36**
SCAQMD Localized Threshold	141	965	196	98
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading				
2023	51.00	38.10	5.09	2.99
Maximum Daily Emissions	**51.00**	**38.10**	**5.09**	**2.99**
SCAQMD Localized Threshold	294	2,240	229	120
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

CalEEMod unmitigated localized construction-source emissions are presented in Appendix 3.1 of the Project's AQIA.
Source: (Urban Crossroads, 2022a, Table 3-11)

Table 4.2-10 Localized Operations-Source Emissions Summary

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Summer	11.41	33.86	1.19	0.54
Winter	9.51	16.88	1.08	0.47
Maximum Daily Emissions	**11.41**	**33.86**	**1.19**	**0.54**
SCAQMD Localized Threshold	294	2,240	55	29
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

CalEEMod localized operational-source emissions are presented in Appendix 3.2 and 3.3 of the Project's AQIA.
Source: (Urban Crossroads, 2022a, Table 3-13)

B. CO Hot Spot Impact Analysis

A CO "hot spot" is an isolated geographic area where localized concentrations of CO exceed the CAAQS one-hour (20 parts per million) or eight-hour (9 parts per million) standards. A Project-specific CO "hot spot" analysis was not performed for the Project because CO attainment in the SCAB was thoroughly analyzed as part of SCAQMD's *2003 AQMP* and the *1992 Federal Attainment for Carbon Monoxide Plan* (*1992 CO Plan*). The *2003 AQMP* and the *1992 CO Plan* found that peak CO concentrations in the SCAB were the byproduct of unusual meteorological and topographical conditions and were not the result of traffic congestion. For context, the CO "hot spot" analysis performed for the *2003 AQMP* recorded a CO concentration of 9.3 parts per million (8-hour) at the Long Beach Boulevard/Imperial Highway intersection in Los Angeles County; however, only a small portion of the recorded CO concentrations (0.7 parts per million) were attributable to traffic congestion at the intersection, which exceeded 4,000 vehicles in the peak hour. The vast majority of the recorded CO concentrations at the Long Beach Boulevard/Imperial Highway intersection (8.6 parts per million) were attributable to unique local meteorological conditions that resulted in elevated ambient air concentrations. In comparison, ambient CO concentrations in the Project vicinity range between 1.2 and 1.7 parts per million (8-hour and 1-hour concentrations, respectively) – less than a quarter of the ambient CO

concentrations recorded at the Long Beach Boulevard/Imperial Highway intersection – and the Project is calculated to generate 58 vehicles in the peak hour (Urban Crossroads, 2022a, pp. 54-55; Urban Crossroads, 2022g, p. 4). Further, data from other air pollution control districts in the State indicate that under existing and future vehicle emission rates, an individual development project would have to increase traffic volumes at a single intersection by between 24,000 and 44,000 vehicles per hour in order to generate a significant CO impact; the Project would generate nowhere near this volume of traffic (ibid.). Based on the relatively low local traffic congestion levels, low existing ambient CO concentrations, and the lack of any unusual meteorological and/or topographical conditions in the Project Site vicinity, the Project is not expected to cause or contribute to a CO "hot spot." Impacts would be less than significant.

C. Toxic Air Contaminant Emissions Impact Analysis

The following analysis evaluates the potential for implementation of the Project to result in acute and chronic health hazards – including cancer –at sensitive receptors in the vicinity of the Project Site. Detailed air dispersion model outputs and risk calculations are presented in Appendices 2.1 through 2.5 of the Project's HRA.

1. Construction Analysis

As part of Project construction, diesel-fueled equipment would operate on-site. Also, diesel-fueled trucks would travel to/from the Project Site to make deliveries of construction materials and equipment and to haul debris from the Site. Diesel-fueled trucks produce DPM emissions, which is a toxic air contaminant and is known to be associated with acute and chronic health hazards – including cancer. The receptor location with the greatest potential exposure to Project construction-related DPM emissions is an existing residence located at 2045 Citron Court, approximately 6,666 feet west of the Project Site (see Figure 4.2-10). At this receiver location, the maximum incremental cancer risk attributable to the Project is 0.03 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million (Urban Crossroads, 2022b, p. 23). Also, the non-cancer risk health index would be <0.01, which would not exceed the SCAQMD non-cancer health risk index threshold of 1.0 (ibid.). Project construction would not directly cause or contribute in a cumulatively-considerable manner to the exposure of receptors near the Project Site to substantial DPM emissions. Impacts would be less than significant.

2. Operational Analysis

The Project does not include any uses that would generate fixed, stationary point-sources of air pollutant emissions. Thus, the Project operations would not directly produce toxic air contaminants. However, operation of the Project would generate/attract diesel-fueled truck traffic. Diesel-fueled trucks produce DPM, which is a toxic air contaminant associated with carcinogenic and non-carcinogenic health hazards. Project-related DPM health risks are summarized below.

At the maximally exposed individual receptor (MEIR) for operational emissions, which is a residence located at 2045 Citron Court (see Figure 4.2-10), the maximum incremental cancer risk attributable to Project-related DPM emissions is calculated to be 0.04 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million (Urban Crossroads, 2022b, p. 24). The non-cancer health risk index at the MEIR

is estimated to be <0.01, which would not exceed the SCAQMD non-cancer health risk index threshold of 1.0 (ibid.). All other residential locations in the general vicinity of the Project Site would be exposed to lower concentrations of Project-related DPM emissions than the MEIR due to their increased distance from Project-related truck activity and/or prevalent local wind patterns and, therefore, would be exposed to lesser risk than the MEIR identified above (ibid.). The Project would not directly cause or contribute to a cumulatively-considerable manner to the exposure of residential receptors near the Project Site to substantial DPM emissions. Impacts to residential receptors would be less than significant.

At the maximally exposed individual worker (MEIW), the warehouse facility located approximately 191 feet west of the Project Site (see Figure 4.2-10), the maximum incremental cancer risk attributable to the DPM emissions from trucks traveling to/from the Project Site is calculated to be 0.10 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million (Urban Crossroads, 2022b, p. 25). The non-cancer health risk index at the MEIW is estimated to be <0.01, which would not exceed the SCAQMD non-cancer health risk index threshold of 1.0 (ibid.). All other places of business in the general vicinity of the Project Site would be exposed to lower concentrations of Project-related DPM emissions than the MEIW due to their increased distance from Project-related truck activity and/or prevalent local wind patterns and, therefore, would be exposed to lesser risk than the MEIW identified above (ibid.). The Project would not directly cause or contribute to a cumulatively-considerable manner to the exposure of worker receptors near the Project Site to substantial DPM emissions. Impacts to worker receptors would be less than significant.

No schools are located within 0.25-mile (1,320 feet) of the Project Site. The nearest school to the Project Site is the Packinghouse Christian Academy, which is located approximately 0.7-mile (3,600 feet) southeast of the Site. DPM concentrations are highest within 300 feet of the emissions source; approximately 70 percent of DPM emissions settle from the air within 500 feet of the source and approximately 80 percent of DPM emissions settle from the air within 1,000 feet from the source (Urban Crossroads, 2022b, p. 25). Because there are no schools within at least 1,320 of the Project Site, operations on the Project Site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of school child receptors near the Project site to substantial DPM emissions (ibid.). Notwithstanding the preceding discussion, Project trucks are expected to utilize a travel route (i.e., San Bernardino Avenue) that is located proximate to the Packinghouse Christian Academy. Project truck traffic would expose students at these schools to a maximum cancer risk of <0.18 in one million, which would not exceed the significance threshold of 10 in one million, and a maximum non-cancer risk of <0.01, which would not exceed the significance threshold of 1.0 (ibid.). The Project would not directly cause or contribute to a cumulatively-considerable manner to the exposure of school child receptors to substantial DPM emissions. Impacts to school child receptors would be less than significant.

3. Total Exposure Analysis

The receptor location with the greatest potential total exposure to Project construction- and operational-related DPM emissions is an existing residence located at 2045 Citron Court, approximately 6,666 feet west of the Project Site. At this receiver location, the maximum incremental cancer risk attributable to the Project is 0.05 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million (Urban Crossroads, 2022b, p. 25). Also, the non-cancer risk health index would be <0.01, which would not exceed

the SCAQMD non-cancer health risk index threshold of 1.0 (ibid.). Project construction would not directly cause or contribute in a cumulatively-considerable manner to the exposure of receptors near the Project Site to substantial DPM emissions. Impacts would be less than significant.

Threshold "d:" Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

During construction activities on the Project Site, odors could be produced by construction equipment exhaust or from the application of asphalt and/or architectural coatings. However, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project Site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. (Urban Crossroads, 2022a, pp. 59-60) Accordingly, the Project's construction would not create objectionable odors affecting a substantial number of people and all impacts would be less than significant.

During long-term operation, Project would operate as a warehouse distribution facility, which is not typically associated with the emission of objectionable odors. Temporary outdoor refuse storage could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations, thereby precluding any significant odor impact. Furthermore, the occupant(s) of the proposed warehouse building would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation. (Urban Crossroads, 2022a, pp. 59-60) As such, long-term operation of the Project would not create objectionable odors affecting a substantial number of people and all impacts would be less than significant.

4.2.6 Cumulative Impact Analysis

The area immediately surrounding the Project Site contains a variety of uses, including vacant parcels and parcels developed (or under construction) with industrial and public facility (landfill and water quality treatment plant) uses. Due to the proximity of I-10, SR-210, and the San Bernardino International Airport, which are generally not compatible with residential land uses due to air pollution concerns, the County has designated the Redlands Donut Hole for industrial land uses.

The census tract containing the Project Site is in the 94th percentile for pollution burden which, based on the census tract's demographic characteristics, results in the OEHHA ranking the area within the 72nd percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022). As part of their *MATES-V* study, SCAQMD estimates the Project area is located within the 78th percentile for cancer risk within the SCAB (which is an improvement from the *MATES-IV* study six years prior that found the Project area to be in the 93rd percentile for cancer risk) (SCAQMD, 2022). Thus, although air pollutant levels in the Project area remain elevated, the observed trend is of improving air conditions.

As discussed under the analysis for Threshold "a," the Project would be consistent with the *2016 AQMP*; therefore, there is no potential for the Project to result in a cumulatively considerable effect on the environment due to an inconsistency with the *2016 AQMP*.

Based on SCAQMD guidance, any exceedance of a regional or localized threshold for criteria pollutants also is considered to be a cumulatively-considerable effect, while air pollutant emissions that fall below applicable regional and/or localized thresholds are not considered cumulatively-considerable. As discussed in the analysis under Thresholds "b" and "c" the Project would not emit any air pollutants during construction or operation that exceed the applicable SCAQMD regional or localized threshold and, thus, the Project would result in effects to regional and local air quality that would not be cumulatively considerable.

As indicated in the analysis of Threshold "d," above, there are no Project components that would expose a substantial number of sensitive receptors to objectionable odors. There are no known sources of offensive odors in the Project area. Because the Project's construction and operation would not create substantial and objectionable odors, there is no potential for odors from the Project Site to commingle with odors from nearby development projects and expose sensitive receptors to substantial, offensive odors. Accordingly, implementation of the Project would result in a less than significant cumulative impact related to odors.

4.2.7 Significance of Impacts Before Mitigation

Threshold "a:" Less than Significant Impact. The Project would neither contribute to a delay in the attainment of federal and State air quality standards in the SCAB nor exceed local growth projections. Accordingly, the Project would not conflict with or obstruct implementation of the *2016 AQMP*.

Threshold "b:" Less than Significant Impact. Project construction and operational activities would not exceed the applicable SCAQMD regional threshold for any criteria pollutant. Thus, the Project would not contribute to cumulatively considerable levels of any air pollutant for which the SCAB does not attain federal or State air quality standards.

Threshold "c:" Less than Significant Impact. Implementation of the Project would not: 1) exceed applicable SCAQMD localized criteria pollution emissions thresholds during construction and operation; 2) would not expose sensitive receptors to toxic air contaminants (i.e., DPM) that exceed the applicable SCAQMD carcinogenic and non-carcinogenic risk thresholds; and 3) would not cause or contribute to the formation of a CO "hot spot."

Threshold "d:" Less than Significant Impact. The Project would not produce air emissions that would lead to unusual or substantial construction-related or operational-related odors. The Project is required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance.

4.2.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.3 BIOLOGICAL RESOURCES

This Subsection evaluates the potential for Project-related activities to impact sensitive biological resources on or adjacent to the Project Site. The analysis in this Subsection is based, primarily, on information contained in a report ("Biology Report") prepared by Alden Environmental, Inc. (hereinafter, "Alden"). This report, titled "Nevada Street Industrial Project Biological Resources" and dated August 11, 2022, is provided as *Technical Appendix D* to this EIR (Alden, 2022). All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.3.1 EXISTING CONDITIONS

A. Vegetation Communities and Land Cover Types

The Project's impact area contains one vegetation community (non-native grassland) and two land cover types (disturbed and developed land) under existing conditions. A summary of the vegetation community and land cover types on the Project Site is provided below.

- Non-Native Grassland: Non-native grassland covers a majority of the Project Site, covering approximately 16.9 acres. This community is comprised of non-native grasses (ripgut grass [*Bromus diandrus*], red brome [*Bromus rubens*], schismus [*Schismus barbatus*], and soft chess [*Bromus hordeaceus*]. Non-native grassland is not a sensitive or natural vegetation community. (Alden, 2022, p. 3)

- Disturbed: The Project Site contains approximately 1.1 acres of disturbed area. The disturbed habitat is located at the northwest corner of the Project Site and is sparsely vegetated, although plant species such as Russian thistle (*Salsola tragus*), lamb's quarters (*Chenopodium album*), tree tobacco (*Nocotiana glauca*), and cheeseweed (*Malva parvifolia*) were observed. The disturbed area on the Project Site is not a sensitive or natural vegetation community. (Alden, 2022, p. 3)

- Developed: Nevada Street, which abuts the Project Site on the west, is classified as "developed." The Project would provide improvements to approximately 0.3-acre of paved area within the Nevada Street right-of-way. The developed area adjacent to the Project Site is not a sensitive or natural vegetation community. (Alden, 2022, p. 4)

B. Special-Status Plant Species

According to research of rare and native plant databases, nine (9) special-status plant species are known to occur in the vicinity of the Project Site: California spineflower (*Mucronea californica*), Marsh sandwort (*Arenaria paludicola*), Nevin's barberry (*Berberis nevinii*), Parish's bush-mallow (*Malaothamnus parishii*), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), Sal marsh bird's beak (*Chloropyron maritinum* ssp. *maritinum*), San Diego ambrosia (*Ambrosia pumila*), Santa Ana River wooly-star (*Eriastrum densifolium* ssp. *sanctorum*), and Slender-horned spineflower (*Dodecahema leptoceras*). No special-status plant species were observed on the Project Site and none of the above-listed plant species are expected to occur on the Project Site due to the lack of requisite natural vegetation communities and soil conditions as well as pervasive, historic ground disturbances on the Project Site. See Attachment A from the Project's Biology Report for the full list of plant species observed on the Project Site. (Alden, 2022, pp. 2, 4-5)

C. Special-Status Wildlife Species

Three reptile, 35 avian, and four mammal species were observed on the Project Site, two of which are classified as special-status species: coastal (tiger) whiptail (*Aspidoscelis tigris stejnegeri*) and American peregrine falcon (*Falco peregrinus anatum*). Refer to Attachment B from the Project's Biology Report for the full list of wildlife species observed on the Project Site.

The coastal whiptail is a California Department of Fish and Wildlife (CDFW) Species of Special Status Concern that is associated with open coastal sage scrub, chapparal, and woodland habitat between southern Ventura County and south-central Baja California. Important habitat components for the coastal whiptail include open, sunny areas, shrub cover with accumulated leaf litter, and an abundance of insects, spiders, or scorpions. (Alden, 2022, p. 5)

The American peregrine falcon is a CDFW Fully Protected Species that is found throughout much of North America. The American peregrine falcon nests on cliff ledges located near water sources where prey (i.e., shorebirds) are concentrated. Preferred hunting areas are agricultural fields, meadows, marshes, and lakes. The American peregrine falcon was likely present on the Project Site due to the presence of surface ponds at the Rialto Wastewater Treatment Plant, which abuts the Project Site on the north and has attracted mallard (*Anas platyrhynchos*) and cinnamon teal (*Spatula Cyanoptera*) to the Project area. (Alden, 2022, p. 5)

According to research of rare and sensitive animal databases, 19 special-status animal species not observed on the Project Site have been recorded in the vicinity of the Site: Burrowing owl (*Athene cunicularia*), Monarch butterfly (*Danaus plexippus*), Santa Ana sucker (*Catostomus santaanae*), Steelhead (*Oncorhynchus mykiss irideus*), California glossy snake (*Arizona elegans occidentalis*), Coast horned lizard (*Phrynosoma blainvillii*), Coastal California gnatcatcher (*Polioptila californica californica*), Least Bell's vireo (*Vireo belli pusillus*), Southwestern willow flycatcher (*Empidonax trailli extimus*), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*), Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), Pocketed free-tailed bat (*Nyctinomops femorsaccus*), San Bernardino kangaroo rat (*Dipodomys merriami parvus*), Stephens' kangaroo rat (*Dipodomys stephensi*), Western mastiff bat (*Eumops perotis californicus*), Golden eagle (*Aquila chrysaetos*), Swainson's hawk (*Buteo swainsoni*), Northern harrier (*Circus hudonius*), White-tailed kite (*Elanus leucurus*), and Bald eagle (*Haliaetus leucocephalus*). The Project Site contains suitable habitat for the burrowing owl; however, this species was not observed on the Project Site during a focused breeding season survey conducted in 2022 (Alden, 2022, p. 5). Based on the lack of suitable habitat on the Project Site, none of the remaining above-listed special-status animal species are expected to occur on the Project Site (Alden, 2022, pp. 6-8). Refer to the Project's Biology Report for a detailed explanation of the reasons why the Project is unlikely to be used by the above-listed special-status animal species.

D. Nesting Birds

The Project Site contains groundcover, shrubs, and trees that could be used for nesting or roosting by a variety of native and/or migratory avian species. While there were no nests observed on the Project Site, birds could build nests in the vegetation present on the Project Site (Alden, 2022, p. 10).

E. Wetlands

The Project Site was inspected for riparian/riverine and vernal pool resources, as well as any features that have potential to be considered Waters of the U.S. (WUS) or Waters of the State (WS) under the jurisdiction of the U.S. Army Corps of Engineers (Corps) and/or California Department of Fish and Wildlife (CDFW), respectively; however, the property is essentially flat and there are no drainage features, ponding areas, or wetland/riparian resources that could be considered a WUS or WS within or adjacent to the Site. (Alden, 2022, p. 10)

4.3.2 Regulatory Setting

The Project Site is subject to State of California (hereinafter, "State") and federal regulations that were developed to protect natural resources, including: state and federally listed plants and animals; aquatic resources including rivers and creeks, ephemeral streambeds, wetlands, and areas of riparian habitat; other special-status species which are not listed as threatened or endangered by the State or federal governments; and other special-status vegetation communities. Provided below is an overview of the federal, State, and regional laws, regulations, and requirements that are applicable to the property. Provided below is an overview of the federal, State, and regional laws, regulations, and requirements that are applicable to the Project Site based on its location and the biological resources observed on the Site by Alden.

A. Federal Plans, Policies, and Regulations

1. Endangered Species Act (ESA)

The purpose of the federal Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend (USFWS, 2017). It is administered by the U.S. Fish and Wildlife Service (USFWS) and the Commerce Department's National Marine Fisheries Service (NMFS). The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife such as whales and anadromous fish such as salmon. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. All species of plants and animals, except pest insects, are eligible for listing as endangered or threatened.

The ESA makes it unlawful for a person to take a listed animal without a permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct." Through regulations, the term "harm" is defined as "an act which actually kills or injures wildlife. Such an act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Listed plants are not protected from take, although it is illegal to collect or maliciously harm them on federal land. Protection from commercial trade and the effects of federal actions do apply for plants.

Section 7 of the ESA requires federal agencies to use their legal authorities to promote the conservation purposes of the ESA and to consult with the USFWS and NMFS, as appropriate, to ensure that effects of actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of listed species.

During consultation, the "action" agency receives a "biological opinion" or concurrence letter addressing the proposed action. In the relatively few cases in which the USFWS or NMFS makes a jeopardy determination, the agency offers "reasonable and prudent alternatives" about how the proposed action could be modified to avoid jeopardy. It is extremely rare that a project ends up being withdrawn or terminated because of jeopardy to a listed species.

Section 10 of the ESA may be used by landowners including private citizens, corporations, tribes, states, and counties who want to develop property inhabited by listed species. Landowners may receive a permit to take such species incidental to otherwise legal activities, provided they have developed an approved habitat conservation plan (HCP). HCPs include an assessment of the likely impacts on the species from the proposed action, the steps that the permit holder will take to avoid, minimize, and mitigate the impacts, and the funding available to carry out the steps. HCPs may benefit not only landowners but also species by securing and managing important habitat and by addressing economic development with a focus on species conservation.

2. Migratory Bird Treaty Act (16 USC Section 703-712)

The Migratory Bird Treaty Act (MBTA) makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations (USFWS, 2020a). The migratory bird species protected by the MBTA are listed in 50 CFR 10.13. The USFWS has statutory authority and responsibility for enforcing the MBTA (16 U.S.C. 703-712). The MBTA implements Conventions between the United States and four countries (Canada, Mexico, Japan, and Russia) for the protection of migratory birds.

B. State Plans, Policies, and Regulations

1. California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved (CDFW, n.d.). The California Department of Fish and Wildlife (CDFW) works with interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. CDFW may authorize the take of any such species if certain conditions are met.

Section 2081 subdivision (b) of the California Fish and Game Code (CFGC) allows CDFW to authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met. These authorizations are commonly referred to as incidental take permits (ITPs).

If a species is listed by both the federal ESA and CESA, CFGC Section 2080.1 allows an applicant who has obtained a federal incidental take statement (federal Section 7 consultation) or a federal incidental take permit

(federal Section 10(a)(1)(B)) to request that the Director of CDFW find the federal documents consistent with CESA. If the federal documents are found to be consistent with CESA, a consistency determination (CD) is issued and no further authorization or approval is necessary under CESA.

A Safe Harbor Agreement (SHA) authorizes incidental take of a species listed as endangered, threatened, candidate, or a rare plant, if implementation of the agreement is reasonably expected to provide a net conservation benefit to the species, among other provisions. SHAs are intended to encourage landowners to voluntarily manage their lands to benefit CESA-listed species. California SHAs are analogous to the federal safe harbor agreement program and CDFW has the authority to issue a consistency determination based on a federal safe harbor agreement.

2. Natural Community Conservation Planning Act (NCCP)

CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity (CDFW, n.d.). The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and Federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in number significantly.

An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP. CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP participants.

There are currently 14 approved NCCPs (includes 6 subarea plans) and more than 20 NCCPs in the active planning phase (includes 10 subarea plans), which together cover more than 7 million acres and will provide conservation for nearly 400 special status species and a wide diversity of natural community types throughout California. The Project Site is not located within an area covered by an approved NCCP or an NCCP in the active planning phase (CDFW, n.d.).

3. Native Plant Protection Act (NPPA) of 1977

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered (CDFW, n.d.). There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations.

4. Unlawful Take or Destruction of Nests or Eggs (CFGC Sections 3503.5-3513)

Section 3503.5 of the CFGC specifically protects birds of prey, stating: “It is unlawful to take, possess, or destroy any . . . [birds-of-prey] or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto” (CA Legislative Info, n.d.).

Section 3513 of the CFGC duplicates the federal protection of migratory birds, stating: "It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act" (ibid.).

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Natural Resources Element of the Countywide Plan sets forth goals and policies related to the protection of biological resources. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Goal NR-5: Biological Resources. An interconnected landscape of open spaces and habitat areas that promotes biodiversity and healthy ecosystems, both for their intrinsic value and for the value placed on them by residents and visitors.

Policy NR-5.5 Mitigation and future responsibilities. We require that new development satisfy habitat conservation responsibilities without shifting conservation responsibilities onto military property.

Policy NR-5.7 Development review, entitlement, and mitigation. We comply with state and federal regulations regarding protected species of animals and vegetation through the development review, entitlement, and environmental clearance processes.

Policy NR-5.8 Invasive species. We require the use of non-invasive plant species with new development and encourage the management of existing invasive plant species that degrade ecological function.

4.3.3 Basis for Determining Significance

The State Legislature has established it to be the policy of the State of California to "[p]revent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities..." (Public Resources Code Section 21001(c)). CEQA Guidelines Section 15065(a) establishes that a project may have a significant effect where:

> *"The project has 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 wildlife community, reduce the number or restrict the range of an endangered, rare, or threatened species ..."*

Appendix G of the CEQA Guidelines is more specific in addressing biological resources and encompasses a broader range of resources to be considered, including: candidate, sensitive, or special status species; riparian habitat or other sensitive natural communities; federally-protected wetlands; fish and wildlife movement corridors; local policies or ordinances protecting biological resources; and, adopted Habitat Conservation Plans

(HCPs). Accordingly, for the purpose of analysis in this EIR, the proposed Project would result in a significant impact to biological resources if the Project or any Project-related component would:

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

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service;*

c. *Have a substantial adverse effect on State- or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;*

e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or*

f. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

4.3.4 Methodology for Evaluating Biological Resources Impacts

The biological resources impacts assessment is based on literature review, including a review of the California Natural Diversity Data Base (CNDDB), historical and current aerial photographs, USGS topographic maps, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey maps, the National Hydrography Dataset, and National Wetlands Inventory, and a visit to the Project Site where existing biological resources on and adjacent to the Project Site were mapped. Refer to the Project's Biology Report for detailed descriptions of the Project Site survey dates, scopes of study, and research and survey methodologies used in the biological resources analysis. (Alden, 2022, pp. 1-3)

4.3.5 IMPACT ANALYSIS

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

A. Direct Impacts to Special-Status Plants

No special-status plants were observed on the Project Site by Alden biologists during field surveys and, due to the disturbed nature of the Project Site and the lack of natural plant communities on or adjacent to the Site, the Project Site does not have potential to support special-status plant species known to occur in the general Project area (Alden, 2022, pp. 3-5). No impacts to special-status plant species would occur.

B. Direct Impacts to Special-Status Wildlife

Alden observed two special-status wildlife species on the Project Site: coastal (tiger) whiptail and American peregrine falcon.

There is potential for potential injury or mortality to coastal (tiger) whiptail individuals during Project construction; however, the species remains relatively common in southern California and potential impacts resulting from the Project would not substantially affect the regional sustainability of the species because neither the Project Site nor the surrounding area contain typical habitat for the species, which suggests the population on the Site is very small (Alden, 2022, p. 11). In addition, the species is classified as a CDFW "Species of Special Concern," which indicates the species' population and/or range has declined from historic levels; this classification does not prohibit the incidental loss of this species from land development because the loss of limited number of this species would not hinder the species' ability to self-sustain (ibid.). Accordingly, potential impacts to the coastal (tiger) whiptail would be less than significant.

The Project is not expected to result in any impacts to the American peregrine falcon because the species is associated with the Rialto Wastewater Treatment Plant facility that abuts the Project Site on the north – by hunting the waterfowl that are attracted to the surface ponds at the facility – and the species does not utilize the Project Site for nesting (Alden, 2022, p. 11). Accordingly, no impact would occur to the American peregrine falcon.

Although no burrowing owl individuals or signs of burrowing owl use were observed on the Project Site during focused breeding season surveys conducted by Alden, the burrowing owl is a roaming species and the subject property contains marginally-suitable habitat for the species (Alden, 2022, p. 11). Accordingly, there is the potential for the species to occupy the Project Site prior to the start of construction. If burrowing owls are present on the Project Site at the time construction activities commence, potential impacts to the species would be significant and mitigation would be required.

As noted under subsection 4.3.1C, there are 18 other special-status wildlife species known to occur in the vicinity of the Project Site; however, none of these species are expected to use the Project Site due to the lack

of suitable habitat on the Site and ongoing human activities on and adjacent to the Site. Accordingly, the Project would not result in substantial, adverse effects to any other special-status wildlife species.

C. Indirect Impacts to Special-Status Biological Resources

The Project Site is highly disturbed under existing conditions and the Site is surrounded by developed, urban land uses. No natural or open spaces are located adjacent to the Project Site and it is unlikely that special-status plants or wildlife species occur within areas adjacent to the Site due to high levels of disturbance and ongoing human activity. Due to the lack of natural, undisturbed habitat surrounding the Project Site and the unlikely presence of listed or special-status plant or wildlife species in areas abutting the Site, the Project would not result in indirect impacts to listed or special-status biological resources.

The Project Site is in area that is surrounded by existing development with habitat conditions very similar to those that exist on the Project Site. There are no native open space areas adjacent to the Project Site and no listed or special-status plant or wildlife species are expected to occur within the developed and disturbed areas abutting the site. Due to the lack of natural, undisturbed habitat surrounding the Project Site and the unlikely presence of listed or special-status plant or wildlife species in areas abutting the site, the Project would not result in indirect impacts to listed or special-status biological resources.

Threshold b:	***Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?***

Based on field surveys conducted on the Project Site no riparian habitat is present on the Project Site and, as noted previously under subsection 4.3.1A, none of the vegetation communities or land cover types observed on or abutting the Project Site (i.e., non-native grassland, disturbed, developed) are classified as a sensitive or natural community (Alden, 2022, pp. 3-4, 10). Implementation of the Project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or the USFWS; no impact would occur.

Threshold c:	***Would the Project have 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?***

The Project Site does not contain any protected wetland or aquatic resources, including, but not limited to, natural drainages or water courses, wetland habitat, marsh, vernal pools, or coastal resources (Alden, 2022, pp. 10, 12). As such, the Project would not have a substantial adverse effect on State- or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. No impact would occur.

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

The Project Site does not contain natural, surface drainage/watercourse or ponding features. Additionally, there are no water bodies on or abutting the Project Site that could support fish. Therefore, there is no potential for the Project to interfere with the movement of native resident or migratory fish. The Project Site also does not serve as a wildlife corridor nor is it connected to an established corridor, and there are no native wildlife nurseries on or adjacent to the Site. Therefore, there is no potential for the Project to impede the use of a native wildlife nursery site. (Alden, 2022, p. 10) Based on the foregoing information, the Project would result in no impact to any native resident or migratory fish, established wildlife corridor, or native wildlife nursery sites.

The Project would remove vegetation (i.e., trees, shrubs, and grasses) from the Project Site that serves as provides potential roosting and nesting habitat for birds common to the Inland Empire area, although no nests were observed on the Project Site and no birds are known to nest on the Site (Alden, 2022, pp. 5, 8-10). As noted previously, numerous non-sensitive bird species were observed on the Project Site, including but not limited to Anna's hummingbird, house finch, American crow, raven, and Eurasian collared dove. Although these species are not considered special-status or sensitive based on their prevalence in southern California, the MBTA and California Fish and Game Code are in place to protect these bird species, among others, while nesting. If Project construction is to occur during the avian nesting season (February 15 – September 1) and if active nests are present on the Project Site, significant impacts to nesting birds could occur. The Project's to impact nesting birds is a potentially significant impact for which mitigation is required.

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

San Bernardino County does not have any policies or ordinances in place to protect biological resources that are applicable to the Project or Project Site. Accordingly, no impact would occur.

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

The Project Site is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (CDFW, n.d.). Therefore, no impact would occur.

4.3.6 Cumulative Impact Analysis

This cumulative impact analysis for biological resources considers development of the Project in conjunction with other development projects in the vicinity of the Project Site as well as full buildout of surrounding unincorporated area and the cities of Redlands, San Bernardino, and Loma Linda.

The Project Site does not contain any special-status plant species nor does the Site have the potential to support such species. Therefore, the Project would not impact any special-status plant species and, thus, the Project would have no potential to contribute to a cumulative impact to special-status plant species.

With the exception of the burrowing owl, implementation of the Project would not contribute to a substantial adverse cumulative impact to special-status wildlife species because the only species with the potential to be affected by implementation of the Project (i.e., the coastal [tiger] whiptail) features a relatively healthy regional population and likely only occurs in small numbers within the cumulative study area due to the lack of preferred habitat. Thus, any cumulative loss of the coastal (tiger) whiptail in the local area is not expected to result in substantial adverse effects to the regional sustainability of the species.

Regarding the burrowing owl, this species is commonly found within the Project vicinity; as such, it is reasonable to conclude that impacts to the burrowing owl habitat could occur in conjunction with development of other properties in the cumulative study area. Because the Project Site contains habitat suitable for use by the burrowing owl, implementation of the Project has the potential to contribute to a cumulatively considerable impact to the burrowing owl.

The Project would not impact any riparian or sensitive natural communities; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact to these resources.

The Project would not impact any State-protected or federally-protected wetlands. Accordingly, the Project has no potential to contribute to a cumulatively considerable impact to State or federally protected wetlands.

The Project would remove vegetation from the Project Site that has the potential to support nesting birds protected by federal and State regulations. A wide range of habitat and vegetation types have the potential to support nesting birds; therefore, it is likely that other development projects within the cumulative study area also may impact nesting birds. Thus, the Project has the potential to contribute to a cumulatively considerable impact to nesting birds.

The Project would not conflict with any local policies or ordinances protecting biological resources. Other development projects in the cumulative study area would be required to comply with applicable local policies and/or ordinances related to the protection of biological resources as a standard condition of review/approval. Because the Project and cumulative development would be prohibited from violating applicable, local policies or ordinances related to the protection of biological resources, a cumulatively considerable impact would not occur.

The Project Site is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Because there is no conservation plan applicable to the Project impact area, there is no potential for the Project to contribute to the violation of a conservation plan. No cumulative impact would occur.

4.3.7 Significance of Impacts Before Mitigation

Threshold a: Potential Significant Direct and Cumulatively Considerable Impact. The Project Site contains suitable habitat for the burrowing owl. In the event the burrowing owl is present on the Project Site at the time construction commences, implementation of the Project has the potential to result in the mortality of burrowing owl individuals.

Threshold b.: No Impact. The Project Site does not contain riparian and/or other sensitive natural habitats; therefore, the Project would have no impact on riparian or other sensitive habitats as classified by the CDFW or USFWS.

Threshold c: No Impact. No State- or federally-protected wetlands are located on the Project Site; therefore, no impact to wetlands would occur.

Threshold d: Potential Significant Direct and Cumulatively Considerable Impact. There is no potential for the Project to interfere with the movement of fish or impede the use of a native wildlife nursery site. However, the Project has the potential to impact nesting migratory birds protected by the MBTA and California Fish and Game Code, should habitat removal occur during the nesting season and should nesting birds be present.

Threshold e: No Impact. The Project would not conflict with any local policies or ordinances protecting biological resources.

Threshold f: No Impact. The Project impact area is not located within the boundaries of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur.

4.3.8 Mitigation

The following mitigation measures address the Project's potential to impact the burrowing owl:

MM 4.3-1 Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by San Bernardino County prior to the issuance of a grading permit and subject to the following provisions:

a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction.

b) In the event that the pre-construction survey identifies the presence of the burrowing owl on the Project Site, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows,

will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

The following mitigation measures would address the potential for Project construction to impact nesting birds, including migratory species.

MM 4.3-2 Vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (January 31 through September 1), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a) A nesting bird survey shall be conducted on the Project Site and within suitable habitat located within a 500-foot radius of the Project Site by a qualified biologist within three days prior to initiating vegetation clearing or ground disturbance.

b) If the survey identifies the presence of active nests, then the nests shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (i) the adult birds have not begun egg-laying and incubation; or (ii) the juveniles from the occupied nests are capable of independent survival.

c) If the biologist is not able to verify any of the conditions from sub-item "b," above, then no disturbance shall occur within a buffer zone specified by the qualified biologist for each nest or nesting site. The buffer zone shall be species-appropriate (no less than 100-foot radius around the nest for non-raptors and no more than a 500-foot radius around the nest for raptors) and shall be sufficient to protect the nest from direct and indirect impacts from construction activities. The size and location of buffer zones, if required, shall be based on consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service and shall be subject to review and approval by San Bernardino County. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist, with County concurrence, verifies that the nests are no longer occupied and/or juvenile birds can survive independently from the nests.

4.3.9 Significance of Impacts After Mitigation

Threshold a: Less than Significant Impact with Mitigation. Implementation of MM 4.3-1 would ensure that pre-construction surveys are conducted for the burrowing owl to determine the presence or absence of the species on the Project Site. If present, the mitigation measure provides performance criteria that requires avoidance and/or relocation of burrowing owls in accordance with CDFW protocol. With implementation of

the required mitigation, potential direct and cumulatively considerable impacts to the burrowing owl would be reduced to below a level of significance.

Threshold d: Less than Significant Impact with Mitigation. Implementation of MM 4.3-2 would ensure that pre-construction surveys are conducted for nesting birds protected by State and federal regulations in the event that vegetation is removed from the Project Site during the breeding season. If nesting birds are present on the Project Site, the mitigation requires avoidance of active bird nests in conformance with accepted protocols and regulatory requirements. With implementation of the required mitigation, potential direct and cumulatively considerable impacts to nesting birds protected by State and federal regulations would be reduced to below a level of significance.

4.4 CULTURAL RESOURCES

The analysis in this Subsection is based on a cultural resources report prepared by Brian F. Smith and Associates, Inc. (hereinafter, "BFSA"). This report, titled "A Cultural Resources Study for the Nevada Street Project" and dated October 26, 2022 (BFSA, 2022a), is included as *Technical Appendix E* to this EIR.

Confidential information has been redacted from *Technical Appendix E* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County, and BFSA is considered confidential in respect to places that may have traditional tribal cultural significance (Gov. Code Section 65352.4), and although relied upon in part for the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (Cal. Code Regs. Section 15120(d)).

4.4.1 EXISTING CONDITIONS

A. Prehistoric and Protohistoric Resources

1. Regional Setting

The Project Site is located within an area of California referred to as the Inland Empire. The Paleo Indian Period, Archaic Period, and Late Prehistoric Period are the three (3) general prehistoric cultural periods represented in the Inland Empire, the resources of which that have likely potential for discovery are summarized briefly below. Refer to *Technical Appendix E* for a more detailed discussion about the prehistoric cultural periods in the Inland Empire (BFSA, 2022a, p. 1.0-5 through 1.0-12).

- Paleo Indian Period (Late Pleistocene: 11,500 to circa 9,000 years before the present [YBP]): The Paleo Indian Period is associated with the terminus of the late Pleistocene (12,000 to 10,000 YBP). The late Pleistocene environment was cool and moist, allowing for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands; however, by the terminus of the late Pleistocene, the climate became warmer, causing glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. The coastal shoreline at 10,000 YBP, depending upon the particular area of the coast, was near the 30-meter isobath, or two to six kilometers further west than its present location.

- Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP): The Archaic Period of prehistory began with the onset of the Holocene around 9,000 YBP. In southern California, the general climate at the beginning of the early Holocene was marked by cool/moist periods and an increase in warm/dry periods and sea levels. The coastal shoreline at 8,000 YBP, depending upon the particular area of the coast, was near the 20-meter isobath, or one to four kilometers further west than its present location.

- Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790): Approximately 1,350 YBP, a Shoshonean-speaking group from the Great Basin region moved into San Bernardino County, marking the transition to the Late Prehistoric Period. This period has been characterized by higher population

densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics.

The Project Site and general vicinity are within a geographic area where the traditional territories of three Native American groups, the Cahuilla, Serrano, Vanyume (potentially), adjoined and overlapped, at least during the Late Prehistoric and Protohistoric Periods.

At the time of Spanish contact in the 16th century, the Cahuilla occupied territory that included the San Bernardino Mountains, Orocopia Mountain, and the Chocolate Mountains to the east, Salton Sea and Borrego Springs to the south, Palomar Mountain and Lake Mathews to the west, and Santa Ana River to the north. Cahuilla villages were typically permanent and located on low terraces within canyons in proximity to water sources. Each village was associated with a particular lineage and series of sacred sites that included unique petroglyphs and pictographs. Villages were occupied throughout the year; however, during a several-week period in the fall, most of the village members relocated to mountain oak groves to take part in acorn harvesting.

The Serrano and Vanyume were primarily hunter gatherers that lived in individual family dwellings near water sources. The Serrano occupied an area east of present-day Los Angeles: the San Bernardino Mountains east of Cajon Pass and at the base of and north of the mountains near Victorville, east to Twentynine Palms, and south to the Yucaipa Valley. The territory of the Vanyume was covered by small and relatively sparse populations focused along the Mojave River and extending as far southwest as the Cajon Pass and portions of Hesperia.

2. Project Site Conditions

BFSA surveyed the Project Site for the presence of prehistoric and protohistoric archaeological resources. BFSA noted that the entire Project Site was heavily disturbed and appeared to have been rough-graded in the past. Ground visibility on the Site was hindered only by dense, tall grasses. BFSA did not observe any prehistoric or protohistoric resources on the Project Site. (BFSA, 2022a, p. 3.0-1)

BFSA also performed an archaeological records search through the South Central Coastal Information Center (SCCIC) at California State University (CSU), Fullerton. The records search provided information regarding previous archaeological studies in the Project area and any previously recorded sites within a one-half mile radius of the Project site. The results of this records search indicate that no prehistoric or protohistoric artifacts have been recorded on the Project Site or within a one-mile radius of the Site (BFSA, 2022a, p. 1.0-12).

B. Historic Resources

1. Regional Setting

The general historical setting for the southern California region and the Redlands area is summarized below. Refer to *Technical Appendix E* for a more detailed discussion of the local historic setting.

In 1772, three years after the beginning of Spanish colonization of Alta California, Pedro Fages, Comandante of the new province, and a small force of soldiers under his command became the first Europeans to set foot in the San Bernardino Valley. They were followed in the next few years by two other early Spanish explorers, Juan Bautista de Anza and Francisco Garcés, who traveled through the valley in the mid-1770s. Despite these early visits, for the next 40 years the inland valley received little impact from the Spanish colonization activities in Alta California, which were concentrated predominantly in the coastal regions.

Following the establishment of Mission San Gabriel in 1771, the San Bernardino Valley became nominally a part of the vast landholdings of that mission. The name "San Bernardino" was bestowed on the region at least by 1819, when a mission asistencia and an associated rancho were officially established under that name in present-day Loma Linda. After gaining independence from Spain in 1821, the Mexican government began in 1834 the process of secularizing the mission system in Alta California, which in practice meant the confiscation of the Franciscan missions' land holdings, to be distributed later among prominent citizens of the province. During the 1830s and the 1840s, several large land grants were created in the vicinity of present-day Fontana, but most of the Fontana area was not involved in any of these, and thus remained public land when Alta California became a part of the United States in 1848.

Used primarily as cattle ranches, the ranchos around San Bernardino, which included present-day Redlands, saw little development until the mid-19th century, when a group of Mormon settlers from Salt Lake City founded the town of San Bernardino in 1851. After the completion of the Southern Pacific Railroad in the mid-1870s, and especially after the Atchison, Topeka and Santa Fe Railway introduced a competing line in the 1880s, a phenomenal land boom swept through much of southern California, ushering in a number of new settlements in the San Bernardino Valley. The town of Redlands was formed in 1881; E.G. Judson and Frank E. Brown laid out a town site parallel to the slope of a canal they had built from Santa Ana Canyon to Reservoir Canyon located along the path of present-day Interstate 10. The canal was designed to bring water to the area for citrus groves. Judson and Brown named the town Redlands after the dry, red, adobe soil. The City of Redlands incorporated in 1888, combining the towns or Redlands, Lugonia, Brookside, and Crafton.

In the 1890s, due to the downturn in the economic development of the area, only sporadic development of residential lots interspersed with large agricultural fields occurred within Lugonia. Residential development in Redlands at the time was mostly limited to the southern area, south of Redlands Boulevard. During the early twentieth century, Redlands again experienced steady population growth. More than two dozen packinghouses and over 15,000 acres of citrus groves earned Redlands, along with much of the Inland Empire, the reputation as the navel orange capital of the world. However, everything changed in early January 1913, when a three-day-long cold spell referred to simply as "the Freeze" devastated most of the area's citrus groves. Almost the season's entire orange crop was ruined, except for fruit from the very few groves with oil-fueled heaters known as smudge pots. The loss of the crop led to a decline in business, property values, residential

growth, and tourism, which impacted the Redlands population and economy. By the 1920s, Redlands had re-established its dominance in the citrus industry. New groves were planted and more packinghouses and industrial properties were developed. The citrus industry continued to thrive until after World War II, when land values began to make it more worthwhile to develop properties into residential subdivisions. Since the mid-twentieth century, the older citrus groves have steadily given way to residential and commercial development.

2. Project Site Conditions

The Project Site was vacant land prior to 1901 and from at least 1930 to 1975 was used as an orchard. By 1985, the Project Site was vacant and all trees had been removed. From at least 1989 until 2014, the Project Site was used for agriculture and planted with row crops. Agricultural production on the Project Site ceased in 2014. The northwest corner of the Project Site was used for the storage of dumpster trailers beginning between 2016-2018 and ending in 2021. (V3, 2021, p. 12; Google Earth, 2022)

BFSA conducted a pedestrian survey of the Project Site and reviewed historical records databases to identify the presence or absence of historical resources on the Project Site. The survey of the Project Site did not identify any historic resources within the Site (BFSA, 2022a, p. 3.0-1).

BFSA also performed an archaeological records search through the SCICC at CSU Fullerton. The records search provided information regarding previous archaeological studies in the Project area and any previously recorded sites within a one-half mile radius of the Project Site. The results of this records search indicate that no historic artifacts have been recorded on the Project Site but four historic resources have been recorded within a one-mile radius of the Site; the recorded historic resources include a well and structural pad, a rural historic landscape (of Mexican fan palms), a historic water conveyance system, and a historic farm complex (BFSA, 2021a, p. 1.0-12).

4.4.2 Regulatory Setting

The following is a brief description of environmental laws and related regulations governing archaeological and historic resources.

A. Federal Plans, Policies, and Regulations

1. National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) was passed primarily to acknowledge the importance of protecting our nation's heritage (NPS, 2021a). While Congress recognized that national goals for historic preservation could best be achieved by supporting the drive, enthusiasm, and wishes of local citizens and communities, it understood that the federal government must set an example through enlightened policies and practices. In the words of the Act, the federal government's role would be to "provide leadership" for preservation, "contribute to" and "give maximum encouragement" to preservation, and "foster conditions under which our modern society and our prehistoric and historic resources can exist in productive harmony."

NHPA and related legislation sought a partnership among the federal government and the states that would capitalize on the strengths of each. The federal government, led by the National Park Service (NPS) provides funding assistance; basic technical knowledge and tools; and a broad national perspective on America's heritage. The states, through State Historic Preservation Officers (SHPOs) appointed by the governor of each state, would provide matching funds, a designated state office, and a statewide preservation program tailored to state and local needs and designed to support and promote state and local historic preservation interests and priorities.

An Advisory Council on Historic Preservation (ACHP), the first and only federal entity created solely to address historic preservation issues, was established as a cabinet-level body of Presidentially-appointed citizens, experts in the field, and federal, state, and local government representatives, to ensure that private citizens, local communities, and other concerned parties would have a forum for influencing federal policy, programs, and decisions as they impacted historic properties and their attendant values.

Section 106 of NHPA granted legal status to historic preservation in federal planning, decision-making, and project execution. Section 106 requires all federal agencies to take into account the effects of their actions on historic properties, and provide ACHP with a reasonable opportunity to comment on those actions and the manner in which federal agencies are taking historic properties into account in their decisions.

A number of additional executive and legislative actions have been directed toward improving the ways in which all federal agencies manage historic properties and consider historic and cultural values in their planning and assistance. Executive Order 11593 (1971) and, later, Section 110 of NHPA (1980, amended 1992), provided the broadest of these mandates, giving federal agencies clear direction to identify and consider historic properties in federal and federally assisted actions. The National Historic Preservation Amendments of 1992 further clarified Section 110 and directed federal agencies to establish preservation programs commensurate with their missions and the effects of their authorized programs on historic properties.

2. National Register of Historic Places (NRHP)

The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation (NPS, 2021b). Authorized by the NHPA of 1966, the NPS's National Register of Historic Places (NRHP) is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources.

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property’s age, integrity, and significance, as follows:

- Age and Integrity. Is the property old enough to be considered historic (generally at least 50 years old) and does it still look much the way it did in the past?
- Significance. Is the property associated with events, activities, or developments that were important in the past? With the lives of people who were important in the past? With significant architectural history, landscape history, or engineering achievements? Does it have the potential to yield information through archaeological investigation about our past?

Nominations can be submitted to a SHPO from property owners, historical societies, preservation organizations, governmental agencies, and other individuals or groups. The SHPO notifies affected property owners and local governments and solicits public comment. If the owner (or a majority of owners for a district nomination) objects, the property cannot be listed but may be forwarded to the NPS for a Determination of Eligibility (DOE). Listing in the NRHP provides formal recognition of a property's historical, architectural, or archaeological significance based on national standards used by every state.

Under Federal Law, the listing of a property in the National Register places no restrictions on what a non-federal owner may do with their property up to and including destruction, unless the property is involved in a project that receives Federal assistance, usually funding or licensing/permitting. National Register listing does not lead to public acquisition or require public access.

3. National Historic Landmarks Program

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States (NPS, 2021c). Today, over 2,600 historic places bear this national distinction. Working with citizens throughout the nation, the NHL Program draws upon the expertise of NPS staff who guide the nomination process for new Landmarks and provide assistance to existing Landmarks.

4. Native American Graves Protection and Repatriation Act (NAGPRA)

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation (NPS, 2021d).

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s).

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archaeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the

Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items.

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee.

B. State Plans, Policies, and Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value" (NPS, n.d.).

2. California Code of Regulations Title 14, Section 1427

California Code of Regulations Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found" (NAHC, n.d.).

3. California Register of Historic Resources

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The Register is the authoritative guide to the state's significant historical and archaeological resources (OHP, n.d.). The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA.

In order for a resource to be included on the Register of Historic Resources, the resources must meet one of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values (Criterion 3).

- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

For resources included on the Register of Historic Resources, environmental review may be required under CEQA if property is threatened by a project. Additionally, local building inspectors must grant code alternatives provided under State Historical Building Code. Further, the local assessor may enter into contract with property owner for property tax reduction pursuant to the Mills Act. A property owner also may place his or her own plaque or marker at the site of the resource.

Consent of owner is not required, but a resource cannot be listed over an owner's objections. The State Historical Resources Commission (SHRC) can, however, formally determine a property eligible for the California Register if the resource owner objects.

4. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources (OPR, 2017). By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Pub. Resources Code, Section 21084.2.) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (Pub. Resources Code, Section 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. Public Resources Code Section 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources. These rules apply to projects that have a notice of preparation for an environmental impact report or negative declaration or mitigated negative declaration filed on or after July 1, 2015.

Section 21074 of the Public Resources Code defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

5. State Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims. (CA Legislative Info, n.d.)

California Health and Safety Code, Section 5097.98 states that whenever the commission receives notification of a discovery of Native American human remains pursuant to HSC subdivision (c) of Section 7050.5, it shall immediately notify those persons that are the most likely descendants. The descendants may inspect the site and make recommendations to the landowner as to the treatment of the human remains. The landowner shall ensure that the immediate vicinity around the remains is not damaged or disturbed by further development activity until coordination has occurred with the descendants regarding their recommendations for treatment, taking into account the possibility of multiple human remains. The descendants shall complete their inspection and make recommendations within 48 hours of being granted access to the site.

6. California Code of Regulations Section 15064.5

The California Code of Regulations, Title 14, Chapter 3, Section 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in CEQA Guidelines Section 15064.5, as follows:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852) including the following:
    - Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    - Is associated with the lives of persons important in our past;
    - Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    - Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Cultural Resources Element of the Countywide Plan sets forth goals and policies related to the protection of archaeological and tribal cultural resources. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Goal CR-1: Tribal Cultural Resources. Tribal cultural resources that are preserved and celebrated out of respect for Native American beliefs and traditions.

Policy CR-1.1: Tribal notification and coordination. We notify and coordinate with tribal representatives in accordance with state and federal laws to strengthen our working relationship with area tribes, avoid inadvertent discoveries of Native American archaeological sites and burials, assist with the treatment and disposition of inadvertent discoveries, and explore options of avoidance of cultural resources early in the planning process.

Policy CR-1.3: Mitigation and avoidance. We consult with local tribes to establish appropriate project-specific mitigation measures and resource-specific treatment of potential cultural resources. We require project applicants to design projects to avoid known tribal cultural resources, whenever possible. If avoidance is not possible, we require appropriate mitigation to minimize project impacts on tribal cultural resources.

Policy CR-1.4: Resource monitoring. We encourage active participation by local tribes as monitors in surveys, testing, excavation, and grading phases of development projects with potential impacts on tribal resources.

Goal CR-2: Historic and Paleontological Resources. Historic resources (buildings, structures, or archaeological resources) and paleontological resources that are protected and preserved for their cultural importance to local communities as well as their research and educational potential.

Policy CR-2.3: Paleontological and archaeological resources. We strive to protect paleontological and archaeological resources from loss or destruction by requiring that new development include appropriate mitigation to preserve the quality and integrity of these resources. We require new development to avoid paleontological and archeological resources whenever possible. If avoidance is not possible, we require the salvage and preservation of paleontological and archeological resources.

4.4.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects related to cultural resources that could result from development projects. The Project would result in a significant impact to cultural resources if the Project or any Project-related component would:

a. *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;*

b. *Cause a substantial adverse change in the significance of an archaeological resources pursuant to Section 15064.5; or*

c. *Disturb any human remains, including those interred outside of formal cemeteries.*

4.4.4 Methodology for Evaluating Cultural Resources Impacts

The analysis of potential impacts to pre/protohistoric and historic archaeological resources is based on a cultural resources records search through SCCIC at CSU Fullerton, historic background research, a review of historic aerial photographs, and a visit to the Project Site.

4.4.5 IMPACT ANALYSIS

Threshold a: ***Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?***

Under existing conditions, the Project Site consists of undeveloped land that has been disturbed by historic agricultural activities and on-going maintenance activities (i.e., disking and mowing). There are no structures present on the Project Site. BFSA did not identify any historic resources on the Project Site during their survey of the property and no historic resources had been previously recorded on the Site (BFSA, 2022a, pp. 1.0-12, 3.0-1). Accordingly, implementation of the Project would not cause a substantial change to the significance of a known historical resource.

Notwithstanding, the Project Site was used for agricultural by the 1930s and there is a reasonable possibility that historic resources – buried over decades of disking and tilling activities – may be present beneath the Site's subsurface and may be encountered by initial ground-disturbing activities associated with Project construction. If any historic resources are unearthed during Project construction that meet the definition of historical resource pursuant to CEQA Guidelines Section 15064.5 and are disturbed/damaged by Project construction activities, impacts to those historic cultural resources would be significant.

Threshold b: ***Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

BFSA conducted a cultural resources inventory of the Project Site, which included a records search through the SCCIC at CSU Fullerton and an intensive pedestrian survey of the Site. The results of this records search indicate that no pre/protohistoric cultural resources are located on or within a one-half mile radius of the Project Site. Additionally, no pre/protohistoric resources were observed on the Project Site. (BFSA, 2022a, pp. 1.0-12, 3.0-1). Therefore, implementation of the Project would not cause a substantial adverse change in the significance of a known prehistoric archeological resource pursuant to CEQA Guidelines Section 15064.5.

Given the lack of any previously identified pre/protohistoric sites within or near the property and the magnitude of ground disturbances on the Project Site over the previous 90-plus years, there is little potential for any pre/protohistoric resources to be present or disturbed by the proposed development. Notwithstanding, excavations on portions of the Project Site will exceed five (5) feet below the existing ground surface while previously disturbed soils on-site (i.e., artificial fills) generally only occur at the ground surface; thus, excavations on the Project Site would occur within previously undisturbed soils that could, in theory, contain pre/protohistoric archaeological resources. If any pre/protohistoric cultural resources are unearthed during Project construction that meet the definition of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 and are disturbed/damaged by Project construction activities, impacts to those pre/protohistoric cultural resources would be potentially significant.

Threshold c: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

The Project Site does not contain a cemetery and no known formal cemeteries are located within the immediate Site vicinity (Google Earth, 2021). Field surveys conducted on the Project Site did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the Site (BFSA, 2022a, pp. 3.0-1, 4.0-1). 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 recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the Site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the Site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to human remains, including human remains of Native American ancestry, that may result from development of the Project would be less than significant.

4.4.6 Cumulative Impact Analysis

The potential for implementation of the Project to contribute to cumulative impacts to historical resources was analyzed in conjunction with other projects located in areas that were once similarly influenced by the agriculture industry of San Bernardino County. Record searches and field surveys indicate the absence of significant historical sites and resources on the Project Site; therefore, implementation of the Project has no potential to contribute towards a significant cumulative impact to known historical sites and/or resources. Nonetheless, the potential exists for subsurface historic archaeological resources that meet the CCR Section 15064.5 definition of a significant historical resource to be discovered on the Project Site – and other development project sites in the region – during construction activities. Thus, the Project has the potential to contribute to a significant cumulative impact to historic archaeological sites and/or resources, if such resources are encountered during Project construction.

The potential for Project construction to result in cumulatively considerable impacts to pre/protohistoric archaeological resources were also analyzed in conjunction with other projects located in the traditional use

areas of Native American tribes that are affiliated to the Project Site. Development activities on the Project Site would not impact any known prehistoric archaeological resources and the likelihood of uncovering previously unknown prehistoric archaeological resources during Project construction are low due to the magnitude of disturbance that has occurred on the Site due to historic agriculture uses. Nonetheless, the potential exists for subsurface prehistoric archaeological resources that meet the CCR Section 15064.5 definition of a significant archaeological resource to be discovered on the Project Site – and other development project sites in the region – during construction activities. Accordingly, the Project has the potential to contribute to a significant cumulative impact to prehistoric archaeological sites and/or resources. Therefore, the Project would potentially result in a cumulatively considerable impact to prehistoric archaeological resources if such resources are unearthed during Project construction.

Mandatory compliance with the provisions of California Health and Safety Code Section 7050.5 as well as Public Resources Code Section 5097 *et seq.*, would assure that all future development projects within the region treat human remains that may be uncovered during development activities in accordance with prescribed, respectful and appropriate practices, thereby avoiding significant cumulative impacts.

4.4.7 Significance of Impacts Before Mitigation

Threshold "a:" Potentially Significant Direct and Cumulatively Considerable Impact. No known historic resources are present on the Project Site and the likelihood of uncovering buried historic resources on the Project Site is low due to the magnitude of previous ground disturbances on the Project Site. Nonetheless, the potential exists for Project-related construction activities to result in a potentially direct and cumulatively considerable impact to significant buried/masked historic resources should such resources be discovered during Project-related construction activities.

Threshold "b:" Potentially Significant Direct and Cumulatively Considerable Impact. No known prehistoric resources are present on the Project Site and the likelihood of uncovering buried prehistoric resources on the Project Site is low due to the magnitude of historic ground disturbance on the Project Site. Nonetheless, the potential exists for Project-related construction activities to result in a potentially direct and cumulatively considerable impact to significant subsurface prehistoric archaeological resources should such resources be discovered during Project-related construction activities.

Threshold "c:" Less than Significant Impact. In the unlikely event that human remains are discovered during Project grading or other ground disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 *et seq*. Mandatory compliance with State law would ensure that any discovered human remains are appropriately treated and would preclude the potential for significant impacts.

4.4.8 Mitigation

The following mitigation measures address the potential for Project construction activities to impact significant archaeological resources that may be discovered during ground-disturbing construction activities.

MM 4.4-1 Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to San Bernardino County that an archaeologist that meets the latest version of the Secretary of the Interior Professional Qualifications Standards (hereafter "Project Archaeologist") has been retained to conduct the training and monitoring activities described in Mitigation Measure 4.4-2 and Mitigation Measure 4.4-3.

MM 4.4-2 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to San Bernardino County that the construction site supervisors and crew members involved with grading and trenching operations have received training by the Project Archaeologist to recognize archaeological resources (historic and prehistoric) should such resources be unearthed during ground-disturbing construction activities. The training will include a brief review of the cultural sensitivity of the area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of archaeological resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new supervisorial construction personnel involved with grading and trenching operations that begin work on the Project Site after the initial training session must take the training prior to beginning work on-site.

MM 4.4-3 The Project Archaeologist shall conduct monitoring during all grading, trenching, and excavation activities. The Project Archaeologist shall be equipped to salvage artifacts if they are unearthed to avoid construction delays. Should the Project Archaeologist determine during construction activities that there are no archaeological resources within the Project's disturbance area or should the archaeological sensitivity be reduced to low, archaeological monitoring activities can be reduced to spot-checking or may be allowed to cease.

MM 4.4-4 In the event that suspected cultural resources are discovered during Project construction activities:

a. All work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the other portions of the Project Site outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

b. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to San Bernardino County and the YSMN for review and comment. The Project Archaeologist shall monitor the remainder of ground-disturbing Project construction activities and implement the Plan accordingly.

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

d. At the completion of the basic field analysis and documentation or laboratory analysis, any recovered resource(s) shall be processed and curated according to current professional repository standards. The collections and associated records shall be donated to an appropriate curation facility, or, the artifacts may be delivered to the YSMN or appropriate Native American Tribe(s) if that is recommended by San Bernardino County. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to San Bernardino County, the South Central Coastal Information Center at California State University, Fullerton, and the YSMN or appropriate Native American Tribe(s).

4.4.9 Significance of Impacts After Mitigation

Thresholds "a" and "b:" Less than Significant Impact with Mitigation. Implementation of MMs 4.4-1 through 4.4-4 would ensure the proper identification and subsequent treatment of any significant archaeological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of the required mitigation, the Project's potential impacts to important archaeological resources would be reduced to less than significant. Cumulatively considerable impacts would likewise be reduced to less than significant.

4.5 ENERGY

The analysis in this Subsection is primarily based on information contained in a technical a report prepared by Urban Crossroads, Inc. titled, "Nevada Street Warehouse Energy Analysis," dated May 24, 2022 (Urban Crossroads, 2022c). The technical report is included as *Technical Appendix F* to this EIR. Refer to Section 7.0, *References*, for a complete list of reference sources used in this Subsection.

4.5.1 EXISTING CONDITIONS

A. Electricity Consumption

The Project Site is located within the service area of Southern California Edison (SCE). SCE provides electricity to more than 15 million persons in 15 counties and 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. SCE generates electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers. (Urban Crossroads, 2022c, pp. 15-16)

The Project Site is vacant under existing conditions and does not consume electricity.

B. Natural Gas Consumption

The Project Site is located within the service area of the Southern California Gas Company (SoCalGas). SoCalGas provides service to approximately 5.9 million customers. Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The gas transported to California via the interstate pipelines, as well as some of the California-produced gas, is delivered into SoCalGas intrastate natural gas transmission pipeline systems (commonly referred to as California's "backbone" pipeline system). The backbone pipeline system delivers natural gas to the local transmission and distribution pipeline systems or to natural gas storage fields. (Urban Crossroads, 2022c, pp. 17-20)

The Project Site is vacant under existing conditions and does not consume natural gas.

C. Transportation Energy/Fuel Consumption

Gasoline and other vehicle fuels are commercially-provided commodities. The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California, and those vehicles consume an estimated 17.2 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities that are sold via commercial outlets. (Urban Crossroads, 2022c, pp. 20-21)

The Project Site is vacant under existing conditions and does not contain uses that utilize transportation energy or fuels, with the exception of the periodic operation of maintenance equipment on the Site for fire fuel (i.e., weed) abatement.

4.5.2 Regulatory Setting

A. Federal Plans, Policies and Regulations

1. Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The ISTEA promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. The ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing regional transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. (Urban Crossroads, 2022c, p. 23)

2. The Transportation Equity Act for the 21st Century (TEA-21)

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (Urban Crossroads, 2022c, p. 23)

B. State Plans, Policies and Regulations

1. Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations. The 2021 Integrated Energy Policy Report (2021 IEPR) continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR identifies actions the State and others can take to ensure a clean, affordable, and reliable energy system. California's innovative energy policies strengthen energy resiliency, reduce GHG emissions that cause climate change, improve air quality, and contribute to a more equitable future. (Urban Crossroads, 2022c, pp. 23-24)

2. State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. (Urban Crossroads, 2022c, p. 24)

3. *Title 24 Building Energy Standards*

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The 2019 Building Energy Efficiency Standards are seven (7) percent more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. The 2016 Building Energy Efficiency Standards already were 28 percent more efficient for residential construction and five (5) percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

4. *California Solar Rights and Solar Shade Control Act*

The Solar Rights Act sets parameters for establishing solar easements, prohibits ordinances and private covenants which restrict solar systems, and requires communities to consider passive solar and natural heating and cooling opportunities in new construction (CA Legislative Info, 1978). This Act is applicable to all California cities and counties. California's solar access laws appear in the state's Civil, Government, Health and Safety, and Public Resources Codes. California Pub Res Code Section 25980 sets forth the Solar Shade Control Act, which encourages the use of trees and other natural shading except in cases where the shading may interfere with the use of active and passive solar systems.

5. *Pavley Fuel Efficiency Standards*

California Assembly Bill 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption. (Urban Crossroads, 2022c, p. 24)

6. California Renewable Portfolio Standards (RPS)

First established in 2002 under Senate Bill 1078, California's RPS requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020. (Urban Crossroads, 2022c, p. 25)

7. Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change through its energy usage. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40 percent by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrified transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western U.S. (Urban Crossroads, 2022c, p. 25)

C. Local Plans, Policies and Regulations

1. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to energy usage and energy efficiency. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Natural Resources Element

Goal NR-1: Air Quality. Air quality that promotes health and wellness of residents in San Bernardino County through improvements in locally-generated emissions.

Policy NR-1.8. Construction and Operations. We invest in County facilities and fleet vehicles to improve energy efficiency and reduce emissions. We encourage County contractors and other builders and developers to use low-emission construction vehicles and equipment to improve air quality and reduce emissions.

Policy NR-1.9 Building design and upgrades. We use the CALGreen Code to meet energy efficiency standards for new buildings and encourage the upgrading of existing buildings to incorporate design elements, building materials, and fixtures that improve environmental sustainability and reduce emissions.

Renewable Energy & Conservation Element

Goal RE-1: Energy Conservation and Efficiency. The County will pursue energy efficiency tools and conservation practices that optimize the benefits of renewable energy.

Policy RE-1.1. Continue implementing the energy conservation and efficiency measures identified in the County of San Bernardino Greenhouse Gas Emissions Reduction Plan.

4.5.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects to the environment that could result from a development project's energy consumption. The Project would result in a significant impact under the topic of energy if the Project or any Project-related component would:

a. *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or*
b. *Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.*

Under Threshold "a," the Project would be considered to result in wasteful, inefficient, or unnecessary consumption of energy if energy consumed by the Project's construction and/or operation cannot be accommodated with existing available resources and energy delivery systems, and requires and/or consumes more energy than industrial uses in California of similar scale and intensity.

Under Threshold "b," the Project would be considered to result in a significant impact if any component of the Project resulted in a substantial effect on the environment due to a conflict with a State or local renewable energy or energy efficiency plan.

4.5.4 Methodology for Calculating Project Energy Demands

Information from the CalEEMod (version 2022.1) outputs from the Project's AQIA *(*see *Technical Appendix B*) was utilized to detail the Project's construction equipment, transportation energy demands, and facility energy demands. These outputs are referenced in Appendices 4.1 through 4.3 of the Project's energy analysis report (see *Technical Appendix F*). Additionally, CARB's EMFAC2021 model was used to calculate emission rates, fuel consumption, and VMT for light duty vehicles, light-heavy duty trucks, medium-heavy duty trucks, and heavy-heavy duty trucks traveling to and from the Project Site during construction and operational activities. Data from the EMFAC 2021 model outputs are included in Appendix 4.4 of the Project's energy analysis report.

4.5.5 IMPACT ANALYSIS

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

A. Energy Use During Construction

The Project's construction process would require the use of fuels (gasoline and diesel) and electricity. Project-related construction would represent a "single-event" energy demand and would not require an on-going or permanent commitment of energy resources. Project construction activities were estimated from the CalEEMod data to consume approximately 141,015 kilowatt hours (kWh) of electricity, approximately 16,313 gallons of diesel fuel from operation of construction equipment, 22,926 gallons of diesel fuel from construction vendor trips, and 23,100 gallons of fuel from construction worker trips. (Urban Crossroads, 2022c, pp. 28-34) Detailed calculations for all components of the Project's construction energy use are provided in Appendix 4.1 of the Project's energy analysis (refer to *Technical Appendix F*).

The equipment used for Project construction would conform to CARB regulations and State emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive or less energy efficient than is used for comparable activities elsewhere in the region; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Additionally, Project construction activities would be required to comply with State law (Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3)) and CARB Air Toxic Control Measures that place restrictions on the length of time that diesel-powered equipment and vehicles can idle before powering down (thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment). Lastly, Project construction contractors would be required to comply with applicable CARB regulations regarding retrofitting, repowering, or replacement of older, less-efficient diesel off-road construction equipment. (Urban Crossroads, 2022c, pp. 35, 38) Accordingly, the equipment and vehicles employed in construction of the Project would not result in inefficient wasteful, or unnecessary consumption of fuel.

Indirectly, the Project would realize construction energy efficiencies and energy conservation through the bulk purchase, transport and use of construction materials. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations. (Urban Crossroads, 2022c, p. 35)

As supported by the preceding discussion, the Project's construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

B. Energy Use During Project Operation

Project operations would include transportation energy demands (energy consumed by passenger car and truck vehicles accessing the Project Site) and facility energy demands (energy consumed by building operations and property maintenance activities).

The Project's annual energy demand was calculated with CalEEMod data to be 214,857 gallons of fuel and 3,396,397 kWh of electricity. Although the Project Applicant does not anticipate the proposed building will require natural gas service, for purposes of analysis, the Project was assumed to consume up to 7,955,072 kBTU of natural gas annually (Urban Crossroads, 2022c, pp. 36-37). Refer to Appendices 4.2 through 4.4 from the Project's energy analysis (see *Technical Appendix F*) for detailed calculations of all components of the Project's operational energy use.

The Project's proposed building incorporates contemporary, energy-efficient/energy-conserving design and operational programs (including the enhanced building/utility energy efficiencies mandated by the Energy Code and CalGreen). The Project will be subject to compliance with 2019 Energy Code and CalGreen standards, which became effective on January 1, 2020, and mandate energy conservation features that are more stringent (energy-conserving) than prior versions of the respective codes. In addition, as discussed in more detail in Subsection 4.7, *Greenhouse Gas Emissions*, of this EIR, the Project will incorporate numerous design measures that are intended to reduce greenhouse gas emissions which in turn reduce the proposed building's energy demand (see Mitigation Measure 4.7-1 for a list of the 16 energy efficiency design measures required of the Project). Project building operations would not result in the inefficient, wasteful, or unnecessary consumption of energy due to mandatory Energy Code and CalGreen compliance. Furthermore, the Project Site is within the existing service areas of SCE and SoCalGas, is capable of being served by both energy providers, and implementation of the Project would not cause or result in the need for additional energy facilities or energy delivery systems. From a transportation energy perspective, the Project Site's location proximate to regional and local roadway systems would tend to minimize VMT within the region, acting to minimize regional vehicle energy demands. Furthermore, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. (Urban Crossroads, 2022c, pp. 39-40)

As supported by the preceding discussion, the Project's operational energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Threshold b: ***Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

The following section analyzes the Project's consistency with the applicable federal, State, and local regulations for renewable energy or energy efficiency.

A. Consistency with Federal Energy Plans

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

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

The Transportation Equity Act for the 21st Century (TEA-21)

The Project supports the planning processes emphasized under TEA-21. The Project Site , promotes land use compatibilities through collocation of similar uses and minimizes vehicle miles traveled (VMT) due to its proximate access to the Interstate freeway system. Specifically, the VMT for the Project is approximately 20 percent below the average employment land use in the County (Urban Crossroads, 2022f, pp. 4-5). (Refer to EIR Subsection 4.11, *Transportation* for additional discussion of Project-related VMT.) The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

B. Consistency with State Energy Plans

Integrated Energy Policy Report

The IEPR provides policy recommendations to be implemented by energy providers in California. Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) builds on existing State programs and policies that support the IEPR goals of improving electricity, natural gas, and transportation fuel energy use in California and, therefore, SCE is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the 2021 IEPR. Because the Project obtains electricity from a service provider (SCE) that is consistent with the 2021 IEPR, the Project would not contribute to a conflict with the 2021 IEPR nor interfere with implementation of the goals presented in the 2021 IEPR.

Additionally, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the Project would support the goals presented in the 2021 IEPR.

State of California Energy Plan

The Project Site is located with proximate access to the Interstate freeway system. The location of the Project Site facilitates access, minimizes VMT (which, as noted above, would be 20 percent less than the existing County average for employment land uses), and takes advantage of existing infrastructure systems. Because the Project would not require the use of energy to construct new infrastructure or extend roads and because Project employees would utilize less energy resources to travel to/from their place of employment than the average worker in San Bernardino County (due to below average VMT), the Project supports the recommended urban design and planning strategies identified under the State of California Energy Plan. Accordingly, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Title 24 Building Energy Standards

The Project will design the building shell and building components, such as windows, roof systems, electrical and lighting systems, and heating, ventilating, and air conditioning systems to meet Title 24 Building Energy Standards, including its Energy Efficiency (Part 6) and Green Building (Part 11) standards, which would be confirmed by the County during the building permit review process. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of the energy efficiency standards within Title 24.

Pavley Fuel Efficiency Standards (AB 1493)

AB 1493 is not directly applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493. Notwithstanding, all model year 2009-2016 passenger cars and light duty truck vehicles traveling to and from the Project Site are required by law to comply with the legislation's fuel efficiency requirements.

California Renewable Portfolio Standards (SB 1078)

California's RPS is not directly applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS. Notwithstanding, energy directly or indirectly supplied to the Project Site by electric corporations is required by law to comply with SB 1078.

Senate Bill 350 (SB 350) – Clean Energy and Pollution Reduction Act of 2015

Energy directly or indirectly supplied to the Project Site by electric corporations is required by law to comply with SB 350. No feature of the Project would interfere with implementation of the requirements under SB 350.

C. Consistency with Local Energy Plans

Countywide Plan

The Project's design would comply with the County's Greenhouse Gas Emissions Reduction Plan (GHG Reduction Plan) by incorporating design measures into the proposed building to minimize energy consumption. As part of the County's plan review and permit issuance, design measures from the GHG Reduction Plan will be incorporated into the Project design to ensure the Project can achieve a minimum of 100 points from Table 2, Screening Table for Implementing GHG Performance Standards for Commercial Development and Public (see detailed discussion in EIR Subsection 4.7). Accordingly, no component of the Project would conflict with or interfere with the implementation of Policy RE-1.1 of the Countywide Plan.

D. Conclusion

As supported by the preceding analysis, the Project would not conflict with or obstruct a federal, State or local plan for renewable energy or energy efficiency and a less-than-significant impact would occur.

4.5.6 Cumulative Impact Analysis

The Project and other new development projects within the cumulative study area would be required to comply with all of the same applicable federal, State, and local regulatory measures aimed at reducing fossil fuel consumption and the conservation of energy. Accordingly, the Project would not cause or contribute to a significant cumulatively considerable impact related to conflicts with a State or local plan for renewable energy or energy efficiency.

4.5.7 Significance of Impacts Before Mitigation

Threshold "a:" Less than Significant Impact. The amount of energy and fuel consumed by construction and operation of the Project would not be inefficient, wasteful, or unnecessary. Furthermore, the Project would not cause or result in the need for additional energy facilities or energy delivery systems.

Threshold "b:" Less than Significant Impact. The Project would not cause or result in the need for additional energy production or transmission facilities. The Project would not conflict with or obstruct the achievement of energy conservation goals within the State of California identified in State and local plans for renewable energy and energy efficiency.

4.5.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.6 GEOLOGY & SOILS

The analysis in this Subsection is based primarily on information contained within technical reports prepared by Southern California Geotechnical (hereinafter, "SCG") and BFSA, respectively. The report prepared by SCG, titled "Geotechnical Investigation Proposed Warehouse, Nevada Street, Nort of Palmetto Avenue" and dated September 3, 2021, is provided as *Technical Appendix G* to this EIR (SCG, 2021). The report prepared by BFSA, titled "Paleontological Assessment for the Nevada Street Project" and dated January 3, 2022, is provided as *Technical Appendix H* to this EIR (BFSA, 2022b). Additional sources of information used to support the analysis in this Subsection include the Countywide Plan, Countywide Plan EIR, and County Development Code. All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.6.1 EXISTING CONDITIONS

SCG conducted a visual reconnaissance, subsurface exploration, field and laboratory testing, and geotechnical engineering analysis to collect data regarding the subsurface geologic conditions at the Project Site.

The subsurface exploration consisted of six (6) borings advanced to depths of 20 to 25± feet below the existing Project Site grades. The borings were advanced with hollow-stem augers, by a conventional truck-mounted drilling rig. Representative bulk and relatively undisturbed soil samples were taken during drilling. Relatively undisturbed soil samples were taken with a split barrel "California Sampler" containing a series of one inch long, 2.416± inch diameter brass rings as described in ASTM Test Method D-3550. In-situ samples were also taken using a 1.4± inch inside diameter split spoon sampler, in general accordance with ASTM D-1586. Bulk samples were collected and transported to SCG's laboratory. The approximate locations of the borings are indicated on the Boring Location Plan, included as Plate 2 in the Geotechnical Investigation included herein as *Technical Appendix G.*

A. Soils

Two types of soil conditions were encountered on the Project Site during the soils and geotechnical investigations performed by SGC: artificial fill and alluvium. The characteristics of the soil conditions encountered on the Project Site are summarized below.

1. Artificial Fill

Artificial fill soils were encountered at the ground surface at all subsurface testing locations, extending to depths of 4.5 to 8± feet below the existing Site grades. The fill soils generally consist of loose silty fine sands and fine sandy silts. Trace fine root fibers and medium sands were encountered within the artificial fill soils. (SCG, 2021, p. 6)

2. Alluvium

Native alluvium was encountered beneath the artificial fill soils at all subsurface testing locations, extending to the maximum depth explored on the Project Site (25± feet below existing Site grades). The alluvium generally consists of loose to medium dense silty fine sands, fine sandy silts, and fine to medium sands. Trace

quantities of medium to coarse sand, fine gravel, and clay were encountered within the alluvial strata. (SCG, 2021, p. 6)

B. Groundwater

Readily available groundwater data was reviewed by SCG to determine regional groundwater depths. The primary reference used to determine the groundwater depths in the subject site area was the California Department of Water Resources website.[1] According to data from the nearest monitoring well (State Well Number 340886N1172175W001), located approximately 700 feet northwest of the Project Site, groundwater has ranged between 167 and 208 feet below the ground surface. (SCG, 2021, p. 7)

SCG did not observe any free water during the drilling of the boring locations described above. Based on the lack of water at subsurface testing locations and the moisture contents of the recovered soil samples, SCG concluded that the groundwater table beneath the Project Site is located in excess of 25 feet below the existing ground surface.

C. Seismic Hazards

The Project Site is located in an area of southern California that is subject to strong ground motions due to seismic events (i.e., earthquakes). The geologic structure of southern California is dominated mainly by northwest-trending faults associated with the San Andreas system. The nearest active faults to the Project Site are the San Andreas Fault, located approximately 3.7 miles northeast of the Site, and the Loma Linda Fault (San Jacinto Fault Zone), located approximately 3.1 miles southwest of the Site (CGS, 2022; Google Earth, 2022). An active fault is defined by the California Geological Survey as a fault that has experienced surface displacement within the Holocene Epoch (roughly the last 11,000 years).

Secondary hazards associated with earthquakes include surface rupture, ground failure, unstable soils and slopes. Each of these hazards is briefly described below.

1. Fault Rupture

Fault rupture can occur along pre-existing, known active fault traces; however, fault rupture also can splay from known active faults or rupture along unidentified fault traces. There are no active or potentially active faults occurring on the Project Site and no known faults are mapped trending through or toward the Site and SCG did not identify any evidence of faulting on the Site; therefore, SGC considered the potential for fault rupture on the Project Site to be low (SCG, 2021, p. 10). In addition, the Project Site is not located within or near a fault hazard zone identified by the Countywide Plan (San Bernardino County, 2020, Policy Map HZ-1).

2. Liquefaction

Liquefaction is a phenomenon in which loose, saturated, relatively cohesion-less soil deposits lose shear strength during strong ground motions, which causes the soil to behave as a viscous liquid. Liquefaction is

[1] https://wdl.water.ca.gov/waterdatalibrary//

generally limited to the upper 50 feet of subsurface soils. According to soils hazards mapping conducted as part of the Countywide Plan, the Project Site is not located within an area that is susceptible to liquefaction (San Bernardino County, 2020, Policy Map HZ-2).

3. Unstable Soils and Slopes

The Project Site is generally flat and does not contain steep natural or manufactured slopes and the California Geological Survey has no evidence of historical landslides or rockfalls on the Site (CGS, 2022). In addition, according to soil hazards mapping conducted as part of the Countywide Plan, the Project Site is not located in an area that is susceptible to landslide or hazards related to rock/debris flow (San Bernardino County, 2020, Policy Map HZ-2).

D. Slope and Instability Hazards

1. Soil Erosion

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Soils with characteristics such as low permeability and/or low cohesive strength are more susceptible to erosion than those soils having higher permeability and cohesive strength. Additionally, the slope gradient on which a given soil is located also contributes to the soil's resistance to erosive forces. Because water is able to flow faster down steeper gradients, the steeper the slope on which a given soil is located, the more readily it will erode. According to the United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), soils on the Project Site have a "very low" susceptibility to water erosion hazards (NRCS, 2022).

Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever soil is loose, dry, and finely granulated. According to the USDA NRCS, soils on the Project Site and in the surrounding area are susceptible to wind erosion hazards (NRCS, 2022). Under existing conditions, the majority of the Project Site is covered with non-native grassland and has little potential to contribute windblown soil and sand.

2. Settlement Potential

Settlement refers to unequal compression of a soil foundation, shrinkage, or undue loads being applied to a building after its initial construction that affect the soil foundation. According to SGC, the existing undocumented fill soils and the near-surface native alluvial soils present on the Project Site are susceptible to settlement (SCG, 2021, pp. 12-13).

3. Shrinkage/Subsidence Potential

Subsidence is a gradual settling or sudden sinking of the ground surface (i.e., loss of elevation). The principal causes of subsidence are aquifer-system compaction, drainage of organic soils, underground mining, and natural compaction. Shrinkage is the reduction in volume of soil as the water content of the soil drops (i.e., loss of volume). Testing conducted by SCG on soils collected from the Project Site indicates that the estimated

shrinkage of the individual soil layers at the Site is highly variable, locally ranging from 8 to 24 percent shrinkage, and the soils on the Project Site are subject to minor ground subsidence (approximately 0.1 feet). (SCG, 2021, p. 14)

4. Soil Expansion Potential

Expansive soils are soils that exhibit cyclic shrink and swell patterns in response to variations in moisture content. Based on laboratory testing conducted by SCG, Project Site soils possess a very low expansion potential (Expansion Index = 1) (SCG, 2021, p. 13).

5. Landslide Potential

The Project Site and surrounding area is generally flat and does not contain steep natural or manufactured slopes. As such, there is no potential for landslides to occur on or immediately adjacent to the Site.

E. Paleontological Setting

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

The Project Site and surrounding area are underlain by middle Holocene Young axial-valley deposits, Unit 3 (Qya_3). The Qya_3 deposits are characterized as fine- to coarse-grained sands and pebbly sands. Based on borings taken from the Santa Ana Wash – the alluvial valley that contains the Project Site – Qya_3 deposits range in minimum thickness from 33 to 49 feet. Holocene alluvium soils are considered to be geographically too young to contain significant non-renewable paleontological resources and no paleontological resource discoveries have been recorded in Qya_3 deposits in the vicinity of the Project Site. (BFSA, 2022b)

4.6.2 Regulatory Setting

The following is a brief description of the federal, state, and local environmental laws and regulations related to geology and soils hazards and that also are applicable to the Project and/or Project Site.

A. Federal Plans, Policies, and Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters (EPA, 2020a). The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the Environmental Protection Agency (EPA) has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality

standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

B. State Regulations

1. Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (A-P Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The A-P Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults (CA Legislative Info, n.d.). The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ["Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.] The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Single family wood-frame and steel-frame dwellings up to two stories not part of a development of four units or more are exempt. However, local agencies can be more restrictive than state law requires.

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

There are no active faults on the Project Site and the Project Site is not located within any Alquist-Priolo Earthquake Fault Zone (SCG, 2021, p. 10; San Bernardino County, 2020, Policy Map HZ-1).

2. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the SHMA is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards (CDC, n.d.).

Staff geologists in the Seismic Hazards Program gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate as Zones of Required Investigation (ZORI) those areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. The SHMA requires Site-specific geotechnical investigations be conducted within the ZORI to

identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. The Project Site is not located within a ZORI (SCG, 2021, p. 10).

3. Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act, effective June 1, 1998 (as amended June 9, 1998), requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone (CA Legislative Info, n.d.).

The law requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). These maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling construction and development. Single-family frame dwellings up to two stories not part of a development of four or more units are exempt from the state requirements. However, local agencies can be more restrictive than state law requires.

Before a development permit can be issued or a subdivision approved, cities and counties must require a site-specific investigation to determine whether a significant hazard exists at the site and, if so, recommend measures to reduce the risk to an acceptable level. The investigation must be performed by state-licensed engineering geologists and/or civil engineers.

4. California Building Standards Code (Title 24)

California Code of Regulations (CCR) Title 24 is reserved for state regulations that govern the design and construction of buildings, associated facilities, and equipment (CBSC, 2020, p. 6). These regulations are also known as building standards (reference California Health and Safety Code Section 18909). Health and Safety Code (state law) Section 18902 gives CCR Title 24 the name California Building Standards Code (CBSC).

The CBSC in CCR Title 24 is published by the California Building Standards Commission and it applies to all building occupancies (see Health and Safety Code Sections 18908 and 18938) throughout the State of California. Cities and counties are required by state law to enforce CCR Title 24 (reference Health and Safety Code Sections 17958, 17960, 18938(b), and 18948). Cities and counties may adopt ordinances making more restrictive requirements than provided by CCR Title 24, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission (Reference Health and Safety Code Sections 17958.7 and 18941.5).

5. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water (SWRCB, 2014). The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code Section 13000 *et seq*.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (RWQCBs) (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the State Water Board allocates rights to the use of surface water. The RWQCB have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and RWQCB have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The State Water Resources Control Board (SWRCB) and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project Site is located in the Santa Ana River Watershed, which is within the purview of the Santa Ana RWQCB. The Santa Ana's RWQCB's *Santa Ana River Basin Water Quality Control Plan* is the governing water quality plan for the region.

6. California Public Resources Code

Public Resources Code Section 5097.5 states that "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands" (CA Legislative Info, 1965).

Public Resources Code Section 30244 states that, "Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required" (CA Legislative Info, 1976).

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to natural environmental hazards and paleontological resources. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Natural Resources Element

Goal HZ-1: Natural Environmental Hazards. Minimized risk of injury, loss of life, property damage, and economic and social disruption caused by natural environmental hazards and adaptation to potential changes in climate.

Policy HZ-1.2: New development in environmental hazard areas. We require all new development to be located outside of the environmental hazard areas listed below. For any lot or parcel that does not have sufficient buildable area outside of such hazard areas, we require adequate mitigation, including designs that allow occupants to shelter in place and to have sufficient time to evacuate during times of extreme weather and natural disasters.

- Flood: 100-year flood zone, dam/basin inundation area
- Geologic: Alquist Priolo earthquake fault zone; County-identified fault zone; rockfall/debris-flow hazard area, medium or high liquefaction area (low to high and localized), existing and County-identified landslide area, moderate to high landslide susceptibility area)
- Fire: high or very high fire hazard severity zone

Policy HZ-1.8: Wind erosion hazards. We require new development in medium-high or high wind erosion hazard areas to minimize the effects of wind-blown soil through building and site design features such as fencing, surface treatment or pavement, attenuation or wind barriers, architectural features, building materials, and drought resistant landscaping.

Cultural Resources Element

Goal CR-2: Historic and Paleontological Resources. Historic resources (buildings, structures, or archaeological resources) and paleontological resources that are protected and preserved for their cultural importance to local communities as well as their research and educational potential.

Policy CR-2.3: Paleontological and archaeological resources. We strive to protect paleontological and archaeological resources from loss or destruction by requiring that new development include appropriate mitigation to preserve the quality and integrity of these resources. We require new development to avoid

paleontological and archeological resources whenever possible. If avoidance is not possible, we require the salvage and preservation of paleontological and archeological resources.

2. San Bernardino County Multi-Jurisdictional Local Hazard Mitigation Plan

The County's *Multi-Jurisdictional Local Hazard Mitigation Plan* (*MJLHMP*) is a plan that the County reviews, monitors, and updates approximately every five years to reflect changing conditions and new information regarding potential hazards within the County. The most current version was approved in 2017 (San Bern. Co., 2017). The *MJLHMP* addresses hazards associated with earthquakes, wind surges, wildfire, landslides, floods, terrorism, climate change and drought. The *MJLHMP* includes mitigation measures to address earthquake and landslide concerns on a community-wide level, including but not limited to measures for evaluating proposed developments for geologic hazards and developing public education and awareness materials regarding vegetation and erosion control.

3. San Bernardino County Development Code

The San Bernardino County Development Code (Section 87.08.020) requires development projects to be evaluated by a preliminary soils report that identify site-specific geologic and seismic conditions and provide site-specific recommendations to preclude adverse impacts from soils related hazards and problems. These reports shall recommend corrective action to preclude any structural damage/hazards that may be caused by geological hazards or unstable soils.

San Bernardino County Development Code (Section 85.11.030) also requires development projects to incorporate an erosion control plan into proposed clearing/grubbing, stockpile, grading, or demolition activities to minimize water- and windborne erosion. The erosion control plan is required to be approved by County staff prior to the issuance of the applicable construction permit.

4. San Bernardino County Code of Ordinances

The San Bernardino County Code of Ordinances (Section 35.0118) requires all projects subject to the MS4 permit to prepare and submit a Water Quality Management Plan (WQMP), which shall include proposed structural best management practices (BMPs) and source and treatment control BMPs to infiltrate and/or adequately treat the projected stormwater and urban runoff for the development project.

5. San Bernardino County Building Code

The San Bernardino County Building Code is based on the CBSC and is supplemented with local amendments. The Building Code regulates the construction, alteration, repair, moving, demolition, conversion, occupancy, use, and maintenance of all buildings and structures in the County. The Building Code is included in Title 6, Division 3, Chapter 1 of the County's Code of Ordinances.

6. SCAQMD Rule 403 (Fugitive Dust)

SCAQMD Rule 403 (Fugitive Dust) requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. The purpose of this Rule is to minimize the amount of particulate matter in the ambient air as a result of anthropogenic fugitive dust sources (SCAQMD, 2005).

4.6.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects related to geology and soils that could result from development projects. The Project would result in a significant impact related to geology, soils, or paleontological resources if the Project or any Project-related component would:

a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:*
    i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;*
    ii. *Strong seismic ground shaking;*
    iii. *Seismic-related ground failure, including liquefaction; or*
    iv. *Landslides.*
b. *Result in substantial soil erosion or the loss of topsoil;*
c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;*
d. *Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property;*
e. *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or*
f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

4.6.4 Methodology for Evaluating Geology, Soils, and Paleontological Resources Impacts

The analysis of potential geology, soils, and paleontological resources-related impacts is based upon investigations prepared specifically for the Project Site. The investigations included site reconnaissance, review of published reports, maps and aerial photographs, field exploration, laboratory testing, engineering analysis, and soil borings. The County's General Plan and information sources from State and Federal agencies also were reviewed to establish the Project Site's existing conditions and likelihood of environmental effects.

4.6.5 IMPACT ANALYSIS

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

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

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

A. Rupture of Known Earthquake Fault

There are no known active or potentially active faults on or trending toward the Project Site and the Project Site is not located within a mapped Alquist-Priolo Earthquake Fault Zone (SCG, 2021, p. 10; San Bernardino County, 2020, Policy Map HZ-1). Because there are no known faults located on or trending towards the Project Site, there is no potential for the Project to directly or indirectly expose people or structures to substantial adverse effects related to ground rupture. No impact would occur.

B. Strong Seismic Ground Shaking

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. As a mandatory condition of Project approval, the Project Applicant would be required to construct the proposed building in accordance with the CBSC and the County Building Code, which is based on the CBSC with local amendments. The CBSC and County Building Code, which have been specifically tailored for California earthquake conditions, provide building standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures. In addition, the CBSC (Chapter 18) and the County Development Code (Section 87.08.020) require development project sites to be evaluated for potential geologic hazards and for preliminary soils reports to identify property-specific recommendations 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.

The Project Applicant retained a professional geotechnical firm, SCG, to prepare geotechnical report for the Project; this report is included as *Technical Appendix G* to this EIR. The geotechnical report includes recommendations for design, construction, and grading considerations based on the Site-specific geological conditions and the Project's specific design. The recommendations included seismic design considerations, geotechnical design considerations, site grading recommendations, construction considerations, foundation design and construction, floor slab design and construction, retaining wall design and construction, and pavement design parameters. This geotechnical report is considered "Preliminary" and is subject to review by

the County Building and Safety Division prior to issuance of grading and building permits to ensure the requirements of CBSC and County Development Code are met and property addressed by the Project's construction plans. The County will condition the Project to comply with the Site-specific ground preparation and construction recommendations contained in the reviewed geotechnical report. With mandatory compliance with these standard and Site-specific design and construction measures, implementation of the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking. Impacts would be less than significant.

C. Seismic-Related Ground Failure

According to available mapping data, the Project Site is not expected to be subjected to a significant risk associated with seismic-related ground failure, including liquefaction (San Bernardino County, 2020, Policy Map HZ-2). Regardless, the Project would be required to be designed and constructed in accordance with applicable seismic safety guidelines, including the standard requirements of the CBSC and County Building Code, as noted above. Furthermore, and pursuant to the requirements of County Development Code Section 87.08.020, the Project would be required (via conditions of approval) to comply with the grading and construction recommendations contained within the geotechnical report for the Project Site to further reduce the risk of seismic-related ground failure due to liquefaction. Therefore, implementation of the Project would not directly or indirectly expose people or structures to substantial hazards associated with seismic-related ground failure and/or liquefaction hazards. Impacts would be less than significant.

D. Landslides

The Project Site is relatively flat and there are no steep slopes or recorded landslides in the immediate vicinity of the Project Site (San Bern. Co., 2020a, Policy Map HZ-2; Google Earth, 2022). Accordingly, the Project would not be exposed to substantial landslide risks, and implementation of the Project would not pose a substantial direct or indirect landslide risk to surrounding properties. No impact would occur.

Threshold b: Would the Project result in substantial soil erosion or the loss of topsoil?

A. Construction-Related Erosion Impacts

Development of the Project would result in grading and construction activities that would expose and disturb soils that are currently covered with vegetation. Disturbed soils would be subject to potential erosion during rainfall events or high winds due to the removal of stabilizing vegetation.

Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects – like the Project – that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES permit and the *Santa Ana River Basin Water Quality Control Program* involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP will specify the BMPs that the Project Applicant will be required to implement during construction activities to ensure that waterborne

pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated prior to surface runoff being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. Lastly, the Project would be required to implement an erosion and dust control plan pursuant to County Development Code Section 85.11.030 (and to ensure compliance with SCAQMD Rule 403) to minimize water- and windborne erosion. Mandatory compliance with the SWPPP and the erosion control plan would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, water quality impacts associated with construction activities would be less than significant and no mitigation measures would be required.

B. Post-Development Erosion Impacts

Upon Project build-out, the Project Site would be covered by a building, landscaping, and impervious surfaces (e.g., parking lots). Stormwater runoff from the Project Site would be captured, treated to reduce waterborne pollutants (including sediment), and conveyed from the Project Site via an underground storm drain system. Upon completion of Project buildout, the amount of erosion that would occur on the Project Site would be minimal and less than existing conditions.

To meet the requirements of the County's Municipal Storm Water Permit, and in accordance with San Bernardino County Code of Ordinances Section 35.0118, the Project Applicant would be required to prepare and implement a WQMP, which is a Site-specific post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via BMPs. The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The preliminary WQMP for the Project, which is provided as *Technical Appendix L* of this EIR, identifies preventive, low impact development BMPs (such as the use of permeable surfaces across the site, catch basin inserts, and an underground retention system), non-structural source control BMPs (such as vacuum sweeping of parking lots and routine maintenance of catch inserts to prevent clogging and maximize removal efficiency), and structural source control BMPs (such as utilizing efficient irrigation systems that minimize overspray), to minimize erosion. The WQMP also is required to establish a post-construction implementation and maintenance plan to ensure on-going, long-term erosion protection. Compliance with the WQMP will be required as a condition of approval for the Project, as will the long-term maintenance of erosion and sediment control features. Because the Project would be required to utilize erosion and sediment control measures to preclude substantial, long-term soil erosion and loss of topsoil, the Project would result in less than significant impacts related to soil erosion.

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

The Project Site is relatively flat and not susceptible to landslide hazards (San Bernardino County, 2020, Policy Map HZ-2). Additionally, the Project does not propose the construction of any manufactured slopes. Accordingly, the Project would result in no impacts associated with landslides.

SCG determined that the Project Site's shrinkage/subsidence and settlement potential can be attenuated through the removal of surface and near surface soils down to competent materials and replacement with properly compacted fill with optimum moisture content (SCG, 2021, pp. 10-17). The County will condition the Project to comply with the Site-specific ground preparation and construction recommendations contained in a Project geotechnical report to be reviewed and approved by the County prior to issuance of grading and building permits. Based on the foregoing, potential impacts related to soil shrinkage/subsidence and collapse would be less than significant.

Lateral spreading is primarily associated with liquefaction hazards. As noted above under the response to Threshold "a," the Project Site is not located within an area susceptible to liquefaction. Thus, the potential for lateral spreading is low. Accordingly, impacts associated with lateral spreading would be less than significant.

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

SCG determined that near surface soils on the Project Site have very low expansion potential (SCG, 2021, p. 13). Accordingly, the Project Site does not contain expansive soils and, as such, would not create substantial direct or indirect risks to life or property associated with the presence of expansive soils. No impacts would occur.

[Note: Threshold "d" is based on Appendix G of the CEQA Guidelines and references Table 18-1-B of the 1994 Uniform Building Code (UBC) which has been superseded by the 2016 CBSC. The 2016 CBSC references ASTM D-4829, a standard procedure for testing and evaluating the expansion index (or expansion potential) of soils established by ASTM International, which was formerly known as the American Society for Testing and Materials (ASTM). ASTM D-4829 was used as the standard for evaluating the Project's potential impact related to expansive soils in the above analysis.]

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

The Project is designed to connect to the municipal wastewater disposal and treatment system. The Project does not include septic tanks or alternative wastewater disposal systems. Accordingly, implementation of the Project would result in no impact related to the use or performance of septic tanks and/or alternative wastewater systems.

Threshold f: ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

As noted earlier in this Subsection, there are no known unique paleontological resources or unique geologic features on the Project Site under existing conditions. The Project Site is underlain by Qya_3 deposits, which extend to a depth of between 33 and 49 feet in the Project area, and are too young to contain significant, non-renewable paleontological resources (BFSA, 2022b, p. 7). The grading and excavation activities required to construct the Project would not go deeper than 33 feet below ground surface and therefore would not extend past the Qya_3 deposits to the older alluvium below where paleontological resources would be more likely to occur. Accordingly, implementation of the Project would not indirectly or indirectly destroy a unique paleontological resource or site. No impact would occur.

4.6.6 Cumulative Impact Analysis

With the exception of erosion hazards, potential hazardous effects related to geologic and soil conditions addressed under Thresholds "a," "c," "d," and "e" are unique to the Project Site, and inherently restricted to the specific property proposed for development. That is, issues including fault rupture, seismic ground shaking, liquefaction, landslides, and expansive soils would involve effects to (and not from) a proposed development project, are specific to conditions on the subject property, and are not influenced or exacerbated by the geologic and/or soils hazards that may occur on other, off-site properties. Further, as noted in the foregoing analysis, all potential Project-related direct and indirect impacts related to potential hazardous effects related to geologic and soil conditions would be precluded through mandatory compliance with the CBSC, County Development Code, County Code of Ordinances, other standard regulatory requirements, and the Site-specific geotechnical recommendations contained within the Project's geotechnical report, which will be incorporated into the Project's design via conditions of approval. Because of the Site-specific nature of these potential hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effects to or from other properties.

As discussed under Threshold "b," regulatory requirements mandate that the Project incorporate design measures during construction and long-term operation to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project Site would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and other projects within the cumulative study area would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards would be less than significant.

Because the Holocene-age alluvial soils that underlie the Project Site and surrounding area are too young to contain significant paleontological resources, the Project and other development activities that occur within the same type of Holocene-age alluvial soils that are present on the Project Site would not result in cumulative impacts to paleontological resources (Threshold "f"). Accordingly, a cumulatively considerable impact would not occur.

4.6.7 Significance of Impacts Before Mitigation

Threshold a: Less than Significant Impact. Implementation of the Project would not expose people or structures to substantial direct or indirect adverse effects related to liquefaction or fault rupture. The Project Site is subject to seismic ground shaking associated with earthquakes; however, mandatory compliance with local and State regulatory requirements and building codes would ensure that the Project minimizes potential hazards related to seismic ground shaking to less than significant levels.

Threshold b: Less than Significant Impact. Implementation of the Project would not result in substantial soil erosion or loss of topsoil. The Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities and adhere to a Storm Water Pollution Prevention Plan (SWPPP), and prepare an erosion control plan to minimize water and wind erosion. Following completion of development, the Project's owner or operator would be required by law to implement a Water Quality Management Plan (WQMP) during operation, which would preclude substantial erosion impacts in the long-term.

Threshold c: Less than Significant Impact. There is no potential for the Project's construction or operation to cause, or be impacted by, on- or off-site landslides or lateral spreading. Potential hazards associated with unstable soils would be precluded through mandatory adherence to the recommendations contained in an approved site-specific geotechnical report prior to issuance of grading and construction permits.

Threshold d: No Impact. The Project Site contains soils with no susceptibility to expansion; therefore, the Project would not create substantial direct or indirect risks to life or property associated with the presence of expansive soils. No impact would occur.

Threshold e: No Impact. No septic tanks or alternative wastewater disposal systems are proposed to be installed on the Project Site. Accordingly, no impact would occur associated with soil compatibility for wastewater disposal systems.

Threshold f: No Impact. The Project would not impact any known paleontological resource or unique geological feature. The Project Site is underlain by Holocene alluvium soils that are too young to contain important paleontological resources.

4.6.8 Mitigation

Impacts would be less than significant and no mitigation is required.

4.7 GREENHOUSE GAS EMISSIONS

The analysis provided in this Subsection evaluates whether greenhouse gas (GHG) emissions resulting from the Project have the potential to contribute substantially to Global Climate Change (GCC) and its associated environmental effects. This analysis is based on a report prepared by Urban Crossroads, Inc. titled, "Nevada Street Warehouse Greenhouse Gas Analysis," dated May 24, 2022 (Urban Crossroads, 2022d). The GHG analysis report (GHGA) is included as *Technical Appendix I* to this EIR. All references used in this Subsection are listed in EIR Section 7.0, *References*.

4.7.1 EXISTING CONDITIONS

A. Introduction to Global Climate Change

GCC is defined as the change in average meteorological conditions on Earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past due to human activity and industrialization. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in planet Earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. (Urban Crossroads, 2022d, p. 8)

An individual land development project is not capable of generating the magnitude of GHG emissions necessary to cause a discernible effect on global climate; however, individual development projects may contribute to GCC by generating GHGs that combine with other regional and global sources of GHGs (Urban Crossroads, 2022d, p. 8).

B. Greenhouse Gases

Carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) emissions are the focus of evaluation in this Subsection because these gases are the primary contributors to GCC resulting from land development projects. Although other substances, such as fluorinated gases, also contribute to GCC, sources of fluorinated gases are not well-defined and no accepted emissions factors or methodology exist to accurately calculate the emissions of these gases. (Urban Crossroads, 2022d, pp. 8-9)

A global warming potential (GWP) value represents the effectiveness of a gas to trap heat in the atmosphere. Individual GHGs have varying GWP values, as assigned by the Intergovernmental Panel on Climate Change (IPCC). The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.7-1, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.7-1, GWP values range from 1 for CO_2 up to 23,900 for Sulfur Hexafluoride (SF_6).

Table 4.7-1 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		2nd Assessment Report (SAR)	5th Assessment Report (AR5)
CO_2	See*	1	1
CH_4	12.4	21	28
N_2O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF_6	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Adapted from Table 2.14 of the IPCC Fourth Assessment Report, 2007
Source: (Urban Crossroads, 2022d, Table 2-2)

The information presented below and on the following pages summarizes information from the Project's GHGA regarding various gases that contribute to GCC. For more information about these gases and their associated human health effects, refer to Section 2.3 of *Technical Appendix I* and the reference sources cited therein.

- **Water Vapor (H_2O)** is the most abundant and variable GHG in the atmosphere. Changes in the concentration of water vapor in the atmosphere are considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity rises (in essence, the air is able to 'hold" more water when it is warmer), leading to more water vapor in the atmosphere. The higher concentration of water vapor in the atmosphere is then able to absorb more indirect thermal energy radiated from the Earth, further warming the atmosphere and causing the evaporation cycle to perpetuate. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are able to reflect incoming solar radiation and thereby allow less energy to reach the Earth's surface and heat it up. There are no human health effects from water vapor itself; however, certain pollutants can dissolve in water vapor and the water vapor can then act as a pollutant-carrying agent.

- **Carbon Dioxide (CO_2)** is an odorless and colorless GHG that is emitted from natural and man-made sources. Natural CO_2 sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Man-made CO_2 sources include: the burning of coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, human activities that produce CO_2 have increased dramatically. As an example, prior to the industrial revolution, CO_2 concentrations in the atmosphere were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Exposure to CO_2 in high concentrations can cause adverse human health effects, but outdoor (atmospheric) levels are not high enough to be detrimental to human health.

- **Methane (CH_4)** absorbs thermal radiation (i.e., retains heat) extremely effectively. Over the last 50 years, human activities such as rice cultivation, cattle ranching, natural gas combustion, and coal mining have increased the concentration of methane in the atmosphere. Other man-made sources include fossil-fuel combustion and biomass burning. No human health effects are known to occur from atmospheric exposure to methane; however, methane is an asphyxiant that may displace oxygen in enclosed spaces.

- **Nitrous Oxide (N_2O)** concentrations began to rise in the atmosphere at the beginning of the industrial revolution. N_2O can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction. N_2O is produced by microbial processes in soil and water, including reactions that occur in nitrogen-containing fertilizer. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N_2O also is used as an aerosol spray propellant, as a preservative in potato chip bags, and in rocket engines and in race cars. Also, known as laughing gas, N_2O is a colorless GHG that can cause dizziness, euphoria, and hallucinations. In small doses, it is considered harmless; however, heavy and extended use can cause brain damage.

- **Chlorofluorocarbons (CFCs)** are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were first synthesized in 1928 and have no natural source. CFCs were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and has been extremely successful, so much so that levels of CFCs are now remaining steady or declining. However, due to their long atmospheric lifetime, some of the CFCs will remain in the atmosphere for over 100 years.

- **Hydrofluorocarbons (HFCs)** are synthetic, man-made chemicals that are used as a substitute for CFCs and have one of the highest global warming potential ratings. The HFCs with the largest measured atmospheric abundances are (in order from largest to smallest), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). No human health effects are known to result from exposure to HFCs, which are man-made and used for applications such as automobile air conditioners and refrigerants.

- **Perfluorocarbons (PFCs)** are primarily produced for aluminum production and semiconductor manufacture. PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). No human health effects are known to result from exposure to PFCs.

- **Sulfur Hexafluoride (SF_6)** is an inorganic, odorless, colorless, nontoxic, nonflammable gas. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

- **Nitrogen Trifluoride (NF_3)** is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200. NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis.

C. Greenhouse Gas Emissions Inventory

1. Global and National

Based on the latest available data (through 2018), industrialized nations produced approximately 28,768,440 gigagrams (Gg) of carbon dioxide equivalent (CO_2e) emissions. In 2018, the United States was the world's second-largest emitter of GHGs, producing 6,676,650 Gg CO_2e. (Urban Crossroads, 2022d, p. 16)

2. State of California

Based on the most recent GHG inventory data compiled by the CARB, California emitted an average of approximately 418.1 million metric tons (MMT) of CO_2e per year between 2000-2019. This total represents approximately six (6) percent of the GHGs generated by the United States. (Urban Crossroads, 2022d, p. 16)

3. Project Site

The Project Site is vacant and undeveloped under existing conditions and does not produce GHG emissions, with the exception of negligible GHGs produced by maintenance equipment during periodic weed abatement activities on the Site.

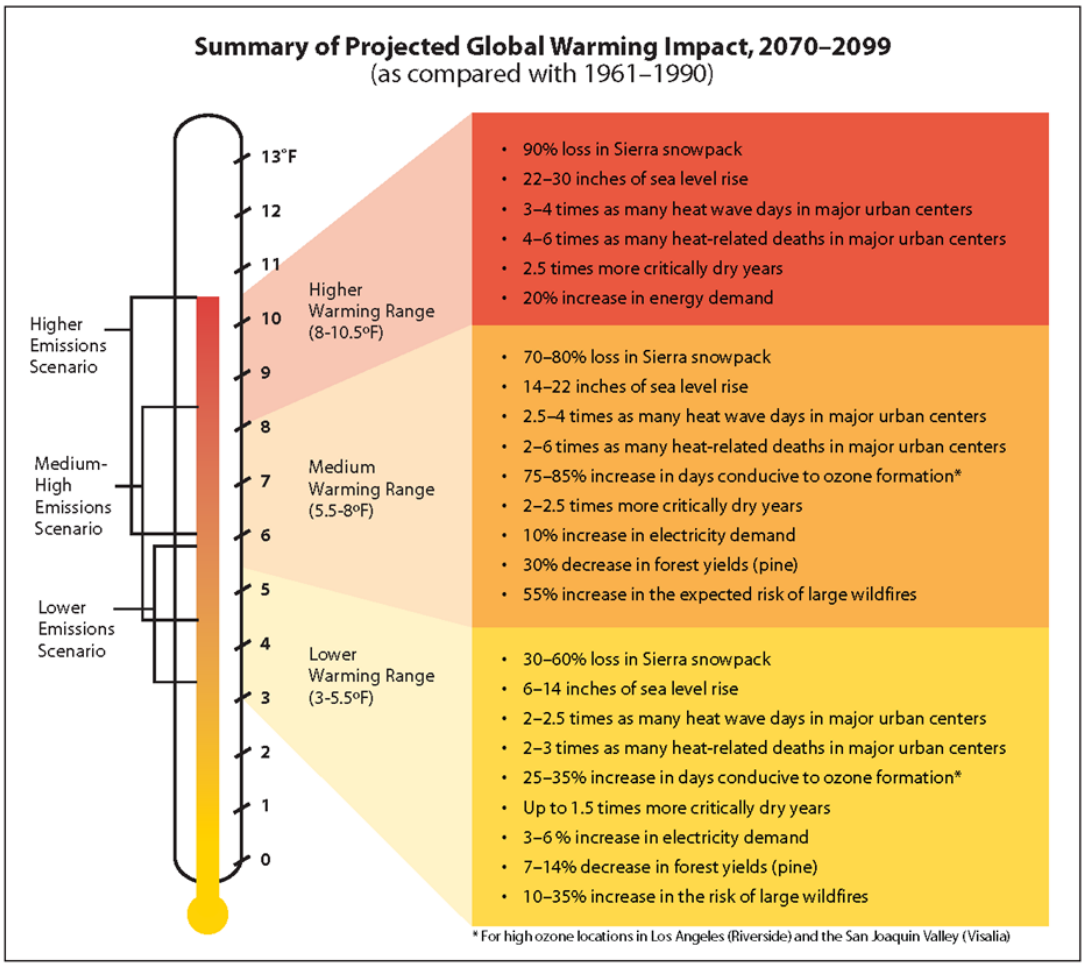
D. Potential Effects of Climate Change in California

In 2006, the California Climate Change Center (CCCC) published a report titled "Scenarios of Climate Change in California: An Overview" (the "Climate Scenarios report") that is generally instructive about effects of climate change in California. The Climate Scenarios report used a range of emissions scenarios developed by the IPCC to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.4°F); medium warming range (5.5-7.8°F); and higher warming range (8.0-10.4°F). (CCCC, 2006, p. 7)

In 2009, the California Natural Resources Agency adopted the "California Climate Adaptation Strategy." This report details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes, and responds to the Governor's Executive Order (EO) S-13-2008 that called on state agencies to develop California's strategy to identify and prepare for expected climate impacts (CNRA, 2021, p. 3).

Table 4.7-2, Summary of Projected Global Warming Impact, 2070-2099, illustrates potential impacts of GCC within California based on the estimated scenarios presented in the Climate Scenario and California Climate Adaption Strategy reports.

Table 4.7-2 Summary of Projected Global Warming Impact, 2070-2099



Source: (Urban Crossroads, 2022d, Exhibit 2-A)

Additionally, the potential effects of climate change in California are summarized below and include, but are not limited to:

- **Human Health Effects.** Climate change can affect the health of Californians by increasing the frequency, duration, and intensity of conditions conducive to air pollution formation, oppressive heat, and wildfires. The primary concern is not the change in average climate, but rather the projected increase in extreme conditions that are responsible for the most serious health consequences. In addition, climate change has the potential to influence asthma symptoms and the incidence of infectious disease. (CCCC, 2006, p. 26)

- **Water Resource/Supply Effects.** Although most climate model simulations predict relatively moderate changes in precipitation over the 21st century, rising temperatures are expected to lead to diminishing snow accumulation in mountainous watersheds, including the Sierra Nevada. Warmer conditions during the last few decades across the western United States have already produced a shift toward more precipitation falling as rain instead of snow, and snowpacks over the region have been melting earlier in the spring.

Delays in snow accumulation and earlier snowmelt can have cascading effects on water supplies, natural ecosystems, and winter recreation. (CCCC, 2006, p. 14)

- **Agriculture Effects.** Agriculture, along with forestry, is the sector of the California economy that is most likely to be affected by a change in climate. California agriculture is a $68 billion industry. California is the largest agricultural producer in the nation and accounts for 13% of all U.S. agricultural sales, including half of the nation's total fruits and vegetables. Regional analyses of climate trends over agricultural regions of California suggest that climate change is already affecting the agriculture industry. Over the period 1951 to 2000, the growing season has lengthened by about a day per decade, and warming temperatures resulted in an increase of 30 to 70 growing degree days per decade, with much of the increase occurring in the spring. Climate change affects agriculture directly through increasing temperatures and rising CO_2 concentrations, and indirectly through changes in water availability and pests. (CCCC, 2006, p. 19)

- **Forest and Landscape Effects.** Climate changes and increased CO2 concentrations are expected to alter the extent and character of forests and other ecosystems. The distribution of species is expected to shift; the risk of climate-related disturbance such as wildfires, disease, and drought is expected to rise; and forest productivity is projected to increase or decrease – depending on species and region. In California, these ecological changes could have measurable implications for both market (e.g., timber industry, fire suppression and damages costs, public health) and nonmarket (e.g., ecosystem services) values. (CCCC, 2006, p. 22)

- **Sea Level Effects.** Coastal observations and global model projections indicate that California's open coast and estuaries will experience rising sea levels during the next century. Sea level rise already has affected much of the coast in southern California, Central California, and the San Francisco Bay and estuary. These historical trends, quantified from a small set of California tide gages, have approached 0.08 inches per year (in/yr), which are rates very similar to those estimated for global mean sea level. So far, there is little evidence that the rate of rise has accelerated, and indeed the rate of rise at California tide gages has actually flattened since about 1980. However, projections indicate that substantial sea level rise, even faster than the historical rates, could occur during the next century. Sea level rise projections range from 5.1–24.4 inches (in.) higher than the 2000 sea level for simulations under the lower emissions scenario, from 7.1–29.9 in. for the medium-high emission scenario, and from 8.5–35.2 in. for the higher emissions scenario. (CCCC, 2006, p. 10)

4.7.2 Regulatory Setting

The following is a brief description of the federal, state, and local environmental regulations related to GHG emissions.

A. International Plans, Policies, and Regulations

1. Kyoto Protocol

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change, which commits its Parties by setting internationally binding emission reduction targets (UNFCCC, n.d.). Recognizing that developed countries are principally responsible for the current high levels

of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

The Kyoto Protocol was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. The detailed rules for the implementation of the Protocol were adopted at Conference of the Parties (COP) 7 in Marrakesh, Morocco, in 2001, and are referred to as the "Marrakesh Accords." Its first commitment period started in 2008 and ended in 2012.

On December 8, 2012, in Doha, Qatar, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from January 1, 2013 to December 31, 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

During the first commitment period, 37 industrialized countries and the European Community committed to reduce GHG emissions to an average of five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first.

2. The Paris Agreement

The Paris Agreement entered into force on November 4, 2016. The Paris Agreement brings all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. As such, it charts a new course in the global climate effort.

The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (UNFCCC, n.d.). Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals, appropriate financial flows, a new technology framework and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust transparency framework.

The Paris Agreement requires all Parties to put forward their best efforts through "nationally determined contributions" (NDCs) and to strengthen these efforts in the years ahead. This includes requirements that all Parties report regularly on their emissions and on their implementation efforts.

On June 1, 2017, President Donald Trump announced he would begin the process of withdrawing the United States from the Paris Agreement. In accordance with articles within the Paris Agreement, the earliest effective date for the United States' withdrawal from the Agreement was November 4, 2020, at which time the withdrawal became official. On January 20, 2021, President Joseph Biden signed the executive order for the United States to rejoin the Paris Agreement, which became official on February 19, 2021.

B. Federal Plans, Policies, and Regulations

1. Clean Air Act

Coinciding with the 2009 meeting of international leaders in Copenhagen, on December 7, 2009, the EPA issued an Endangerment Finding under Section 202(a) of the Clean Air Act (CAA), opening the door to federal regulation of GHGs (EPA, 2021a; DOJ, 2021). The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the EPA has not promulgated regulations on GHG emissions, but it has begun to develop them.

Previously the EPA had not regulated GHGs under the CAA because it asserted that the Act did not authorize it to issue mandatory regulations to address Global Climate Change (GCC) and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 [2007]); however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress.

C. State Plans, Policies, and Regulations

1. Title 24 Building Energy Standards

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020 (CEC, 2018). The 2019 Building Energy Efficiency Standards are seven (7) percent more efficient than the previous (2016) Building Energy Efficiency Standards for residential construction and 30 percent more efficient than the previous Standards for non-residential construction. The 2016 Building Energy Efficiency Standards already were 28 percent more efficient for residential construction and five (5) percent more efficient for nonresidential construction than the 2013 Building Energy Efficiency Standards they replaced.

Part 11 of Title 24 is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

2. California Assembly Bill No. 1493 (AB 1493)

AB 1493 required the CARB to adopt the nation's first GHG emission standards for automobiles (CARB, n.d.). On September 24, 2009, CARB adopted amendments to the "Pavley" regulations that reduce greenhouse gas (GHG) emissions in new passenger vehicles from model year 2009 through 2016. These amendments were part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016. CARB's September amendments cement California's enforcement of the Pavley rule starting in 2009 while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles.

The U.S. EPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005, and was denied by the EPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the CAA requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions." With the granting of the waiver, it is estimated that the Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.

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

3. Executive Order S-3-05

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other state agencies (CA State Library, 2005). The EO requires the Secretary to report back to the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 documents goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80 percent below 1990 levels by 2050.

4. California Assembly Bill 32 – Global Warming Solutions Act of 2006

In September 2006, Governor Schwarzenegger signed Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, which represents a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario (CARB, 2018). Pursuant to AB 32, the CARB must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste.

AB 32 specifically required that CARB do the following:

- Prepare and approve a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020, and update the Scoping Plan every five years.
- Maintain and continue reductions in emissions of GHG beyond 2020.
- Identify the statewide level of GHG emissions in 1990 to serve as the emissions limit to be achieved by 2020.
- Identify and adopt regulations for discrete early actions that could be enforceable on or before January 1, 2010.
- Adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions.
- Convene an Environmental Justice Advisory Committee to advise the Board in developing and updating the Scoping Plan and any other pertinent matter in implementing AB 32.
- Appoint an Economic and Technology Advancement Advisory Committee to provide recommendations for technologies, research, and GHG emission reduction measures.

In December 2008, CARB approved the initial Scoping Plan, which included a suite of measures to sharply cut GHG emissions. CARB's original determination was that to achieve the 1990 emission level in 2020 a reduction in GHG emissions of approximately 28.5 percent would be needed in the absence of new laws and regulations. The Scoping Plan evaluated opportunities for sector-specific reductions, integrates all CARB and Climate Action Team (CAT) early actions and additional GHG reduction measures, identifies additional measures to be pursued as regulations, and outlines the role of the cap-and-trade program.

In May 2014, CARB approved the First Update to the Climate Change Scoping Plan (Update), which builds upon the initial Scoping Plan with new strategies and recommendations. The Update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals, highlights the latest climate change science and provides direction on how to achieve long-term emission reduction goal described in Executive Order S-3-05. Based on the revised emissions level projections, achieving the 1990 emissions level in 2020 would require a reduction of approximately 15.3 percent from the "business as usual" condition (down from the original estimate of 28.5 percent).

5. Senate Bill 32

On September 8, 2016, Governor Brown signed the Senate Bill (SB) 32. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (CA Legislative Info, n.d.). The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80 percent below 1990 levels by 2050.

In December 2017, CARB adopted the Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflects the 2030 target of a 40 percent GHG emissions reduction below 1990 levels set by SB 32. The Second Update builds upon the Cap- and-Trade Regulation; the Low Carbon Fuel Standard; much cleaner cars, trucks and freight movement; cleaner, renewable energy; and strategies to reduce methane emissions from agricultural and other wastes to reduce GHG emissions.

6. California Senate Bill No. 1368 (SB 1368)

In 2006, the State Legislature adopted Senate Bill (SB) 1368 (Perata, Chapter 598, Statutes of 2006), which directs the California Public Utilities Commission (CPUC) to adopt a GHG emission performance standard (EPS) for the future power purchases of California utilities (CEC, n.d.). SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed specified emissions criteria. Accordingly, SB 1368 effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. SB 1368 will lead to dramatically lower GHG emissions associated with California energy demand.

7. Executive Order S-01-07

Executive Order (EO) S-01-07 is effectively known as the Low Carbon Fuel Standard (LCFS). The Executive Order seeks to reduce the carbon intensity of California's passenger vehicle fuels by at least 10 percent by 2020 (CA State Library, 2007). The LCFS requires fuel providers in California to ensure that the mix of fuel they sell into the California market meet, on average, a declining standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold.

8. Senate Bill 1078

Senate Bill (SB) 1078 establishes the California Renewables Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20% of their renewable power by December 31, 2017 for the purposes of increasing the diversity, reliability, public health, and environmental benefits of the energy mix (CA Legislative Info, n.d.).

9. Senate Bill 107

SB 107 directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of renewable electricity (Renewable Portfolio Standard) generated per year, from 17% to an amount that equals at least 20% of the total electricity sold to retail customers in California per year by December 31, 2010 (CA Legislative Info, n.d.).

10. Executive Order S-14-08

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08, revising California's existing Renewable Portfolio Standard (RPS) upward to require all retail sellers of electricity to serve 33% of their load from renewable energy sources by 2020 (CA State Library, 2008). In order to meet this new goal, a substantial increase in the development of wind, solar, geothermal, and other "RPS eligible" energy projects will be needed. Executive Order S-14-08 seeks to accelerate such development by streamlining the siting, permitting, and procurement processes for renewable energy generation facilities. To this end, S-14-08 issues two directives: (1) the existing Renewable Energy Transmission Initiative will identify renewable energy zones that can be developed as such with little environmental impact, and (2) the California Energy Commission (CEC) and the California Department of Fish and Wildlife (CDFW) will collaborate to expedite the review, permitting, and licensing process for proposed RPS-eligible renewable energy projects.

11. Senate Bill 97

By enacting SB 97 in 2007, California's lawmakers expressly recognized the need to analyze GHGs as a part of the CEQA process. SB 97 required the Governor's Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of greenhouse gas emissions (CA Legislative Info, n.d.). Those CEQA Guidelines amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects, and must reach a conclusion regarding the significance of those emissions. (See CEQA Guidelines Section 15064.4.)
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions. (See CEQA Guidelines Section 15126.4(c).)
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See CEQA Guidelines Section 15126.2(a).)
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria. (See CEQA Guidelines Section 15183.5(b).)
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives. (See CEQA Guidelines, Appendix F.)

The CEQA Guideline amendments do not identify a quantitative threshold of significance for GHG emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The GHG analysis thresholds incorporated into the CEQA Guidelines' Environmental Checklist (Guidelines Appendix

G) are addressed in this EIR. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

CEQA Guidelines Section 15064.4 was further amended in 2018 to assist agencies in determining the significance of GHG emissions. This Section gives discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant or cumulatively considerable.

12. Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of more sustainable communities (CARB, n.d.). Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). CARB will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets (see Cal. Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28.).

13. Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which sets a goal to reduce GHG emissions in California to 40 percent below 1990 levels by 2030. The 2030 target serves as a benchmark goal on the way to achieving the GHG reduction goal set by Governor Schwarzenegger via Executive Order S-3-05 (i.e., 80 percent below 1990 greenhouse gas emissions levels by 2050).

D. Local Plans, Policies, and Regulations

1. San Bernardino County Regional Greenhouse Gas Reduction Plan

San Bernardino County first adopted the *Greenhouse Gas Reduction Plan* in September 2011; an update to the *Greenhouse Gas Reduction Plan* was adopted in September 2021 (San Bern. Co., 2021). The *Greenhouse Gas*

Reduction Plan provides an inventory of GHG emissions within unincorporated areas of the County and establishes GHG emissions reduction targets for unincorporated areas of the County that would comply with the mandate of SB 32 (i.e., 40 percent below 2020 levels by the year 2030). The *Greenhouse Gas Reduction Plan* also provides guidance on the methodology to be used to analyze the GHG emissions of proposed development projects within unincorporated areas of San Bernardino County, establishes the criteria to be used to determine the significance of the GHG emissions during the CEQA review process, and establishes a list of standard conditions of approval that would be applied to all development projects to reduce County-wide GHG emissions. Related to CEQA review, the *Greenhouse Gas Reduction Plan* establishes a two-step for development projects. First, a screening threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year is used to determine if further analysis is required. If a development project were to produce GHG emissions of less than 3,000 $MTCO_2e$ per year, then that Project would be considered to be a "less than significant" emitter of GHGs that would not prevent the County of achieving the GHG reduction mandate of SB 32. If a development project were to produce more than 3,000 $MTCO_2e$ per year, then the project is required to either achieve a minimum of 100 points from the applicable screening tables provided in the *Greenhouse Gas Reduction Plan* or provide alternative mitigation that would achieve GHG emissions reductions equivalent to those that would be realized by achieving 100 points from the applicable screening table. Upon achieving at least 100 points from the screening table, or equivalent GHG emissions reductions, the development project would be considered to have a less than significant effect from GHG emissions and would be consistent with the County's GHG emissions reduction target to satisfy SB 32.

2. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to GHG emissions.

Natural Resources Element

Goal NR-1: Air Quality. Air quality that promotes health and wellness of residents in San Bernardino County through improvements in locally-generated emissions.

Policy NR-1.7: Greenhouse gas reduction targets. We strive to meet the 2040 and 2050 greenhouse gas emission reduction targets in accordance with state law.

Policy NR-1.9 Building design and upgrades. We use the CALGreen Code to meet energy efficiency standards for new buildings and encourage the upgrading of existing buildings to incorporate design elements, building materials, and fixtures that improve environmental sustainability and reduce emissions.

4.7.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address a development project's potential to result in significant impacts due to GHG emissions. Neither the CEQA Statute nor the CEQA Guidelines prescribe specific methodologies and significance criteria for determining the significance of GHG emissions impacts. The CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate thresholds consistent with the manner in which other impact categories are handled in CEQA. CEQA case law has upheld local agencies' discretion to determine the significance of GHG

emissions impacts. The proposed Project would result in a significant impact to greenhouse gas emissions if the Project or any Project-related component would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As part of the November, 30, 2015, decision in *Center for Biological Diversity v. California Department of Fish and Wildlife ("Newhall Ranch")*, the California Supreme Court outlined four potential pathways that CEQA compliance documents could use to determine if GHG emissions from a specific project would be significant under Threshold "a":

1. Substantiation of Project Reductions from "Business as Usual" (BAU). A lead agency may use a BAU comparison based on the CARB Scoping Plan's methodology if it also substantiates the reduction a particular project must achieve to comply with statewide goals. The Court suggested a lead agency could examine the "data behind the Scoping Plan's business-as-usual model" to determine the necessary project level reductions from new land use development at the proposed location;
2. Compliance with Regulatory Programs or Performance-based Standards. A lead agency might assess consistency with the State's GHG reduction goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities;
3. Compliance with GHG Reduction Plans or Climate Action Plans (CAPs). A lead agency may utilize "geographically specific GHG emission reduction plans" such as climate action plans or greenhouse gas emission reduction plans to provide a basis for the tiering or streamlining of project-level CEQA analysis; or
4. Compliance with Local Air District Thresholds. A lead agency may rely on "existing numerical thresholds of significance for greenhouse gas emissions" adopted by, for example, local air districts.

Based on the foregoing guidance from the California Supreme Court and CEQA Guidelines Section 15064.4, the County selects Option #3 listed above and will rely on compliance with the County's *Greenhouse Gas Reduction Plan* (2021) in the determination of significance of GHG emissions that would result from the Project. The County's *Greenhouse Gas Reduction Plan* is a geographically-specific GHG emissions reduction plan that was adopted by the County for purposes of reducing County-wide GHG emissions in a manner consistent with SB 32 and applicable State legislation. For purposes of evaluation under CEQA, the County determined that GHG emissions from a private development project found to be consistent with the *Greenhouse Gas Reduction Plan* would result in a less than significant impact to the environment pursuant to Threshold "a" (refer to Appendix A of the *Greenhous Gas Reduction Plan*).

4.7.4 Methodology for Estimating Greenhouse Gas Emissions

The California Emission Estimator Model (CalEEMod, v2022.1, released May 2022), developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the SCAQMD and air pollution control districts across the State, was used to quantify GHG emissions from Project-related construction and operational activities. CalEEMod is the software analysis tool recommended by SCAQMD for the quantification of GHG emissions associated with the construction and operation of land development projects because it is the only software model maintained by CAPCOA and incorporates locally-approved emission factors and methodologies for estimating pollutant emissions. Inputs and outputs from the model runs for both Project-related construction and operational activities are provided Appendices 3.1 through 3.3 of the Project's GHGA (*Technical Appendix I*).

Although CalEEMod is a comprehensive analysis tool, CalEEMod is limited to quantifying GHG emissions that are known as of the date of release of the model; therefore, there may be sources of GHG emissions that are not known (or not quantifiable) at this time but may be measurable by the time the Project is constructed and operational. Furthermore, CalEEMod relies on data published by the CARB and other data sources to be representative of local/regional averages which may not be completely representative of the Project's construction and/or operational characteristics (and may slightly underestimate or overestimate the Project's emissions). Lastly, not all of the CalEEMod calculation data files are known or publicly available for review, although it is reasonable to assume that the data contained in CalEEMod is accurate and grounded in science because CalEEMod is developed by CAPCOA in collaboration with 35 local air pollution control districts.

A life-cycle analysis (LCA), which assesses economy-wide GHG emissions from construction (i.e., the processes in manufacturing and transporting all raw materials used in the project development and infrastructure) and operation, was not conducted for the Project due to the lack of scientific consensus on LCA methodology. A LCA depends on emission factors or econometric factors that are not well established for all processes as of the date the NOP for this EIR was published. Additionally, SCAQMD recommends analyzing a project's direct and indirect GHG emissions generated within California in-lieu of an LCA because a project's life-cycle effects could extend beyond California and these effects might not be well understood or well documented and/or infeasible to mitigate.

A. Methodology for Estimating Project-Related Construction Emissions

The Project's construction-related GHG emissions were calculated using the same methodology, construction schedule information, and equipment fleet information that were used to calculate construction-related criteria air pollutant emissions, and as previously described in detail in EIR Subsection 4.2, *Air Quality.* Refer to EIR Subsection 4.2 and the Project's GHGA (see *Technical Appendix I*) for a detailed description of the methodology used to calculate the Project's construction GHG emissions.

In accordance with the SCAQMD recommendations, the Project's construction-related GHG emissions were quantified, amortized over a 30-year period, and then added to the sum of the Project's annual operational GHG emissions.

B. Methodology for Estimating Project-Related Operational Emissions

The Project's operational GHG emissions were calculated using the same methodology that was used to calculate operational criteria air pollutant emissions, and as previously described in detail in EIR Subsection 4.2, *Air Quality*. Refer to EIR Subsection 4.2 and the Project's GHGA (see *Technical Appendix I*) for a detailed description of the methodology used to calculate the Project's operational GHG emissions.

4.7.5 IMPACT ANALYSIS

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

The Project would result in emissions of 5,292.02 $MTCO_2e$ per year, as summarized in in Table 4.7-3, *Project GHG Emissions*. The Project would result in GHG emissions that exceed the significance threshold of 3,000 $MTCO_2e$ per year and, thus, are considered a significant impact on the environment.

Table 4.7-3 Project GHG Emissions

Emission Source		Emissions (MT/yr)			
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years	24.03	1.00E-03	1.00E-03	0.02	24.43
Mobile Source	1,654.00	0.13	0.18	2.37	1,713.00
Area Source	25.83	2.39	0.00	0.00	85.54
Energy Source	462.00	0.04	0.00	1.00	724.00
TRU Source					527.44
Water Usage	124.50	2.87	0.07	0.00	216.60
Waste	31.87	3.19	0.00	0.00	111.50
Refrigerants	0.00	0.00	0.00	1,679.00	1,679.00
On-Site Equipment	48.10	< 0.005	< 0.005	0.00	48.30
Total CO_2e (All Sources)		**5,292.02**			

CalEEMod output, See Appendix 3.1 and 3.3 of the Project's GHGA for detailed model outputs.
Source: (Urban Crossroads, 2022d, Table 3-6)

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

As demonstrated by the following analysis, the Project would not conflict with applicable plans, policies, and/or regulations adopted with the intent to reduce GHG emissions, including SB 32, SCAG's *2016-2040 RTP/SCS*, and the Title 24 CBSC, which are particularly applicable to the Project.

In April 2015, Governor signed EO B-30-15, which advocated for a statewide GHG-reduction target of 40 percent below year 1990 levels by 2030 and 80 percent below 1990 levels by 2050. In September 2016, Governor Brown signed SB 32, which formally established a statewide goal to reduce GHG emissions to 40

percent below year 1990 levels by 2030. To date, no statutes or regulations have been adopted to translate the year 2050 GHG reduction goal into comparable, scientifically-based statewide emission reduction targets. CARB prepared the 2017 Scoping Plan Update to identify the measures that would achieve the emissions reductions goals of SB 32. Research conducted by the Lawrence Berkeley National Laboratory confirmed that, with compliance with the GHG reduction policy framework within the 2017 Scoping Plan Update, California is on track to meet the year 2030 reduction targets established by SB 32 (Urban Crossroads, 2022d, p. 29). As explained in point-by-point detail in Table 3-8 of the Project's GHGA which is herein incorporated by reference and attached to this EIR as *Technical Appendix I*, the Project would not conflict with applicable measures of the 2017 Scoping Plan Update and, therefore, would not interfere with the State's ability to achieve the year GHG-reduction targets established by SB 32 (Urban Crossroads, 2022d, pp. 49-54).

Rendering a significance determination for year 2050 GHG emissions relative to EO B-30-15 would be speculative because EO B-30-15 establishes a goal three decades into the future; no agency with GHG subject matter expertise has adopted regulations to achieve these statewide goals at the project-level; and, available analytical models cannot presently quantify all project-related emissions in those future years. Further, due to the technological shifts anticipated and the unknown parameters of the regulatory framework in 2050, available GHG models and the corresponding technical analyses are subject to limitations for purposes of quantitatively estimating the Project's emissions in 2050.

The *2016-2040 RTP/SCS* was prepared to ensure that the SCAG region attains the per capita vehicle miles targets for passenger vehicles identified by CARB (and, thus, meeting associated GHG emissions targets), as required by Senate Bill 375. As explained in EIR Section 4.10, *Transportation*, the Project would not conflict with applicable measures of the *2016-2040 RTP/SCS* and, therefore, would not interfere with the region's ability to minimize GHG emissions from transportation sources.

The Project would provide for the construction and operation of a warehouse building that would include contemporary, energy-efficient/energy-conserving design features and operational procedures. Warehouse land uses are not inherently energy intensive and the total Project energy demands would be comparable to, or less than, other goods movement projects of similar scale and configuration due to the Project's modern construction and requirement to be constructed in accordance with the most recent CBSC. The CBSC includes the California Energy Code, or Title 24, Part 6 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings. The California Energy Code was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated approximately every three years to improve energy efficiency by allowing incorporating new energy efficiency technologies and methods. The Project would be required to comply with all applicable provisions of the CBSC. As such, the Project's energy demands would be minimized through design features and operational programs that, in aggregate, would ensure that Project energy efficiencies would comply with – or exceed – incumbent CBSC energy efficiency requirements, thereby minimizing GHG emissions produced from energy consumption.

As described on the preceding pages, implementation of the Project would not conflict with the State's ability to achieve the State-wide GHG reduction mandates and would be consistent with applicable policies and plans related to GHG emissions reductions. Implementation of the Project would not actively interfere with any

future federally-, State-, or locally-mandated retrofit obligations (such as requirements to use new technologies such as diesel particulate filters, emissions upgrades to a higher tier equipment, etc.) enacted or promulgated to legally require development projects to assist in meeting State-adopted GHG emissions reduction targets, including those established under EO S-3-05, EO B-30-15, or SB 32. Therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and would result in a less than significant impact.

4.7.6 Cumulative Impact Analysis

GCC occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines Section 15130[f]). Accordingly, the analysis provided in Subsection 4.7.5 reflects a cumulative impact analysis of the effects related to the Project's GHG emissions, which concludes that the Project would not conflict with applicable GHG-reduction plans, policies, or regulations but would generate cumulatively considerable GHG emissions that may have a significant impact on the environment because the Project would exceed the County's GHG emissions threshold of 3,000 $MTCO_2e$ per year.

4.7.7 Significance of Impacts Before Mitigation

Threshold "a:" Cumulatively Considerable Impact. The Project would exceed the County's significance threshold of 3,000 MTCO2e per year. As such, the Project would generate substantial, cumulatively considerable GHG emissions that may have a significant impact on the environment.

Threshold "b:" Less than Significant Impact. The Project would be consistent with or otherwise would not conflict with, applicable regulations, policies, plans, and policy goals that would further reduce GHG emissions.

4.7.8 Mitigation

The mitigation measure listed below addresses the cumulatively considerable GHG emissions from the Project and shall be in addition to the standard conditions of approval required by the *County of San Bernardino Greenhouse Gas Reduction Plan* (September 2021) for all private development projects.

MM 4.7-1 Prior to the issuance of a building permit, the Project Applicant shall provide documentation to San Bernardino County Land Use Services Department (Planning Division) demonstrating that the design measures listed below have been incorporated into the Project design or that alternative design measures are proposed that would ensure the Project can achieve a minimum of 100 points from Table 2, Screening Table for Implementing GHG Performance Standards for Commercial Development and Public Facilities, of the *County of San Bernardino Greenhouse Gas Reduction Plan* (September 2021).

Feature	Description	Points
Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	9
Windows	Greatly Enhanced Window Insulation (0.32 or less U-factor, 0.25 or less SHGC)	5
Heating/Cooling Distribution System	Enhanced Duct Insultation (R-8)	6
Space Heating/ Cooling Equipment	High Efficiency HVAC (SEER 15/80% AFUE or 8.5 HSPF)	5
Water Heaters	High Efficiency Water Heater (0.72 Energy Factor)	10
Daylighting	All rooms within building have daylight (through use of windows, solar tubes, skylights, etc.)	2
	All rooms daylighted	
Artificial Lighting	Very High Efficiency Lights (100% of in-unit fixtures are high efficiency)	8
Building Placement	North/south alignment of building or other building placement such that the orientation of the buildings optimizes conditions for natural heating, cooling, and lighting	4
Water Efficient Landscaping	Only California Native landscape that requires no or only supplemental irrigation	5
Water Efficient Irrigation Systems	Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water use)	3
Toilets	Water Efficient Toilets/Urinals (1.5 gpm)	6
	Waterless Urinals	
Faucets	Water Efficient faucets (1.28 gpm)	2
Recycled Water	Graywater (purple pipe) irrigation system on site	5
Parking	Provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles	1
Worker and Customer Based Electric Vehicle Chargers	Level 2 240 volt AC Fast Chargers (5 total)	25
Recycling	Recycle construction waste	4
TOTAL POINTS EARNED BY COMMERCIAL/INDUSTRIAL PROJECT		***100***

4.7.9 Significance of Impacts After Mitigation

Threshold "a:" Less than Significant Impact with Mitigation. MM 4.7-1 requires the Project to include design measures that would reduce GHG emissions. The GHG-reduction measures provided by the Project must achieve a minimum of 100 points from the applicable screening table within the *County of San Bernardino Greenhouse Gas Reduction Plan.* As stated in the *County of San Bernardino Greenhouse Gas Reduction Plan*, development projects that achieve 100 points "... are consistent with the Plan and therefore will be determined to have a less than significant individual and cumulative impact for GHG emissions" (San Bern. Co., 2021; Appendix A, Page 6). Accordingly, upon implementation of MM 4.7-1, the Project would result in a less than significant from GHG emissions.

4.8 HAZARDS & HAZARDOUS MATERIALS

The information and analysis presented in this Subsection is based in part on a Phase I Environmental Site Assessment (ESA) report prepared by V3 Companies (hereinafter, "V3") and a Phase II ESA report prepared by Partner Engineering and Science, Inc. (hereinafter, "Partner"). The Phase I and Phase II ESAs were prepared to determine the presence or absence of hazardous materials on the Project Site under existing conditions. The report prepared by V3 is titled "Phase I Environmental Site Assessment, Approximately 17-Acre Vacant Land 27050 Palmetto Avenue" (dated August 31, 2021) and is included as *Technical Appendix J* to this EIR (V3, 2021). The report prepared by Partner is titled "Phase II Subsurface Investigation Report" (dated March 9, 2022) and is included as *Technical Appendix K* to this EIR. This Subsection also relies on information from the Countywide Plan (San Bern. Co., 2020); Cal Fire (Cal Fire, 2008); and Google Earth (Google Earth, 2022). All references used in this Subsection are listed in EIR Section 7.0, *References*.

In this EIR, the term "toxic substance" is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances.

In this EIR, the term "hazardous material" is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, Section 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids), corrosivity (strong acids and bases), reactivity (explosives or generates toxic fumes when exposed to air or water), and toxicity (materials listed by the U.S. Environmental Protection Agency [EPA] as capable of inducing systemic damage to humans or animals). Certain wastes are called "Listed Wastes" and are found in the California Code of Regulations, Title 22, Sections 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

4.8.1 EXISTING CONDITIONS

A. Historical Review, Regulatory Records Review, and Field Reconnaissance

1. Historical Review

V3 reviewed various sources of information to determine the historical uses of the Project Site, including historical aerial photographs, historical topographic maps, Environmental Data Resources (EDR) collection of regulatory database records, city directories, historical site occupants, and historical site ownership records. Refer to *Technical Appendix J* of this EIR for more detailed information from the historical review.

The Project Site was vacant land prior to 1901 and from at least 1930 to 1975 was used as an orchard. By 1985, the Project Site was vacant and all trees had been removed. From at least 1989 until 2014, the Project

Site was used for agriculture and planted with row crops. Agricultural production on the Project Site ceased in 2014. The northwest corner of the Project Site was used for the storage of dumpster trailers beginning between 2016-2018 and ending in 2021. (V3, 2021, p. 12; Google Earth, 2022)

2. Regulatory Records Review

V3 researched federal, State, and local environmental records databases to identify properties within or adjacent to the Project Site with reported environmental issues. A summary of the research results is provided below; detailed information is provided in the Project's Phase I ESA (refer to *Technical Appendix J*).

None of the parcels within the Project Site are listed on federal, State, or local databases for hazardous materials/wastes (V3, 2021, pp. 8-12). Three properties in the vicinity of the Project Site are included on environmental records databases due to past and/or ongoing activities:

- California Street Landfill: The California Street Landfill (CSL) is an approximately 115-acre, active landfill owned and operated by the City of Redlands that is located north and west of the Project Site. Since 1963, the CSL has accepted municipal solid wastes generated within the City of Redlands consisting primarily of residential, commercial, industrial waste, and dried sewage sludge from the City of Redlands wastewater treatment plant. The landfill does not accept hazardous waste. Groundwater beneath the CSL has been impacted by volatile organic compounds (VOCs); however, groundwater beneath the CSL flows to the west (i.e., away from the Project Site) and monitoring well data indicates that VOC concentrations are sufficiently low that they do not pose a hazard for vapor intrusion. (V3, 2021, pp. 8-9)

- Redlands Wastewater Treatment Plant: The Redlands Wastewater Treatment Facility (RWWTP) is an active sewer treatment facility that abuts the Project Site on the north. The RWWTP is listed on environmental records databases due to the generation of hazardous wastes as part of the wastewater treatment process; the use of a petroleum above ground storage tank (AST); and a hazardous materials release (i.e., diesel fuel and gasoline) that occurred in 1993 and remediated in 1994. The diesel fuel and gasoline release did not result in documented impacts to local groundwater; notwithstanding, the Project Site is upgradient of the RWWTP and is not exposed to groundwater flows from the RWWTP property. (V3, 2021, p. 9)

- Norton Air Force Base (San Bernardino International Airport): Norton Air Force Base (AFB) covers approximately 2,036-acres near the City of San Bernardino, San Bernardino County, California, approximately 0.60-mile northwest of the Project Site. The base began operations in 1942 and closed in 1994 before re-opening in 2008 as the San Bernardino International Airport. Operations at the Norton AFB included jet engine and repair of aircraft; and maintenance and logistics for liquid fuel intercontinental ballistic missiles. The burial of drums; disposal of waste oils, solvents, and paint residues into landfills, unlined pits, ponds, and drying beds; leaking underground tanks; and spills of oils, solvents, PCBs, and acidic plating solutions occurred on the site. Norton AFB was placed on the United States Environmental Protection Agency (US EPA) National Priority List (NPL) due to groundwater contamination in in 1987. The contaminated groundwater plume at Norton AFB was determined to not affect the Project Site because the Project Site is located upgradient of the AFB and

the Santa Ana River, which forms a hydraulic barrier separating Norton AFB from the Project area. (V3, 2021, p. 10)

3. *Field Reconnaissance*

V3 conducted an inspection of the Project Site and immediately abutting area on August 18, 2021. The Project Site was observed to be vacant land with a chain-link fence along its northern boundary and along portions of its southern boundary. No structures are present on the Project Site. V3 did not observe evidence of potential environmental concerns on the Project Site, including but not limited to: hazardous substances and petroleum products, storage tanks or hazardous product containers, stained soils, stressed vegetation, odors, wells, or pits, ponds or pools of liquid. The most notable observation on the Site were two small piles of landscape debris (tree limbs and trunks); it was not known if the landscape debris was generated on the Project Site or dumped from an off-site area. V3 did not observe evidence of potential environmental concerns on the properties adjoining the Project Site. Based on the field reconnaissance, V3 did not identify recognized environmental conditions associated with the Project Site or that could affect the Site. (V3, 2021, pp. 14-15)

B. Airport Hazards

The Project Site is located approximately 0.60-mile southeast of the San Bernardino International Airport. The Project Site is not located within a safety compatibility zone for airport operations hazards or airport noise (San Bern. Co., 2019, p. 5.8-27). Based on planned buildout of the San Bernardino International Airport under the plan for the Eastgate Air Cargo Facility, the northern half of the Project Site would be located within the Airport's 60 dBA CNEL noise contour and the southern half of the Project Site would be located outside of the 60 dBA CNEL noise contour (Urban Crossroads, 2022e, pp. 17-18).

C. Wildland Fire Hazards

The Project Site is not located adjacent to any wildlands. The Countywide Plan does not identify the Project Site within a fire hazard severity zone and the Project Site and surrounding area are not located within a County fire safety overlay zone (San Bern. Co., 2020, Policy Map HZ-5). According to the California Department of Forestry and Fire Protection (Cal Fire), the Project Site is located within a "Non-Very High Fire Hazard Severity Zone" (Cal Fire, 2008).

4.8.2 Regulatory Setting

Hazardous materials and hazardous wastes are regulated by various federal, State, and local regulations to protect public health and the environment. This section summarizes the overall regulatory framework governing hazardous materials management that is applicable to the Project and/or the Project Site.

A. Federal Plans, Policies, and Regulations

1. *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Superfund Amendments and Reauthorization Act (SARA)*

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as

well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment (EPA, 2021a). Through CERCLA, the Environmental Protection Agency (EPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup. EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, EPA obtains private party cleanup through orders, consent decrees, and other small party settlements. EPA also recovers costs from financially viable individuals and companies once a response action has been completed.

EPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies.

The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA).

2. Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave;" this includes the generation, transportation, treatment, storage, and disposal of hazardous waste (EPA, 2021b). RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

3. Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property." (OSHA, n.d.)

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement.

4. Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce (OSHA, n.d.). The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property.

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

5. Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions (EPA, 2021c). In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states.

6. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures (EPA, 2021d). Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.

- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all submissions as well as voluntary "For Your Information" (FYI) submissions. The latter are not required by law, but are submitted by industry and public interest groups for a variety of reasons.

B. State Regulations

1. Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA (OSHA, n.d.). The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace.

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including: elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries or illnesses.

2. California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Section 25100, et seq.) is the primary hazardous waste statute in California (CA Legislative Info, n.d.). The HWCL implements RCRA as a "cradle-to-grave" waste management system in the state. It specifies that

generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA).

3. California Code of Regulations (CCR), Titles 5, 17, 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 5 contains the California Plumbing Code which, in Appendix H, establishes detailed standards for the capping, removal, fill, and disposal of cesspools, septic tanks, and seepage pits. Title 17, Division 1, Chapter 8, defines and regulates handling and disposal of lead-based paint. Any detectable amount of lead is regulated. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, *et seq.*) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics).

4. Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

California's Unified Program, overseen by the California Environmental Protection Agency (CalEPA), protect Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Unified Program is a consolidation of multiple environmental and emergency management programs, including the following:

- Aboveground Petroleum Storage Act (APSA) Program;
- Area Plans for Hazardous Materials Emergencies;
- California Accidental Release Prevention (CalARP) Program;
- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- Hazardous Materials Management Plan (HMMP) and Hazardous Materials Inventory Statements (HMIS) (California Code)
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs; and
- Underground Storage Tank Program.

State agency partners involved in the implementation of the Unified Program are responsible for setting program element standards, working with CalEPA to ensure program consistency, and providing technical assistance to the California Unified Program Agencies (CUPAs) and Program Agencies (PAs). The state agencies involved with the Unified Program include CalEPA, Department of Toxic Substances Control

(DTSC), the Governor's Office of Emergency Services (Cal OES), CAL FIRE – Office of the State Fire Marshall (CAL FIRE-OSFM), and the State Water Resources Control Board.

5. License to Transport Hazardous Materials

Caltrans regulates hazardous materials transportation on all interstate roads (California Vehicle Code, Section 32000.5, *et seq*). Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

6. California Hazardous Materials Release Response Plan and Inventory Law of 1985

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the State. Local agencies are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the California Emergency Management Agency. The California Highway Patrol and California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

7. California Government Code (CGC) Section 51178

This section specifies that the Director of CalFire, in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Areas (LRAs), based on consistent statewide criteria, and the expected severity of fire hazard. Per CGC Section 51178, a local agency may, at its discretion, exclude an area within its jurisdiction that has been identified as a VHFHSZ, if certain conditions are met and/or specific findings can be made regarding the availability of effective fire protection services within the affected area.

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to natural environmental and human-generated hazards. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Hazards Element

Goal HZ-1: Natural Environmental Hazards. Minimized risk of injury, loss of life, property damage, and economic and social disruption caused by natural environmental hazards and adaptation to potential changes in climate.

Policy HZ-1.13: Fire protection planning. We require that all new development in County-designated Fire Safety Overlay and/or CAL FIRE-designated Very High Fire Hazard Severity Zones meet the requirements of the California Fire Code and the California Building Code as amended by the County Fire Protection District, including Title 14 of the California Code of Regulations fire safety requirements for any new development within State Responsibility Areas, as well as provide and maintain a Fire Protection Plan or Defensible Space/Fuel Modification Plan and other pre-planning measures in accordance with the County Code of Ordinances.

Policy HZ-1.14: Long-term fire hazard reduction and abatement. We require proactive vegetation management/hazard abatement to reduce fire hazards on existing private properties, along roadsides of evacuation routes out of wildfire prone areas, and other private/public land where applicable, and we require new development to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel modification, and roadside fuel reduction in the Fire Safety Overlay and/or Very High Fire Hazard Severity Zones.

Policy HZ-1.15: Evacuation route adequacy. We coordinate with CAL FIRE, California's Office of Emergency Services, and other local fire districts to identify strategies that ensure the maintenance and reliability of evacuation routes potentially compromised by wildfire, including emergency evacuation and supply transportation routes.

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

Policy HZ-2.1: Hazardous waste facilities. We regulate and buffer hazardous waste facilities to protect public health and avoid impacts on the natural environment.

Policy HZ-2.2: Database of hazardous materials. We maintain up-to-date databases of the storage, use, and production of hazardous materials, based on federally- and state-required disclosure and notification, to appropriately respond to potential emergencies.

Policy HZ-2.3: Safer alternatives. We minimize the use of hazardous materials by choosing and by encouraging others to use non-toxic alternatives that do not pose a threat to the environment.

Policy HZ-2.4: Truck routes for hazardous materials. We designate truck routes for the transportation of hazardous materials through unincorporated areas and prohibit routes that pass through residential neighborhoods to the maximum extent feasible.

Policy HZ-2.5: Community education. We engage with residents and businesses to promote safe practices related to the use, storage, transportation, and disposal of hazardous materials.

2. San Bernardino County Multi-Jurisdictional Local Hazard Mitigation Plan

The County's *Multi-Jurisdictional Local Hazard Mitigation Plan* (*MJLHMP*) is a plan that the County reviews, monitors, and updates approximately every five years to reflect changing conditions and new information regarding potential hazards within the County. The most current version was approved in 2017 (San Bern. Co., 2017). The *MJLHMP* addresses hazards associated with wildfire, as well as other natural hazards such as earthquakes, wind surges, landslides, floods, terrorism, climate change and drought. The *MJLHMP* includes mitigation measures to address wildfire hazards on a community-wide level, including but not limited to measures for construction of emergency access roads in high-fire hazard areas, establishment of fire hazard (weed) abatement programs, and establishment of a wildfire taskforce.

3. Local Permitting Requirements

The aforementioned federal and State hazardous materials regulations require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to obtain a hazardous materials permit and submit a business plan to its local Certified Unified Program Agency (CUPA). The CUPA also ensures local compliance with all applicable hazardous materials regulations. The CUPA for the Project is the San Bernardino County Fire Department, Hazardous Materials Division. The San Bernardino County Fire Department, Hazardous Materials Division also manages the following hazardous waste programs: 1) Hazardous Materials Release Response Plans and Inventory; 2) California Accidental Release Program; 3) Underground Storage Tanks; 4) Aboveground Petroleum Storage Act/Spill Prevention, Control, and Countermeasure Plan; 5) Hazardous Waste Generation and Onsite Treatment; and 6) Hazardous Materials Management Plans and Inventory.

4. San Bernardino International Airport Layout Plan

The *San Bernardino International Airport Layout Plan* identifies safety zones, noise impact zones, and overflight zones for areas near the San Bernardino International Airport. The Project Site is not located in any hazard zones due to airport flight operations or airport noise (San Bern. Co., 2019, p. 5.8-27).

4.8.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects related to hazards and hazardous materials that could result from development projects. The Project would result in a significant impact to hazards and hazardous materials if the Project or any Project-related component would:

a. *Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;*

b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*

c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*

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

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

f. *Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan; or*

g. *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.*

4.8.4 Methodology for Evaluating Hazards & Hazardous Materials Impacts

The analysis of potential hazards and hazardous materials-related impacts is based upon hazardous materials investigations prepared specifically for the Project Site. The investigations included a site reconnaissance, review of published reports, maps, and aerial photographs, and soil testing. The analysis also included a review of the Countywide Plan, information sources from State and Federal agencies, a review of applicable airport land use plans, hazardous materials mapping, fire hazard mapping, and other resource databases.

4.8.5 Impact Analysis

Threshold a:	***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***
Threshold b:	***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Implementation of the Project would require grading across the entire Project Site and construction and long-term operation of an industrial warehouse building on the Site. In the event any hazards or hazardous materials were to be present on the Project Site or any hazardous materials were to be used or stored on the Project Site during construction or long-term operation, the Project would have the potential to expose workers on-site, the public, and/or the environment to a substantial hazard. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment during any stage of the Project.

A. Impact Analysis for Existing Site Conditions

As discussed previously in subsection 4.8.1, no evidence of potential environmental concerns was observed on the Project Site, including but not limited to: hazardous substances and petroleum products, storage tanks or hazardous product containers, stained soils, stressed vegetation, odors, wells, or pits, ponds or pools of liquid.

Notwithstanding the visual observations collected by V3, the Project Site had been used for agricultural operations over its history – as an orchard from at least 1930 to 1975 and for field crops from at least 1989 until 2014 – and there is the potential that agricultural chemicals had been applied to the Site. A total of 18 soil boring samples were collected from the Project Site, spaced at approximately 1-acre intervals and collected at a depth between 0.5 and 1.0 foot below the ground surface. Five (5) of the collected soil samples were positive for 4,4'-Dichlorodiphenyldichloroethylene (4,4'-DDE), which is a chemical substance formed when dichlorodiphenyltrichloroethane (DDT) breaks down. DDT was banned in 1972, thus it can be presumed that the substance was applied to at least a portion of the Project Site at least 50 years ago while the Site was used as an orchard. The concentrations of 4,4'-DDE detected in soils on the Project Site were low and did not exceed the applicable regional screening levels (RSLs) for industrial land uses, as established by the US EPA. No other agricultural chemicals were detected in soils from the Project Site. (Partner, 2022, p. 4)

Based on the foregoing information, there are no existing conditions or features on the Project Site that would represent a substantial hazard to the public or the environment. Developing the Project Site would result in a less than significant hazard to the public or the environment from the disposal or release of hazardous materials.

B. Impact Analysis for Temporary Construction-Related Activities

Heavy equipment (e.g., dozers, excavators, tractor) would operate on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. Also, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project Site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the Environmental Protection Agency (EPA), US Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; California Department of Toxic Substances Control (DTSC), SCAQMD, Santa Ana Regional Water Quality Control Board (RWQCB), and the California Department of Industrial Relations Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

C. Impact Analysis for Long-Term Operation

The Project Site would be developed with an industrial warehouse building; the future building user(s) are not yet identified. Hazardous materials storage is not expected to occur within the building or on the Project Site; however, the future user(s) of the Project could use hazardous chemicals and/or materials could be utilized during routine Project operations and maintenance, including but not limited to aerosols, cleaners, fertilizers, lubricants, paints or stains, solvents, and fuels (e.g., gasoline, propane). State and federal Community-Right-

to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies. Any business that occupies the warehouse building on the Project Site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the San Bernardino County Fire Department Hazardous Materials Division in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the San Bernardino County Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business, and to prepare a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. With mandatory regulatory compliance, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Based on the foregoing information, potential hazardous materials impacts associated with long-term operation of the Project are regarded as less than significant.

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

There are no existing or proposed schools within 0.25-mile of the Project Site. The nearest school to the Project Site is the Packinghouse Christian Academy, which is located approximately 0.7-mile southeast of the Project Site (Google Earth, 2022). Accordingly, the Project has no potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within one-quarter mile of an existing or proposed school. No impact would occur.

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

Government Code Section 65962.5 requires DTSC, the State Department of Health Services, State Water Resources Control Board, and the State Department of Resources Recycling and Recovery to maintain a list of hazardous materials sites that fall within specific, defined categories. The Project Site is not included on any hazardous materials sites database regulated by Government Code Section 65962.5 (V3, 2021, p. 8). No impact would occur.

Threshold 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?***

As previously described in subsection 4.8.1, the Project Site is not located within any existing noise or safety compatibility zone for the San Bernardino International Airport. Further, upon planned buildout of the Eastgate

Air Cargo Facility project at the San Bernardino International Airport, the Project Site would not be located within a noise contour that is incompatible with industrial land uses (Urban Crossroads, 2022e, pp. 15, 17). The Project would not interfere with flight operations at the San Bernardino International Airport because the building proposed by the Project is not located within an approach or departure zone for the Airport and would be no greater than 50 feet in height. Additionally, the Project does not include an air travel component (e.g., runway, helipad) that would interfere with operations at the San Bernardino International Airport. Accordingly, implementation of the Project would not result in an airport-related hazard for people living or working in the Project area and impacts would be less than significant.

Threshold f: ***Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

The Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route (San Bern. Co., 2020; San Bern. Co., 2017). As part of the County's discretionary review process, the County reviewed the Project's application materials to ensure that adequate emergency ingress and egress would be available to-and-from the Project Site and that Project operation would not substantially impede emergency response times in the local area. During construction, all materials and equipment would be stored/staged on the Project Site and would not interfere with emergency vehicles traveling along Nevada Street. Limited Project construction activities would occur within the Nevada Street public right-of-way; however, for any work within the right-of-way that requires a partial or full closure of a sidewalk or vehicle travel lane, the construction contractor would be required to implement a traffic control plan that complies with the *California Manual on Uniform Traffic Control Devices* and must be approved by the County to ensure that emergency response is not adversely affected. During construction and long-term operation, the proposed Project would be required to maintain adequate emergency access for emergency vehicles. Accordingly, implementation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

Threshold g: ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.***

The Project Site is not located adjacent to wildlands nor is the Project Site located within or adjacent to a very high fire hazard severity zone (Cal Fire, 2008; Google Earth, 2022). Accordingly, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

4.8.6 Cumulative Impact Analysis

Because the issue of hazards and hazardous materials tend to be site-specific in nature, the cumulative study area includes existing and planned developments within a one-mile radius of each Project Site. A one-mile radius is appropriate because that is the standard distance used in regulatory database searches of properties that may generate or store toxic materials.

As discussed above under the responses to Thresholds "a" and "b," the Project's construction and operation would be required to comply with all applicable federal, State, and local regulations to ensure proper use,

storage, and disposal of hazardous substances. Such uses also would be subject to additional review and permitting requirements by the San Bernardino County Fire Department. Similarly, any other developments in the area proposing the construction of uses with the potential for use, storage, or transport of hazardous materials also would be required to comply with applicable federal, State, and local regulations, and such uses would be subject to additional review and permits from their local oversight agency. Therefore, the potential for release of toxic substances or hazardous materials into the environment, either through accidents or due to routine transport, use, or disposal of such materials, would not be cumulatively considerable.

The Project Site is not located within one-quarter mile of a school; therefore, the Project has no potential effect on students in relation to the use, handling, and transport of hazardous materials and would have no impact.

The Project Site is not located on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development or re-development of contaminated property.

As discussed above under the response to Threshold "e," the Project is not a noise-sensitive land use and would not be adversely affected by noise from operations at the San Bernardino International Airport. In addition, the Project would not introduce any land use to the Project Site that would conflict with the San Bernardino International Airport. There are no noise sensitive land uses in proximity to the Project Site. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area and would not contribute to a cumulatively considerable impact associated with airport hazards.

The Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route; thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

As discussed above under Threshold "g," the Project Site is not located within or in close proximity to areas identified as being subject to wildland fire hazards and would have no potential to contribute to adverse, cumulative wildland fire hazards.

4.8.7 Significance of Impacts Before Mitigation

Thresholds "a" and "b:" Less than Significant Impact. During Project construction and operation, mandatory compliance with federal, State, and local regulations would ensure that the Project would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials.

Threshold "c:" No Impact. The Project site is not located within one-quarter mile of any existing or proposed school. Accordingly, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts to schools located more than one-quarter mile of the Project site would be less than significant.

Threshold "d:" No Impact. The Project Site is not located on any list of hazardous materials sites complied pursuant to Government Code Section 65962.5.

Threshold "e:" Less than Significant Impact. The Project would be compatible with the nearby San Bernardino International Airport. As such, the Project would not result in an airport safety hazard for people residing or working in the Project area.

Threshold "f:" Less than Significant Impact. The Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route. During construction and long-term operation, adequate emergency vehicle access is required to be provided. Accordingly, implementation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan.

Threshold "g:" No Impact. The Project Site is not located in close proximity to wildlands or areas with high fire hazards. Thus, the Project would not expose people or structures to a significant wildfire risk.

4.8.8 Mitigation

The Project would result in less than significant impacts related to hazards and hazardous materials and no mitigation is required.

4.9 HYDROLOGY & WATER QUALITY

Information in this Subsection relies on two technical reports prepared for the Project by Thienes Engineering, Inc. (hereinafter, "Thienes"): 1) "Preliminary Hydrology Calculations for Nevada Street Industrial Development," dated December 17, 2021 (Thienes, 2021a); and 2) "Preliminary Water Quality Management Plan for LDC Nevada Redlands," dated December 17, 2021 (Thienes, 2021b). These reports are provided as *Technical Appendices L and M*, respectively, to this EIR. All other information sources referenced in this Subsection are listed in EIR Section 7.0, *References*.

The Project Site is located within the Santa Ana River watershed and is under the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). As such, information for this Subsection also was obtained from the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* (Basin Plan, updated June 2019) and the *Integrated Regional Water Management Plan* (IRWMP) for the Santa Ana River watershed (also referred to as "One Water One Watershed Plan Update 2018," (February 19, 2019) prepared by the Santa Ana Watershed Project Authority (SAWPA). These documents are herein incorporated by reference and are available for public review at the physical locations and website addresses given in EIR Section 7.0.

4.9.1 EXISTING CONDITIONS

A. Regional Hydrology

The Project Site is located within the 2,650-acre Santa Ana River watershed. Within the Santa Ana River watershed, the Santa Ana River is the principal surface flow water body within the region. The Santa Ana River rises in Santa Ana Canyon in the southern San Bernardino Mountains and runs southwesterly across San Bernardino, Riverside, and Orange Counties, where it discharges into the Pacific Ocean at the City of Huntington Beach. The total length of the Santa Ana River and its major tributaries is approximately 700 miles. The location of the Project Site within the Santa Ana River watershed is illustrated on Figure 4.9-1, *Santa Ana River Watershed Map*.

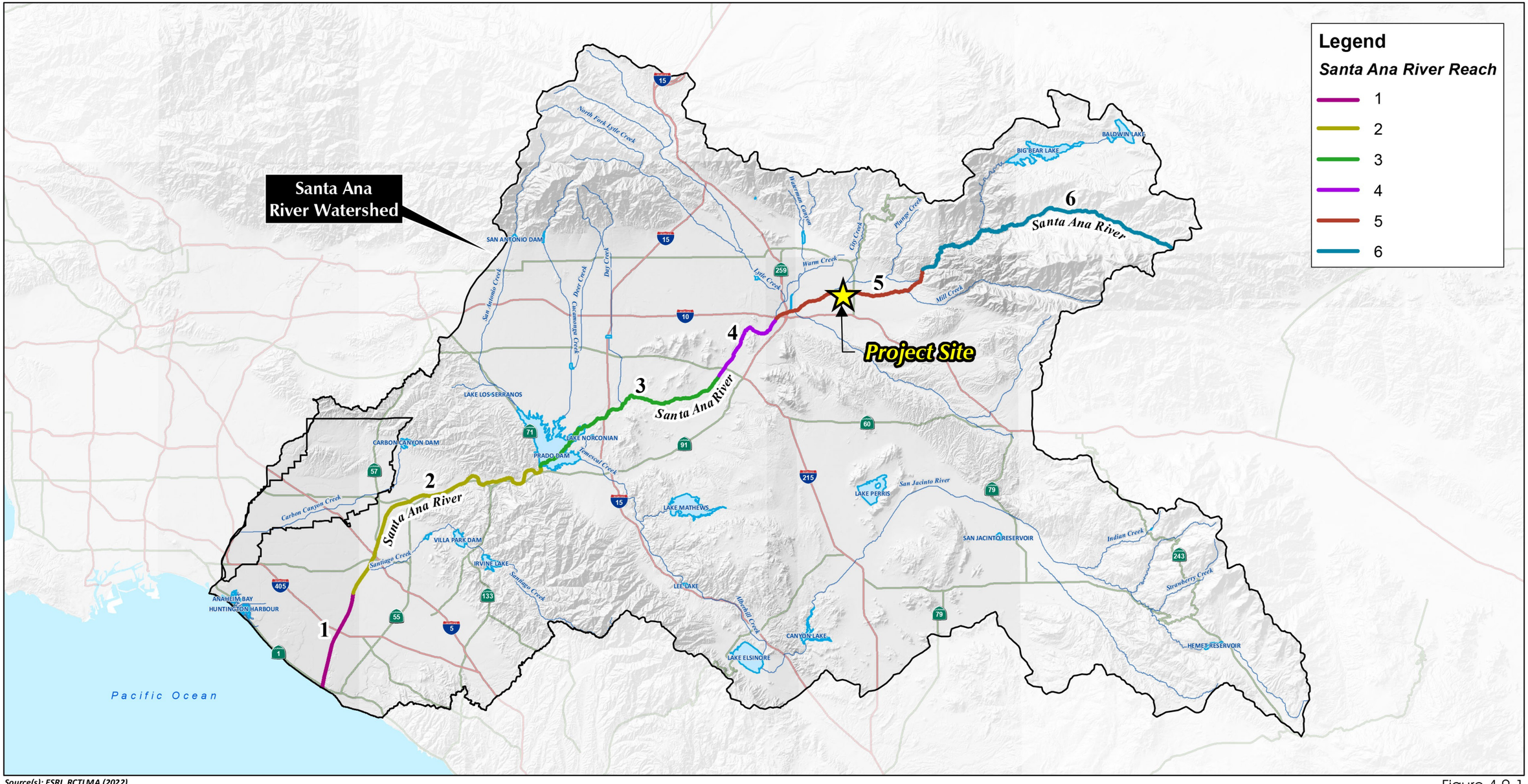
B. Site Hydrology

The Project Site's existing stormwater drainage pattern is illustrated on Figure 4.9-2, *Existing Conditions Hydrology Map*. Under existing conditions, the Project Site drains to the northwest. Rainfall runoff sheet flows across the Project Site to Nevada Street; most of the runoff from the Site surface drains from Nevada Street to the Santa Ana River while a small portion of the runoff from the Site is collected by an existing catch basin within Nevada Street. The peak runoff flow rate from the Project Site during 100-year storm conditions is approximately 21.4 cubic feet per second (cfs) under existing conditions. (Thienes, 2021a, p. 1)

C. Flooding and Dam Inundation

According to the FEMA FIRM No. 06071C8704H, the Project Site is located within FEMA Flood Zone X. Flood Zone X is correlated with areas of minimal flood hazard, determined to be less than the 0.2 percent annual chance flood (FEMA, 2014).

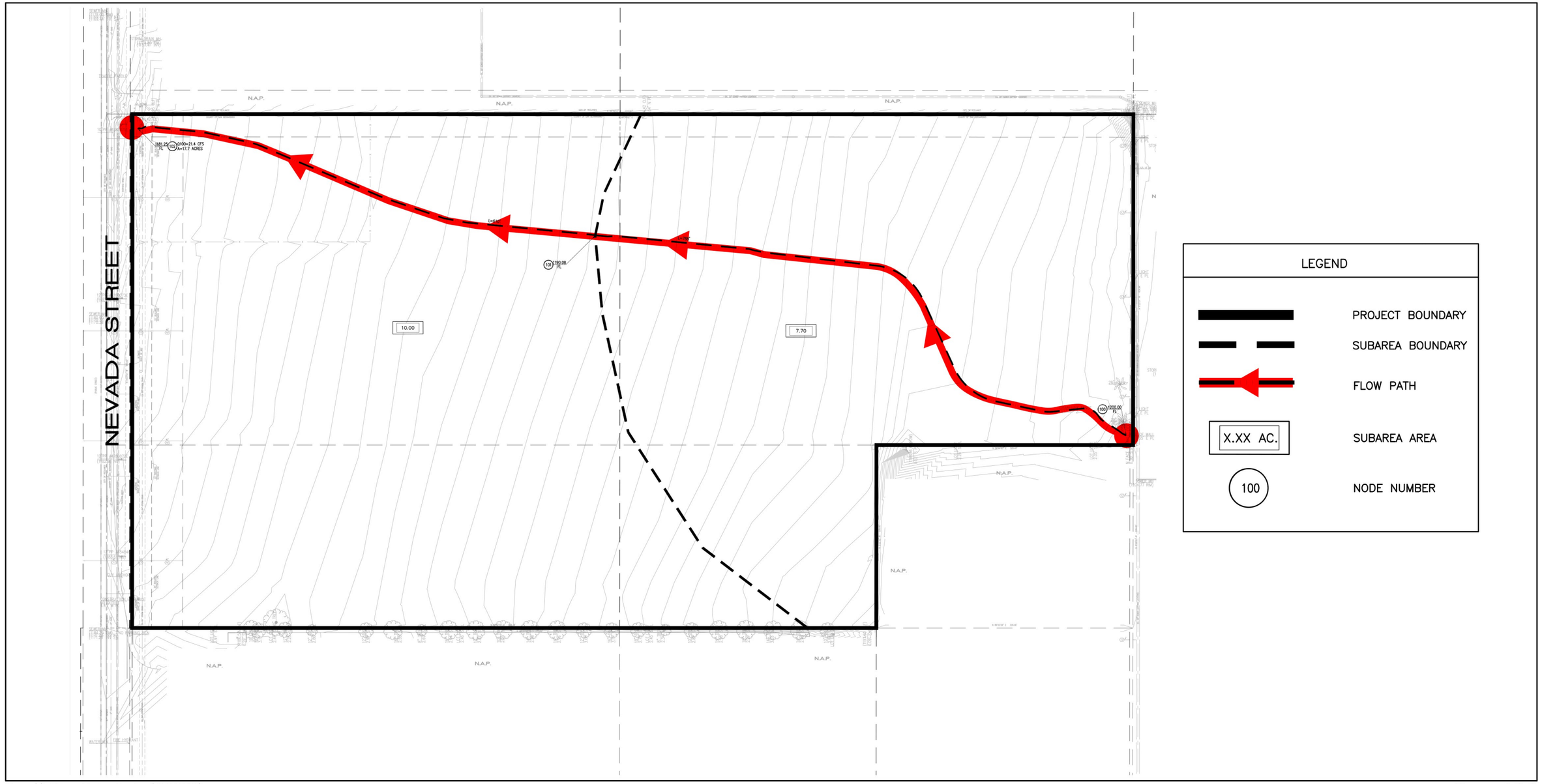
According to the Countywide Plan, the Project Site is not located within any mapped dam inundation area (San Bern. Co., 2020a; Policy Map HZ-3).



Source(s): ESRI, RCTLMA (2022)

Figure 4.9-1

Santa Ana River Watershed Map



Source(s): Thienes Engineering, Inc. (09-07-2021)

Figure 4.9-2

Not to Scale

Exisiting Conditions Hydrology Map

D. Water Quality

The Federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act, CWA) requires all states to conduct water quality assessments of their water resources to identify water bodies that do not meet water quality standards. Water bodies that do not meet water quality standards due to excessive concentrations of pollutants are placed on a list of impaired waters pursuant to Section 303(d) of the CWA.

The Project Site's receiving waters include the Santa Ana River Reaches 1-5, Prado Dam, and Pacific Ocean (as shown on Figure 4.9-1). Of the Project Site's receiving waters, the Santa Ana River Reach 4 is included on the CWA's Section 303(d) list of impaired waters because of bacterial indicators; the Santa Ana River Reach 3 is included on the CWA's Section 303(d) list of impaired waters because of excessive copper, lead, and bacterial indicators, and the Prado Dam is included on the CWA's Section 303(d) list of impaired waters because of pH (acidity/basic) (Thienes, 2021b, p. 3-3).

E. Groundwater

The Project Site and surrounding area are underlain by the Upper Santa Ana Valley Groundwater Basin. The Project Site is specifically located within the Bunker Hill Subbasin. The groundwater table beneath the Project site has ranged between 167 and 208 feet below the ground surface (SCG, 2021, p. 7).

4.9.2 Regulatory Setting

The following is a brief description of the federal, state, and local environmental laws and related regulations related to hydrology and water quality.

A. Federal Plans, Policies, and Regulations

1. Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the EPA has implemented pollution control programs such as setting wastewater standards for industry, and also has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man- made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. (EPA, 2020a)

B. State Plans, Policies, and Regulations

1. Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water (SWRCB, 2014). The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code Section 13000 *et seq*.), the policy of the State is as follows:

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine RWQCBs (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and RWQCBs have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The RWQCBs regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The SWRCB and the RWQCBs can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the RWQCBs and are updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project Site is located in the Santa Ana River Watershed, which is within the purview of the Santa Ana RWQCB. The Santa Ana's RWQCB's *Santa Ana River Basin Water Quality Control Plan* is the governing water quality plan for the region.

2. California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies (CA Legislative Info, n.d.). The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (Sections 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW.

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

3. California Toxics Rule (CTR)

The California Toxics Rule (CTR) fills the gap in California's water quality standards necessary to protect human health and aquatic life beneficial uses (SWRCB, 2016, pp. 14-15). The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that EPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

4. Watershed Management Initiative (WMI)

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts. The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups. (SWRCB, 2017)

5. Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge (DWR, n.d.). Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins (DWR, 2020). For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability.

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to stormwater drainage, natural environmental hazards (i.e., flooding), and groundwater resources. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Infrastructure & Utilities Element

Goal IU-1: Water Supply. Water supply and infrastructure are sufficient for the needs of residents and businesses and resilient to drought.

Policy IU-1.7: Areas vital for groundwater recharge. We allow new development on areas vital for groundwater recharge when stormwater management facilities are installed onsite and maintained to infiltrate predevelopment levels of stormwater into the ground.

Policy IU-1.8: Groundwater management coordination. We collaborate with watermasters, groundwater sustainability agencies, water purveyors, and other government agencies to ensure groundwater basins are being sustainably managed. We discourage new development when it would create or aggravate groundwater overdraft conditions, land subsidence, or other "undesirable results" as defined in the California Water Code. We require safe yields for groundwater sources covered by the Desert Groundwater Management Ordinance.

Goal IU-3: Stormwater Drainage. A regional stormwater drainage backbone and local stormwater facilities in unincorporated areas that reduce the risk of flooding.

Policy IU-3.2: Local flood control. We require new development to install and maintain stormwater management facilities that maintain predevelopment hydrology and hydraulic conditions.

Natural Resources Element

Goal HZ-1: Natural Environmental Hazards. Minimized risk of injury, loss of life, property damage, and economic and social disruption caused by natural environmental hazards and adaptation to potential changes in climate.

Policy HZ-1.2: New development in environmental hazard areas. We require all new development to be located outside of the environmental hazard areas listed below. For any lot or parcel that does not have sufficient buildable area outside of such hazard areas, we require adequate mitigation, including designs that allow occupants to shelter in place and to have sufficient time to evacuate during times of extreme weather and natural disasters.

- Flood: 100-year flood zone, dam/basin inundation area
- Geologic: Alquist Priolo earthquake fault zone; County-identified fault zone; rockfall/debris-flow hazard area, medium or high liquefaction area (low to high and localized), existing and County-identified landslide area, moderate to high landslide susceptibility area)
- Fire: high or very high fire hazard severity zone

Policy HZ-1.4: 500-year flood zone. We may collaborate with property owners in the Valley region to establish funding and financing mechanisms to mitigate flood hazards in identified 500-year flood zones.

Policy HZ-1.8: Wind erosion hazards. We require new development in medium-high or high wind erosion hazard areas to minimize the effects of wind-blown soil through building and site design features such as fencing, surface treatment or pavement, attenuation or wind barriers, architectural features, building materials, and drought resistant landscaping.

2. San Bernardino County Development Code

The San Bernardino County Development Code (Section 85.11.030) also requires development projects to incorporate an erosion control plan into proposed clearing/grubbing, stockpile, grading, or demolition activities to minimize water- and windborne erosion. The erosion control plan is required to be approved by County staff prior to the issuance of the applicable construction permit.

3. San Bernardino County Code of Ordinances

The San Bernardino County Code of Ordinances (Section 35.0118) requires all projects subject to the MS4 permit to prepare and submit a Water Quality Management Plan (WQMP), which shall include proposed

structural best management practices (BMPs) and source and treatment control BMPs to infiltrate and/or adequately treat the projected stormwater and urban runoff for the development project.

4. SCAQMD Rule 403 (Fugitive Dust)

SCAQMD Rule 403 (Fugitive Dust) requires the implementation of best available dust control measures during active operations capable of generating fugitive dust. The purpose of this Rule is to minimize the amount of particulate matter in the ambient air as a result of anthropogenic fugitive dust sources (SCAQMD, 2005).

4.9.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical adverse hydrology and water quality effects that could result from development projects. The Project would result in a significant impact to hydrology and water quality if the Project or any Project-related component would:

a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;*

b. *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;*

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

   i. *Result in substantial erosion or siltation on- or off-site;*

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

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

   iv. *Impede or redirect flood flows;*

d. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or*

e. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

4.9.4 Methodology for Evaluating Hydrology & Water Quality Impacts

The analysis of potential hydrology and water quality-related impacts is based upon the hydrology calculations and preliminary water quality management plan prepared specifically for the Project Site. The hydrology calculations were prepared using the San Bernardino County Rational Method program (AES software). The preliminary water quality management plan for the Project was prepared based on the technical guidance document for water quality management plans within the Santa Ana River Watershed and utilizes the water quality management plan template for the Santa Ana River Watershed, both published by San Bernardino

County. The Countywide Plan and information sources from State and Federal agencies were researched to establish the Project Site's existing conditions and likelihood of environmental effects.

4.9.5 IMPACT ANALYSIS

Threshold "a:" Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The Project Applicant would be required to comply with Section 402 of the Clean Water Act, which authorizes the NPDES permit program that covers point sources of pollution discharging to a water body. The NPDES program would require the Project Applicant and/or construction contractor to prepare a SWPPP and obtain authorization to discharge stormwater under an NPDES construction stormwater permit because the Project would result in construction on a site that is larger than one acre. The Project Applicant also would be required to comply with regional and local requirements to implement the California Porter-Cologne Water Quality Control Act (Section 13000 *et seq.*, of the California Water Code), which requires that comprehensive regional water quality control plans be developed for all waters within the State of California (such as the Basin Plan and the IRWMP for the Santa Ana River Watershed). The Project Site is located within the jurisdiction of the Santa Ana RWQCB.

A. Construction-Related Water Quality Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities, which have the potential to generate silt, debris, organic waste, chemicals, paints, and other solvents; should these materials come into contact with water that reaches the groundwater table or flows off-site, the potential exists for the Project's construction activities to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during Project construction in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the San Bernardino County Code of Ordinances (Section 35.0118), the Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one (1) acre of total land area. Compliance with the NPDES permit program involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP will specify the Best Management Practices (BMPs) that the Project's construction contractors would be required to implement during construction activities to ensure that potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. Additionally, pursuant to the County's Development Code (Section 85.11.030), the Project Applicant also would be required to implement an erosion control plan to minimize water- and windborne erosion. Mandatory compliance with the SWPPP and the erosion control plan would ensure that the Project's construction does not violate any water quality standards or waste discharge requirements. Therefore, water quality impacts associated with construction activities would be less than significant.

B. Post-Development Water Quality Impacts

Stormwater pollutants that may be produced during Project operation include pathogens (bacterial/virus), phosphorous, nitrogen, noxious aquatic plants, sediment, metals, oil/grease, trash/debris, pesticides/herbicides, and organic compounds. The expected pollutants of concern for the Project are pathogens, nitrogen, and metals. (Thienes, 2021b, p. 2-2)

The Project Applicant would be required to prepare and implement a Water Quality Management Plan (WQMP) to demonstrate compliance with the County's NPDES municipal stormwater permit, and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a Site-specific post-construction water quality management program designed to address the potential release of pollutants of concern for downstream receiving waters and other water pollutants through the use of BMPs. Implementation of the WQMP ensures on-going, long-term protection of the watershed basin. The preliminary WQMP for the Project was prepared by Thienes and is included as *Technical Appendix M* to this EIR. As identified in the preliminary WQMP, the Project is designed to include structural source control BMPs that include an underground infiltration system, as well as operational source control BMPs (including but not limited to: the installation of water-efficient landscape irrigation systems, storm drain system stenciling and signage, and implementation of a trash and waste storage areas) to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged into the municipal storm drain system. Compliance with the preliminary WQMP would be required as a condition of Project approval pursuant to County Code of Ordinances Section 35.0118, and long-term maintenance of on-Site BMPs would be required to ensure their long-term effectiveness.

Additionally, the NPDES program requires certain land uses, including the industrial land uses proposed by the Project, to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted a new NPDES permit for storm water discharge associated with industrial activities (referred to as the "Industrial General Permit"). This permit was amended in 2015 and 2018 and is effective as of as of July 1, 2020. (SWRCB, 2020). Under this currently effective NPDES Industrial General Permit, the Project would be required to prepare a SWPPP for operational activities and implement a long-term water quality sampling and monitoring program or receive an exemption. Because the permit is dependent upon a detailed accounting of all operational activities and procedures, and the Project's building users and their operational characteristics are not known at this time, details of the operational SWPPP (including BMPs) or potential exemption to the SWPPP operational activities requirement cannot be determined with certainty at this time. However, based on the performance requirements of the NPDES Industrial General Permit, the Project's mandatory compliance with all applicable water quality regulations would further reduce potential water quality impacts during long-term operation.

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

Threshold "b:" ***Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

The Project would connect to the City of Redlands' 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. Water demands for operational needs are typically minimal for warehousing activities (refer to EIR Subsection 5.4.7 for additional information regarding the Project's anticipated water demand). Implementation of the 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 would increase impervious surface coverage on the Project Site which would, in turn, reduce the amount of water percolating into the groundwater basin (Upper Santa Ana Valley, Bunker Hill subbasin) that underlies the Project Site. Recharge to the Bunker Hill subbasin primarily occurs from Santa Ana River, Mill Creek, and Lytle Creek with Cajon Creek, San Timoteo Creek, and most of the creeks flowing southward out of the San Bernardino Mountains as lesser contributors (DWR, 2004). The Project would not physically impact any of the major sources of groundwater recharge in the Subbasin. Therefore, the Project would not result in substantial, adverse effects to local groundwater levels.

Additionally, the Project includes design features that would maximize the percolation of on-site storm water runoff into the groundwater basin, such as permeable landscape areas. Accordingly, buildout of the Project with these design features would not interfere substantially with groundwater recharge or impede sustainable groundwater management of the Bunker Hill subbasin. Based on the foregoing information, the Project would not interfere substantially with groundwater recharge.

For the reasons stated above, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin. Impacts would be less than significant.

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

i. Result in substantial erosion or siltation on- or off-site?

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

iii. Create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

iv. Impede or redirect flood flows?

The Project would include the installation of an integrated system of underground storm drain pipes, catch basins, and an underground infiltration system on the Project Site. The proposed storm drain system is intended to capture and convey stormwater runoff across the Project Site, and treat the runoff to minimize water-borne

pollutants carried from the Site (the Project's stormwater drainage concept is described in detail in EIR Section 3.0, *Project Description*). Figure 4.9-3, *Proposed Post-Development Hydrology Map*, illustrates the post-development drainage conditions on the Project Site, while EIR Figure 3-9 (previously presented) depicts the location of the proposed catch basins, on-site storm drain pipes, and the underground infiltration system. Upon development of the Project, all stormwater from the Project Site would be discharged to an existing 84-inch-diameter storm drain pipe beneath Nevada Street.

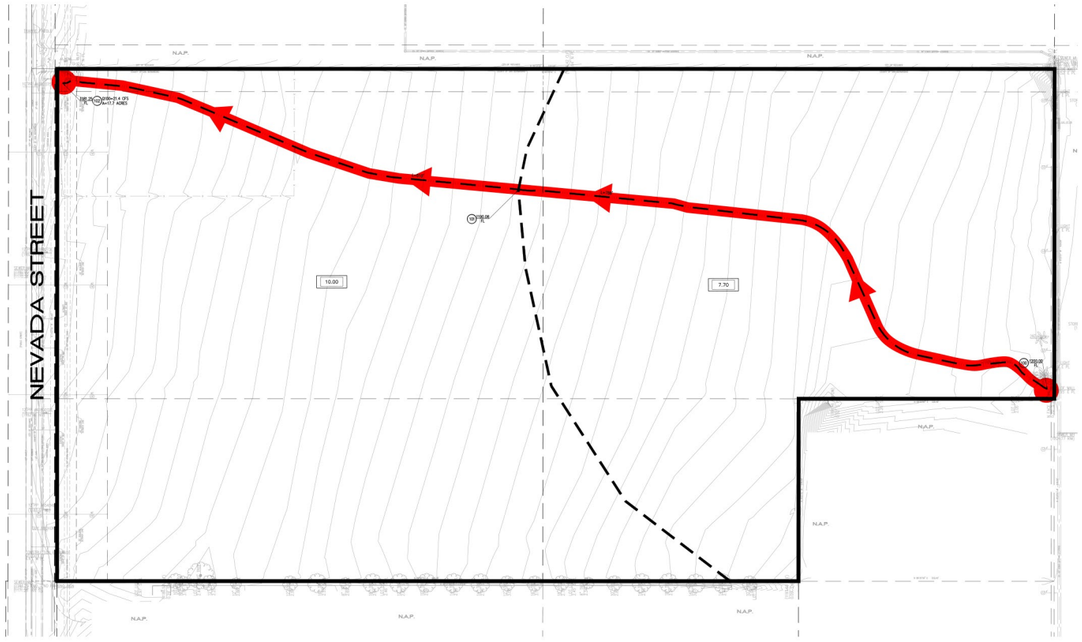
The following analysis evaluates the potential for Project-related development activities to adversely affect water quality or cause or exacerbate local flooding.

A. Erosion and Siltation

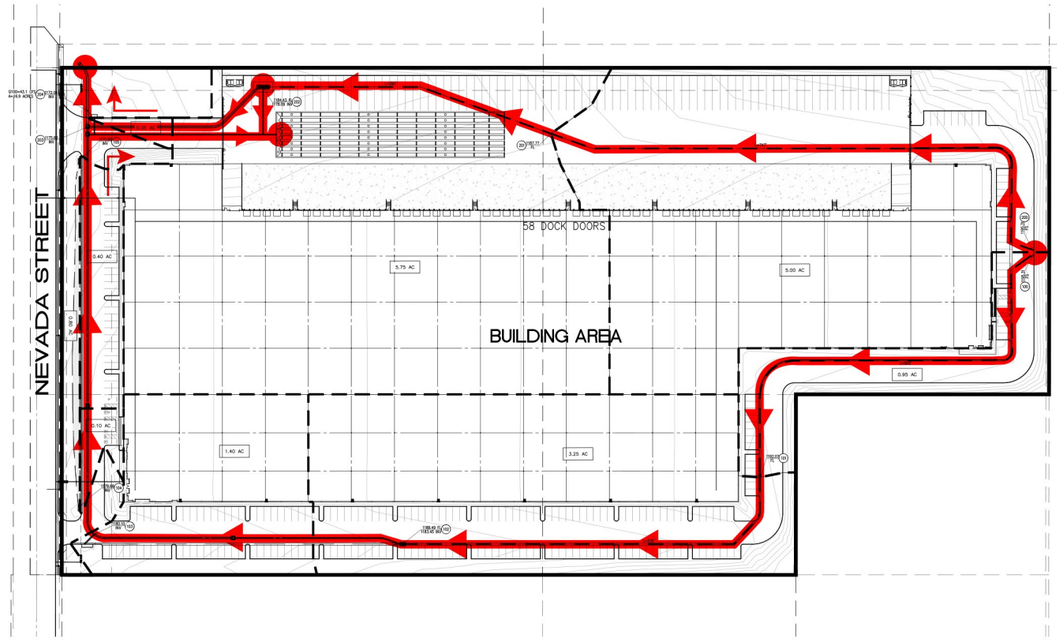
Although the grading proposed by the Project would alter the Project Site's existing ground contours and the drainage patterns within the Project Site boundaries, such changes would not result in substantial erosion or siltation on- or off-site. Pursuant to the requirements of the State Water Resources Control Board, the Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. Compliance with the NPDES permit program involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The SWPPP will specify the BMPs that the Project Applicant will be required to implement during construction activities to ensure that waterborne pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated prior to surface runoff being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. Lastly, the Project would be required to implement an erosion and dust control plan pursuant to County Development Code Section 85.11.030 (and to ensure compliance with SCAQMD Rule 403) to minimize water- and windborne erosion. Mandatory compliance with the SWPPP and the erosion control plan would ensure that the Project's implementation does not violate any water quality standards or waste discharge requirements during construction activities. Based on the foregoing information, water quality impacts associated with Project construction activities would be less than significant.

During operation of the Project, the Project Applicant would be required to prepare and implement a WQMP, which is a Project Site-specific post-construction water quality management program that will be implemented to minimize erosion and siltation, pursuant to County Code of Ordinances Section 35.0118. The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The WQMP also is required to establish a post-construction implementation and maintenance plan to ensure on-going, long-term erosion protection. Compliance with the WQMP is required as a condition of approval for the Project, as is the long-term maintenance of erosion and sediment control features. The preliminary WQMP for the Project is provided as *Technical Appendix M* to this EIR. Because the Project Applicant would be required to utilize erosion and sediment control measures to preclude substantial, long-term soil erosion and loss of topsoil, Project operation would result in less than significant impacts related to soil erosion and sedimentation.

EXISTING



PROPOSED



LEGEND	
▬▬▬	PROJECT BOUNDARY
▬ ▬ ▬	SUBAREA BOUNDARY
▬▬▬	FLOW PATH
X.XX AC.	SUBAREA AREA
100	NODE NUMBER

Source(s): Thienes Engineering, Inc. (12-17-2021)

Figure 4.9-3

Not to Scale

Proposed Post-Development Hydrology Map

B. Stormwater Runoff Discharge

The Project's storm drain system is designed to capture all stormwater runoff originating on the Project Site and convey these flows to an existing storm drain beneath Nevada Street. The existing storm drain beneath Nevada Street discharges to the Santa Ana River, which is located approximately 1,200 feet north of the Project Site. The Sana Ana River receives all stormwater runoff from the Project Site under existing conditions as surface drainage flow from Nevada Street.

Upon Project buildout, approximately 43.1 cfs of stormwater runoff would be discharged from the Project Site during peak storm conditions to the existing storm drain beneath Nevada Street; this discharge volume represents an approximately 101 percent increase from existing discharge rates (Thienes, 2021a). The Project is not required to provide detention basins to attenuate peak on-site runoff flow volumes to pre-development levels due to the proximity of the subject property to the Santa Ana River. Were the Project to include detention basins, the discharge of stormwater flows from the Project Site to the Santa Ana River would be delayed during peak storm events. Delaying the discharge of stormwater runoff from the Project Site is not desirable because, as a result, runoff would discharge to the Santa Ana River closer to the River's peak flow rate, which could expose areas downstream of the Project Site to an increased risk of flooding. Accordingly, the design of the Project would minimize the risk of on- and off-site flooding during long-term development conditions, and alterations to the drainage characteristics of the Project site (i.e., drainage pattern and flow rate) are less than significant.

C. Stormwater Drainage System Capacity & Polluted Runoff

The public storm drain that is installed beneath Nevada Street under existing conditions has been constructed to accommodate peak storm runoff flows from the Project Site and surrounding area under buildout conditions (Thienes, 2021a). The storm drain discharges to the Santa Ana River, which is located approximately 1,200 feet north of the Project Site. The Sana Ana River receives all stormwater runoff from the Project Site under existing conditions as surface drainage flow from Nevada Street. Accordingly, the Project would not create or contribute runoff that would exceed the capacity of any existing storm water drainage system, and impacts would be less than significant.

As discussed in detail under Threshold "a" and earlier under this Threshold (refer to sub-item "A"), the Project's construction contractors would be required to comply with a SWPPP and the Project's owner or operator would be required to comply with a SWQMP to ensure that Project-related construction activities and operational activities do not result in substantial amounts of polluted runoff. The Project would not result in substantial additional sources of polluted runoff and impacts would be less than significant.

D. Flood Flows

According to the FEMA FIRM No. 06071C8704H, the Project Site is not located in a special flood hazard area, rather the Site is located in an area outside of the 500-year (0.2% annual chance) floodplain (FEMA, 2014). 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 flood flows. No impact would occur.

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

The Pacific Ocean is located over 50 miles southwest of the Project Site; consequently, there is no potential for the Site to be impacted by a tsunami as ocean tsunamis typically only reach up to a few miles inland. The Project Site also is not subject to flooding hazards associated with a seiche because the nearest enclosed large body of surface water (Seven Oaks Dam) is located more than 7 miles east of the Site. Furthermore, as noted in the Countywide Plan, the Project Site is not located within any mapped dam inundation area (San Bern. Co., 2020a; Policy Map HZ-3). Because the Project Site cannot be affected by a tsunami, seiche, or dam inundation, there is no potential for such hazards to inundate the Project Site and cause a release of waterborne pollutants. No impact would occur.

Threshold "e:" ***Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

As discussed in Threshold "a" above, the Project Site is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's regulations by preparing and adhering to a SWPPP and WQMP. As also discussed in Threshold "a" above, implementation of the Project would not conflict with or obstruct the *Santa Ana River Basin Water Quality Control Plan* and impacts would be less than significant.

The Project Site is located within the Bunker Hill subbasin of the Upper Santa Ana Valley Groundwater Basin. Portions of the Bunker Hill subbasin, including the area where the Project Site is located, is part of the adjudicated San Bernardino Basin Area. Adjudicated basins, like the San Bernardino Basin Area, are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) because such basins already operate under a court-ordered management plan to ensure their long-term sustainability. No component of the Project would obstruct or prevent implementation of the management plan for the San Bernardino Basin Area. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

4.9.6 Cumulative Impact Analysis

The cumulative impact analysis considers construction and operation of the Project in conjunction with other development projects in the vicinity of the Project Site and projects located in the Santa Ana River Basin and the Bunker Hill subbasin and larger San Bernardino Basin Area.

A. Water Quality

Project construction and the construction of other projects in the cumulative study area would have the potential to contribute waterborne pollution, including erosion and siltation, to the Santa Ana River Watershed. Pursuant to the requirements of the State Water Resources Control Board and the Santa Ana RWQCB, all construction projects that disturb one (1) or more acres of land area are required to obtain coverage for construction activities under the State's General Construction NPDES Permit. In order to obtain coverage, an effective Site-specific SWPPP is required to be developed and implemented for all development projects over one acre. The SWPPP must identify potential on-site pollutants and identify an effective combination of erosion control and sediment

control measures to reduce or eliminate discharge of pollutants to surface waters. In addition, the Project Applicant and all cumulative developments in the Santa Ana River Basin would be required to comply with the RWQCB-established water quality standards for ground and surface waters of the region. Compliance with these mandatory regulatory requirements, would ensure that development projects within the Santa Ana River watershed, including the proposed Project, would not contribute substantially to water quality impairments during construction.

Operational activities on the Project Site would be required to comply with the Project's WQMP to minimize the amount of waterborne pollution, including erosion and sediment, discharged from the Site. Other development projects within the watershed would similarly be required by law to prepare and implement Site-specific WQMPs to ensure that runoff does not substantially contribute to water quality violations. Accordingly, operation of the Project would not contribute to cumulatively considerable water quality effects.

B. Groundwater Supplies and Management

The Project would not physically impact any of the major groundwater recharge facilities in the Bunker Hill subbasin and other development projects in the Bunker Hill subbasin similarly would be prohibited from resulting in adverse physical effects to recharge areas. The Project incorporates permeable landscape areas and other design features (i.e., an underground infiltration system) that would allow surface runoff to infiltrate into the groundwater basin. Other development projects would similarly be required by the lead agency for the project to incorporate design features (e.g., through minimum landscaped area requirements and site-specific WQMP requirements) that facilitate percolation and minimize surface runoff. Lastly, the Bunker Hill subbasin is part of the larger San Bernardino Basin Area, which is an adjudicated basin that operates under a court-ordered management plan to ensure the long-term sustainability of the Basin. No component of the Project would obstruct with or prevent implementation of the Basin's management plan and other development projects within the Basin would be prohibited from any activity that would endanger the health and sustainability of the groundwater basin. Based on the lack of impacts to groundwater recharge facilities, the provision of design measures that would facilitate percolation, and compliance with the Basin's groundwater management plan, cumulative development would not result in a considerable, adverse effect to local groundwater supplies.

C. Flooding

Construction of the Project and other development projects within the Santa Ana River Watershed would be required to comply with federal, State, and local regulations and applicable regional and local master drainage plans in order to mitigate flood hazards both on- and off-site. Compliance with federal, State, and local regulations and applicable drainage plans would require development sites to be protected from flooding during peak storm events (i.e., 100-year storm) and also would not allow development projects to expose downstream properties to increased flooding risks during peak storm events. In addition, future development proposals within the Santa Ana River Watershed would be required to prepare hydrologic and hydraulic calculations, subject to review and approval by the responsible City/County Engineer, to demonstrate that substantial on- and/or off-site flood hazards would not occur. As discussed under the response to Threshold "c," the Project is designed to ensure that runoff from the Project Site during peak storm events is substantially reduced relative to existing conditions. Because the Project and all other developments throughout the Santa

Ana River Basin, would need to comply with federal, State, and local regulations to ensure that stormwater discharges do not substantially exceed existing volumes or exceed the volume of available conveyance infrastructure, a substantial cumulative impact related to flood hazards would not occur.

Additionally, the Project Site is not located within a special flood hazard area or in an area subject to inundation. Accordingly, development on the Project Site would have no potential to impede or redirect flood flows and a cumulatively considerable impact would not occur.

4.9.7 Significance of Impacts Before Mitigation

Threshold "a:" Less than Significant Impact. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Adherence to a SWPPP and WQMP is required as part of the Project's implementation to address construction- and operational-related water quality.

Threshold "b:" Less than Significant Impact. The Project would not physically impact any of the major groundwater recharge facilities in the Bunker Hill subbasin. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the Basin.

Threshold "c:" Less than Significant Impact. The Project would be required to comply with applicable water quality regulatory requirements to minimize erosion and siltation. Additionally, the Project would not result in flooding on- or off-site or impede/redirect flood flows. Lastly, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Threshold "d:" No Impact. The Project Site would not be subject to inundation from tsunamis, seiches, or other hazards.

Threshold "e:" Less than Significant Impact. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.8 Mitigation

Impacts would be less than significant; therefore, mitigation is not required.

4.10 NOISE

This Subsection addresses the environmental issue of noise, including existing noise levels in the Project area and the Project's potential to introduce new or elevated sources of noise. The analysis contained herein incorporates information contained in a technical report prepared by Urban Crossroads, Inc., titled "Nevada Street Warehouse Noise Impact Analysis" ("Noise Analysis") and dated May 31, 2022 (Urban Crossroads, 2022e). The report is included as *Technical Appendix N* to this EIR. Refer to Section 7.0, *References*, for a complete list of reference sources used in the analysis presented in this Subsection.

4.10.1 EXISTING CONDITIONS

A. Noise Fundamentals

1. Noise Definitions

Noise is simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes physical harm, or when it has adverse effects on health. Because the range of sound that the human ear can detect is large, the scale used to measure sound intensity is based on multiples of 10, the logarithmic scale. The unit of measure to describe sound intensity is the decibel (dB). A sound increase of 10 dB represents a ten-fold increase in sound energy and is perceived by the human ear as being roughly twice as loud. A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise sources by discriminating against very low and very high frequencies of the audible spectrum (i.e., frequencies that are not audible to the human ear). The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at a distance of three feet is roughly 60 dBA, while a jet engine is 110 dBA at approximately 100 feet. (Urban Crossroads, 2022e, p. 7-8)

2. Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most used noise descriptor is the equivalent level (L_{eq}). L_{eq} represents a steady-state sound level and is not measured directly but is calculated from sound pressure levels typically measured in dBA. Consequently, L_{eq} can vary depending on the time of day. (Urban Crossroads, 2022e, p. 8)

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may cause a disturbance if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of five (5) decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources. (Urban Crossroads, 2022e, p. 8)

3. Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on geometric spreading, ground absorption, atmospheric effects, shielding, and reflection.

4. Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (Urban Crossroads, 2022e, p. 8)

5. Ground Absorption

The path of travel for noise to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (Urban Crossroads, 2022e, pp. 8-9)

6. Atmospheric Effects

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Other factors that may affect noise levels include air temperature, humidity, and turbulence. (Urban Crossroads, 2022e, p. 9)

7. Shielding

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Solid objects or barriers are most effective at attenuating noise levels. Effective noise barriers can reduce noise levels by 10 to 15 dBA. Noise barriers, however, do have limitations. For a noise barrier to work, it must be high enough and long enough to block the path of the noise source. Shielding by trees and other such vegetation that blocks the line-of-sight typically provides the perception of reduction noise levels; however, for vegetation to provide a noticeable noise reduction (up to 5 dBA of noise reduction), the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. (Urban Crossroads, 2022e, p. 9).

8. Reflection

Reflection from barriers and buildings does not substantially increase noise levels. If all the noise striking a structure was reflected back to a given receiving point, the increase would be theoretically limited to 3 dBA. Further, not all the acoustical energy is reflected back to same point. Some of the energy would go over the structure, some is reflected to points other than the given receiving point, some is scattered by ground coverings (e.g., grass and other plants), and some is blocked by intervening structures and/or obstacles (e.g., the noise source itself). (Urban Crossroads, 2022e, p. 9)

9. Response to Noise

Approximately 15 percent of the population has a very low tolerance for noise and will object to any noise not of their own making, even in the quietest environment, while approximately 20 to 30 percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to noise in any given environment. Despite this variability in behavior on an individual level, the population as a whole can be expected to exhibit the following responses to changes in noise levels: an increase of 1 dBA cannot be perceived except in carefully controlled laboratory experiments; a change of 3 dBA is considered "barely perceptible;" and a change of 5 dBA is considered "readily perceptible." (Urban Crossroads, 2022e, p. 10)

10. Vibration

Vibration is the periodic oscillation of a medium or object. Sources of groundborne vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency. Vibration is often described in units of velocity (inches per second) and decibels (dB) and is denoted as VdB. (Urban Crossroads, 2022e, p. 11)

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. (Urban Crossroads, 2022e, p. 11)

B. Existing Study Area Ambient Noise Conditions

Urban Crossroads collected 24-hour noise readings at three (3) representative locations in the Project Site vicinity. The noise measurement locations are identified in Figure 4.10-1, *Noise Measurement Locations*. The results of the existing noise level measurements are summarized below.

- Location L1 represents the noise levels southeast of the Project Site near Citrus Valley High School at 800 West Pioneer Avenue. Collected measurements at Location L1 show an average daytime noise level of 52.6 dBA L_{eq} and an average nighttime noise level of 54.3 dBA L_{eq}. (Urban Crossroads, 2022e, p. 24)

- Location L2 represents the noise levels southeast of the Project Site near the Residence Inn by Marriott Loma Linda-Redlands at 27351 San Bernardino Avenue. The noise level measurements collected at Location L2 show an average daytime noise level of 67.2 dBA L_{eq} and an average nighttime noise level of 64.8 dBA L_{eq}. (Urban Crossroads, 2022e, p. 24)

- Location L3 represents the noise levels located south of the Project Site near the Packinghouse Christian Academy at 9700 Alabama Street. The noise level measurements collected at Location L3 show an average daytime noise level of 75.2 dBA L_{eq} and an average nighttime noise level of 73.5 dBA L_{eq}. (Urban Crossroads, 2022e, p. 21)

Noise measurement worksheets for the hourly noise levels and the minimum and maximum observed noise levels at each measurement location are provided in the Noise Analysis (refer to *Technical Appendix N*). In general, the existing background ambient noise levels in the Project area are primarily from traffic noise associated with automobiles and truck traffic on the local arterial roadway network and periodic flight operations at the San Bernardino International Airport.

C. Existing Groundborne Vibration

Because the Project Site is vacant and due to the nature of the existing uses immediately abutting the Site – and the lack of heavy, impact machinery – there are no sources of groundborne vibration on the Project Site under existing conditions.

D. Existing Airport Noise

The Project Site is located approximately 0.60-mile southeast of the San Bernardino International Airport. The Project Site is not located within an existing safety compatibility zone for airport noise (San Bernardino County, 2019, p. 5.8-27). Based on planned buildout of the San Bernardino International Airport under the plan for the Eastgate Air Cargo Facility, the northern half of the Project Site would be located within the Airport's 60 dBA CNEL noise contour and the southern half of the Project Site would be located outside of the 60 dBA CNEL noise contour (Urban Crossroads, 2022e, pp. 17-18).

4.10.2 Regulatory Setting

The following is a brief description of the federal, State, and local environmental laws and regulations related to noise that are applicable to the Project, the Project Site, and/or the surrounding area.

A. Federal Plans, Policies, and Regulations

1. Noise Control Act of 1972

The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare (EPA, 2021). The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products.

Source(s): Urban Crossroads (05-31-2022)

Figure 4.10-1

Not to Scale

Noise Measurment Locations

While primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce, control of which require national uniformity of treatment. The Environmental Protection Agency (EPA) is directed by Congress to coordinate the programs of all Federal agencies relating to noise research and noise control.

2. Federal Transit Administration

The Federal Transit Administration (FTA) published a *Noise and Vibration Impact Assessment* manual, which provides guidance for preparing and reviewing the noise and vibration sections of environmental documents (FTA, 2006, pp. 1-1). The manual sets forth the methods and procedures for determining the level of noise and vibration impact resulting from most federally-funded transit projects and for determining what can be done to mitigate such impact.

The *Noise and Vibration Impact Assessment* manual also establishes criteria for acceptable ground-borne vibration, which are expressed in terms of root mean square (rms) velocity levels in decibels and the criteria for acceptable ground-borne noise are expressed in terms of A-weighted sound levels. As shown in Table 4.10-1, *Ground-Borne Vibration and Noise Impact Criteria*, the FTA identifies three categories of land uses and provides Ground-Based Vibration (GBV) and Ground-Based Noise (GBN) criteria for each category of land use.

Table 4.10-1 Ground-Borne Vibration and Noise Impact Criteria

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch /sec)			GBN Impact Levels (dB re 20 micro Pascals)		
	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]	Frequent Events[1]	Occasional Events[2]	Infrequent Events[3]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[4]	65 VdB[4]	65 VdB[4]	N/A[4]	N/A[4]	N/A[4]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Notes:

1. "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
2. "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
3. "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
4. This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.
5. Vibration-sensitive equipment is generally not sensitive to ground-borne noise.

Source: (FTA, 2006, Table 8-1)

3. Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency responsible for administering the Federal-aid highway program in accordance with Federal statutes and regulations. The FHWA developed the noise regulations as required by the Federal-Aid Highway Act of 1970 (Public Law 91-605, 84 Stat. 1713). The regulation, 23 CFR 772 *Procedures for Abatement of Highway Traffic Noise and Construction Noise*, applies to highway construction projects where a State department of transportation has requested Federal funding for participation in the project (FHWA, 2017). The regulation requires the highway agency to investigate traffic noise impacts in areas adjacent to federally-aided highways for proposed construction of a highway on a new location or the reconstruction of an existing highway to either significantly change the horizontal or vertical alignment or increase the number of through-traffic lanes. If the highway agency identifies impacts, it must consider abatement. The highway agency must incorporate all feasible and reasonable noise abatement into the project design.

The FHWA regulations for mitigation of highway traffic noise in the planning and design of federally aided highways are contained in Title 23 of the United States Code of Federal Regulations Part 772. The regulations contain noise abatement criteria, which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities. The regulations do not require meeting the abatement criteria in every instance. Rather, they require highway agencies make every reasonable and feasible effort to provide noise mitigation when the criteria are approached or exceeded. Compliance with the noise regulations is a prerequisite for the granting of Federal-aid highway funds for construction or reconstruction of a highway.

4. Construction-Related Hearing Conservation

The Occupational Safety and Health Administration (OSHA) hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes. Standard 29 CFR, Part 1910 indicates the noise levels under which a hearing conservation program is required to be provided to workers exposed to high noise levels (OSHA, 2002).

Note: Consistent with the CEQA Guidelines, this analysis does not evaluate the noise exposure of construction workers within the Project Site, and instead, evaluates the Project-related construction noise levels at the nearby sensitive receiver locations in the Project study area. Further, periodic exposure to high noise levels in short duration, such as Project construction, is typically considered an annoyance and not impactful to human health. It would take several years of exposure to high noise levels to result in hearing impairment.

B. State Plans, Policies, and Regulations

1. State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city in the State of California adopt a General Plan that includes a Noise Element, which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research.

2. OPR General Plan Guidelines

Though not adopted by law, the 2017 California General Plan Guidelines, published by the California Governor's OPR, provides guidance for local agencies in preparing or updating General Plans. The Guidelines provide direction on the required Noise Element portion of the General Plans. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. The OPR Guidelines state that General Plan policies and standards must be sufficient to serve as a guideline for compliance with sound transmission control requirements, and directly correlate to the Land Use, Circulation, and Housing Elements. The Guidelines also state that the Noise Element must be used to guide decisions concerning land use and the location of new roads and transit facilities since these are common sources of excessive noise levels. (OPR, 2017, pp. 131-132) The Countywide Plan addresses the topic of noise in the Hazards Element. Refer below for a discussion of the Countywide Plan.

3. Building Standards Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Standards Code (BSC, n.d.). These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources.

C. Local Plans, Policies, and Regulations

1. San Bernardino Countywide Plan

The Countywide Plan sets forth goals and policies related to noise as summarized below. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Hazards Element

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

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

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

2. San Bernardino County Development Code

❑ **Noise Standards**

Section 83.01.080 of the San Bernardino County Development Code establishes the County's acceptable noise levels for noise-sensitive and noise-generating land uses. The San Bernardino County Development Code does not identify a maximum noise limit for construction noise; but does establish standards for stationary noise and mobile source noise.

The County's standards for stationary noise are included in Development Code Section 83.01.080(c) and are summarized in Table 4.10-2.

Table 4.10-2 San Bernardino County Noise Standards for Stationary Noise Sources

Affected Land Uses (Receiving Noise)	7 am-10 pm Leq	10 pm-7 am Leq
Residential	55 dB(A)	45 dB(A)
Professional Services	55 dB(A)	55 dB(A)
Other Commercial	60 dB(A)	60 dB(A)
Industrial	70 dB(A)	70 dB(A)
Leq = (Equivalent Energy Level). The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period, typically 1, 8 or 24 hours.		
dB(A) = (A-weighted Sound Pressure Level). The sound pressure level, in decibels, as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound, placing greater emphasis on those frequencies within the sensitivity range of the human ear.		
Ldn = (Day-Night Noise Level). The average equivalent A-weighted sound level during a 24-hour day obtained by adding 10 decibels to the hourly noise levels measured during the night (from 10 pm to 7 am). In this way Ldn takes into account the lower tolerance of people for noise during nighttime periods.		

It should be noted that Table 4.10-2 establishes stationary noise standards for average noise energy (i.e., dBA L_{eq}). Development Code Section 83.01.080(c)(2) allows noise levels that exceed those listed in Table 4.10-2 over short periods of time, as summarized below:

- The noise standard for the receiving land use specified in Table 4.10-2 for a cumulative period of no more than 30 minutes in an hour (L_{50});
- The noise standard for the receiving land use specified in Table 4.10-2 plus 5 dBA for a cumulative period of no more than fifteen minutes in an hour (L_{25});
- The noise standard for the receiving land use specified in Table 4.10-2 plus 10 dBA for a cumulative period of no more than five minutes in an hour (L_8);
- The noise standard for the receiving land use specified in Table 4.10-2 plus 15 dBA for a cumulative period of more than one minute in an hour (L_2); and /or
- The noise standard for the receiving land use specified in Table 4.10-2 plus 20 dBA for any period of time.

The County's standards for stationary noise are included in Development Code Section 83.01.080(d) and are summarized in Table 4.10-3.

Table 4.10-3 San Bernardino County Noise Standards for Mobile Noise Sources

Land Use		Ldn (or CNEL) dB(A)	
Categories	Uses	Interior (1)	Exterior (2)
Residential	Single and multi-family, duplex, mobile homes	45	60 (3)
Commercial	Hotel, motel, transient housing	45	60 (3)
	Commercial retail, bank, restaurant	50	N/A
	Office building, research and development, professional offices	45	65
	Amphitheater, concert hall, auditorium, movie theater	45	N/A
Institutional/Public	Hospital, nursing home, school classroom, religious institution, library	45	65
Open Space	Park	N/A	65

Notes:
(1) The indoor environment shall exclude bathrooms, kitchens, toilets, closets and corridors.
(2) The outdoor environment shall be limited to:
- Hospital/office building patios
- Hotel and motel recreation areas
- Mobile home parks
- Multi-family private patios or balconies
- Park picnic areas
- Private yard of single-family dwellings
- School playgrounds

(3) An exterior noise level of up to 65 dB(A) (or CNEL) shall be allowed provided exterior noise levels have been substantially mitigated through a reasonable application of the best available noise reduction technology, and interior noise exposure does not exceed 45 dB(A) (or CNEL) with windows and doors closed. Requiring that windows and doors remain closed to achieve an acceptable interior noise level shall necessitate the use of air conditioning or mechanical ventilation.

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

❑ Vibration Standards

The San Bernardino County Development Code Section 83.01.090(a) establishes a maximum vibration standard of 0.2 inches per second (in/sec) peak particle velocity (PPV) when measured at or beyond the lot line.

3. San Bernardino International Airport Layout Plan

The *San Bernardino International Airport Layout Plan* identifies safety zones, noise impact zones, and overflight zones for areas near the San Bernardino International Airport. The Project Site is not located in any hazard zones due to airport flight operations or airport noise (San Bernardino County, 2019, p. 5.8-27).

4.10.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects related to hazards and hazardous materials that could result from development projects. The Project would result in a significant noise impact if the Project or any Project-related component would result in:

a. *Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;*

b. *Result in generation of excessive groundborne vibration or groundborne noise levels; or*

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.*

In relation to Threshold "a," Project-related construction activities would be subject to the applicable noise standards established by the Countywide Plan and/or Development Code. However, neither the Countywide Plan nor the Development Code define the levels at which a development project's temporary noise levels are considered substantial and, therefore, does not allow a quantified determination of potential noise impacts under CEQA. Accordingly, for purposes of this EIR, the construction noise standard from the FTA *Noise and Vibration Impact Assessment* manual of 80 dBA L_{eq} at a noise-sensitive receiver location is used as the threshold for determining whether daytime Project construction activities would result in a significant temporary noise impact. Refer to Subsection 3.4 of the Project's Noise Analysis (see *Technical Appendix N*) for a detailed discussion of the FTA standard. For potential nighttime Project construction activities, 45 dBA L_{eq} at a noise-sensitive receiver location, which is the noise level established by the Development Code (Section 83.01.080(c)) for operational noise levels, is used as the threshold for determining whether a significant temporary noise impact would occur.

In relation to Threshold "a," Project-related operational activities would be subject to the applicable noise standards established by the Countywide Plan and/or Development Code. Although the Development Code does establish maximum daytime and nighttime noise levels for the operation of residential, commercial, and industrial land uses, the Development Code does not define the levels at which a development project's permanent noise increases are considered substantial. Under Threshold "a," CEQA requires that consideration be given to the to the magnitude of the increase, the existing ambient noise levels, and the location of sensitive receptors in order to determine if a noise increase represents a substantial increase and thus a significant adverse environmental impact. For purposes of this EIR, the metric used to evaluate the significance of the Project's increase in ambient noise levels is adapted from the noise exposure criteria established by the Federal Interagency Committee on Noise (FICON). A detailed discussion of the FICON noise exposure criteria is provided in Subsection 4.1 of the Project's Noise Analysis. Accordingly, in consideration of the San Bernardino County Development Code (Section 83.01.080(c)) and the FICON noise exposure criteria, the Project would result in a significant noise impact during operation if any of the following conditions occur:

- If operational (stationary-source) noise levels exceed the exterior 55 dBA L_{eq} daytime or 45 dBA L_{eq} nighttime noise level standards at sensitive receptor land uses and the Project creates a noise level increase of greater than:
    - A 5 dBA or greater noise level increase at noise-sensitive receptors when the existing ambient noise level is less than 60 dBA CNEL;
    - A 3 dBA or greater noise level increase at noise-sensitive receptors when the existing ambient noise level is between 60.1 and 65 dBA CNEL; or
    - A 1.5 dBA or greater noise level increase at noise-sensitive receptors when the existing ambient noise levels exceeds 65.1 dBA CNEL.

The San Bernardino County Development Code (Section 83.01.090(a)) establishes vibration limits for activities on property in the County. For evaluation under Threshold "b," vibration levels are considered significant if Project-related activities would:

- Create or cause to be created any vibration activity that would exceed 0.2 in/sec PPV at a noise-sensitive receptor land use.

Based on exterior noise levels that are "normally acceptable" for industrial land uses, as documented in the EIR for the Countywide Plan, and indoor noise standard established by the Development Code, exposure to excessive noise levels from airport operations are considered significant pursuant to Threshold "c" if:

- The Project Site is located in the 70 CNEL dB noise contour (or above) and indoor noise levels cannot be attenuated to a level of 65 dBA Ldn.

4.10.4 Methodology for Calculating Project-Related Noise Impacts

A. Construction Noise Analysis Methodology

For the construction noise analysis, reference noise level measurements published in the FHWA Roadway Construction Noise Model (RCNM) were utilized. Based on guidance from the FTA *Noise and Vibration Impact Assessment* manual, all pieces of construction equipment used in each phase of construction were assumed to operate at the same time and a combined noise level for each construction phase was created using the CadnaA (Computer Aided Noise Abatement) noise prediction model and usage factors from the RCNM. Table 4.10-4, *Reference Construction Noise Levels*, provides a summary of the reference construction noise levels used for each stage of Project construction. Refer to Subsection 8.2 from the Project's Noise Analysis (see *Technical Appendix N*) for a detailed discussion of the derivation of assumed operational noise levels.

The construction noise analysis evaluates Project construction-related noise levels at the closest nearby receiver locations in the Project study area. Three (3) representative receiver locations were considered in the construction noise analysis, including a hotel abutting San Bernardino Avenue and two schools – one abutting Pioneer Avenue and one abutting Alabama Street. The receiver locations used in the construction noise analysis are shown on Figure 4.10-2, *Noise Receiver Locations*. The modeled noise-sensitive receiver

Table 4.10-4 Reference Construction Noise Levels

Construction Stage	Reference Construction Activity	Reference Noise Level @ 50 Feet (dBA L_{eq})[1]	Combined Noise Level (dBA L_{eq})[2]	Combined Sound Power Level (PWL)[3]
Site Preparation	Crawler Tractors	78	80	112
	Hauling Trucks	72		
	Rubber Tired Dozers	75		
Grading	Graders	81	83	115
	Excavators	77		
	Compactors	76		
Building Construction	Cranes	73	81	113
	Tractors	80		
	Welders	70		
Paving	Pavers	74	83	115
	Paving Equipment	82		
	Rollers	73		
Architectural Coating	Cranes	73	77	109
	Air Compressors	74		
	Generator Sets	70		

[1] FHWA Roadway Construction Noise Model (RCNM).
[2] Represents the combined noise level for all equipment assuming they operate at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calibrated using the CadnaA noise model at the reference distance to the noise source.
Source: (Urban Crossroads, 2022e, Table 8-1)

locations are representative of existing sensitive receptors nearest the Project Site. It is important to note that it is not necessary to calculate noise levels at every receiver location in proximity to the Project Site because receivers located at a similar distance from Project construction activities with similar ground elevations, orientation, and intervening physical conditions as the modeled receptor locations would experience the same or very similar noise effects as those presented herein, while receptors at a greater distance would experience lesser noise effects.

B. Stationary Noise Analysis Methodology

To estimate the Project operational noise impacts, reference noise level measurements were collected from active industrial and warehousing facilities in southern California with similar operational characteristics as expected for the Project. While sound pressure levels (e.g., L_{eq}) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (Lw) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish because of intervening obstacles and barriers, air absorption, wind, and other factors. Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The reference Project operational noise and sound power levels are summarized in Table 4.10-5*, Reference Stationary Noise Levels*.

Source(s): Urban Crossroads (05-31-2022)

Figure 4.10-2

Not to Scale

Noise Receiver Locations

Table 4.10-5 Reference Stationary Noise Levels

Noise Source[1]	Noise Source Height (Feet)	Min./Hour[2]		Reference Noise Level @ 50 feet (dBA L_{eq})	Sound Power Level (dBA)[3]
		Day	Night		
Loading Dock Activity	8'	60	60	65.7	111.5
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Parking Lot Vehicle Movements	5'	60	60	56.1	79.0
Trash Enclosure Activity	5'	10	10	57.3	89.0
Truck Movements	8'	60	60	58.0	93.2

[1] As measured by Urban Crossroads, Inc.
[2] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project Site. "Day" = 7:00 a.m. to 10:00 p.m.; "Night" = 10:00 p.m. to 7:00 a.m.
[3] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.
Source: (Urban Crossroads, 2022e, Table 9-1)

To fully describe the exterior operational noise levels from the Project, Urban Crossroads developed a noise prediction model using the CadnaA computer program. CadnaA can analyze multiple types of noise sources, including a the spatially accurate development site plan, georeferenced aerial imagery, topography, and three-dimensional buildings and barriers, in its calculations to predict outdoor noise levels. Noise levels were calculated at the receiver locations shown in Figure 4.9-2. Refer to Subsections 7.2 and 7.3 from the Project's Noise Analysis (see *Technical Appendix N*) for a detailed discussion of the derivation of assumed operational noise levels.

C. Vibration Analysis Methodology

Vibration levels were predicted using reference vibration levels and logarithmic equations contained in the FTA *Noise and Vibration Impact Assessment* manual. The vibration source levels for Project construction equipment are summarized in Table 4.10-6, *Vibration Source Levels for Construction Equipment*.

Table 4.10-6 Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec)at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual
Source: (Urban Crossroads, 2022e, Table 8-5)

4.10.5 IMPACT ANALYSIS

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

The analysis presented on the following pages summarizes potential construction noise levels and operational noise levels from Project-related activities. The detailed noise calculations for the analysis presented here are provided in Appendices 7.1 through 8.2 of the Project's Noise Analysis (see *Technical Appendix N*).

A. Construction Noise Impact Analysis

Construction activities on the Project Site would proceed in five (5) stages: 1) site preparation; 2) grading; 3) building construction; 4) paving; and 5) application of architectural coatings. Project construction activities would occur primarily during daytime hours (i.e., between 7:00 a.m. to 7:00 p.m. on Mondays through Saturdays) but there is the potential that some or all of the concrete pouring required for the building's foundation and/or wall panels could occur during nighttime hours (and should authorization for nighttime work be granted by San Bernardino County). These activities would create temporary periods of noise when pieces of heavy construction equipment are in operation and would cause a short-term increase in ambient noise levels. Project construction noise levels at nearby sensitive receiver locations are summarized in Table 4.10-7, *Construction Equipment Noise Level Summary*, and Table 4.10-8, *Nighttime Concrete Pouring Noise Level Summary*, respectively.

Table 4.10-7 Daytime Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	39.9	42.9	40.9	42.9	36.9	42.9
R2	43.5	46.5	44.5	46.5	40.5	46.5
R3	45.5	48.5	46.5	48.5	42.5	48.5

[1] Noise receiver locations are shown on Figure 4.10-2.
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project Site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 8.1 of the Project's Noise Analysis (see *Technical Appendix N*).
Source: (Urban Crossroads, 2022e, Table 8-2)

Table 4.10-8 Nighttime Concrete Pouring Noise Level Summary

Receiver Location[1]	Use	Construction Noise Levels (dBA L_{eq})		
		Paving Construction[2]	Nighttime Threshold[3]	Threshold Exceeded?
R1	School	19.6	45	No
R2	Hotel	22.9	45	No
R3	School	25.0	45	No

[1] Noise receiver locations are shown on Figure 4.10-2.
[2] Paving construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.
[3] Exterior noise level standards based on San Bernardino County Development Code Section 83.01.080(c).
Source: (Urban Crossroads, 2022e, Table 8-4)

As shown in Table 4.10-7 and Table 4.10-8, Project-related daytime construction activities and potential nighttime construction activities would not exceed the applicable significance thresholds and, therefore, the Project would not result in the generation of substantial temporary noise levels in excess of applicable local standards. Temporary impacts from construction noise would be less than significant.

B. Operational Noise Impact Analysis

Noise sources associated with long-term Project operation are expected to include idling trucks, delivery truck and automobile parking, delivery truck backup alarms, roof-top air conditioning units, loading and unloading of delivery trailers, and parking lot vehicle movements. The daytime and nighttime stationary noise levels from Project operations, as heard from nearby sensitive receptor locations, are summarized on Table 4.10-9 and Table 4.10-10, respectively.

Table 4.10-9 Daytime Project Operational Noise Level Summary

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA L_{eq})		
	R1	R2	R3
Loading Dock Activity	32.1	35.5	37.5
Roof-Top Air Conditioning Units	10.7	14.9	16.9
Trash Enclosure Activity	2.4	0.0	0.0
Parking Lot Vehicle Movements	20.3	23.6	25.7
Truck Movements	7.9	0.0	4.4
Total (All Noise Sources)	**32.4**	**35.8**	**37.8**

[1]Refer to Exhibit 7-A from the Project's Noise Analysis (*Technical Appendix N*) for noise source locations.
CadnaA noise model calculations are included in Appendix 7.1 of the Project's Noise Analysis.
Source: (Urban Crossroads, 2022e, Table 7-2)

Table 4.10-10Nighttime Project Operational Noise Level Summary

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA L_{eq})		
	R1	R2	R3
Loading Dock Activity	32.1	35.5	37.5
Roof-Top Air Conditioning Units	8.3	12.5	14.5
Trash Enclosure Activity	1.4	0.0	0.0
Parking Lot Vehicle Movements	20.3	23.6	25.7
Truck Movements	7.9	0.0	4.4
Total (All Noise Sources)	**32.4**	**35.8**	**37.8**

[1]Refer to Exhibit 7-A from the Project's Noise Analysis (*Technical Appendix N*) for noise source locations.
CadnaA noise model calculations are included in Appendix 7.1 of the Project's Noise Analysis.
Source: (Urban Crossroads, 2022e, Table 7-3)

Table 4.10-9 and Table 4.10-10 demonstrate that Project operations will satisfy the County's 55 dBA L_{eq} daytime and 45 dBA L_{eq} nighttime exterior noise level standards at the nearest receiver locations. Additionally, Project operations would result in a 0.0 dBA L_{eq} increase to the daytime and nighttime ambient noise

environments at nearby sensitive receptors, which would not exceed the applicable significance thresholds and, thus, would not be considered a substantial permanent increase to the existing noise environment (Urban Crossroads, 2022e, p. 35). Permanent noise impacts from Project operation would be less than significant.

Threshold b: ***Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?***

A. Construction Analysis

Construction activities on the Project Site would utilize equipment that has the potential to generate vibration. Vibration levels at sensitive receptors near the Project Site during Project construction are summarized on Table 4.10-11, *Construction Equipment Vibration Summary*. As shown, none of the receiver locations in the vicinity of the Project Site would be exposed to vibration levels that exceed the applicable significance threshold. Accordingly, Project construction would not generate excessive or substantial temporary groundborne vibration or noise levels and a less than significant impact would occur.

Table 4.10-11 Construction Equipment Vibration Summary

Receiver[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)	Thresholds Exceeded?
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	5,254'	0.000	0.000	0.000	0.000	0.000	0.2	No
R2	4,049'	0.000	0.000	0.000	0.000	0.000	0.2	No
R3	3,396'	0.000	0.000	0.000	0.000	0.000	0.2	No

[1] Receiver locations are shown on Figure 4.10-2
[2] Distance from receiver location to Project construction boundary.
[3] Based on the Vibration Source Levels of Construction Equipment (Table 4.10-6).
Source: (Urban Crossroads, 2022e, Table 8-6)

B. Operational Analysis

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible groundborne vibration beyond the Project Site. Trucks would travel to and from the Project Site along local roadways; however, vibration levels for heavy trucks operating at the posted speed limits on paved surfaces are not perceptible beyond the roadway. The Project would not result in the exposure of persons to excessive groundborne vibration or noise levels during long-term operation and a less than significant impact would occur.

Threshold c: ***For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

The Project Site is located approximately 0.60-mile southeast of the San Bernardino International Airport. The Project Site is not located within a noise safety compatibility zone for the San Bernardino International Airport

(San Bernardino County, 2019, p. 5.8-27). Accordingly, the Project would not expose people working on the Project Site to excessive noise levels from airport operations. Impacts would be less than significant.

4.10.6 Cumulative Impact Analysis

A. Construction Noise

Although there are several development projects under construction within the East Valley Area Plan, as noted in Section 4.0, *Environmental Analysis* of this EIR, none of the construction projects are expected to overlap with Project construction activities because the other projects are substantially "ahead" of the proposed Project, having already received discretionary approval and with construction permits issued whereas the Project still needs to complete the County's discretionary review process before being considered for approval by the County's decision-makers (and, if approved, would still require the County's review and issuance of construction permits). Further, even if construction activities were to overlap with Project construction activities, the other construction projects in the East Valley Area Plan are not close enough to the Project Site to make a considerable contribution to the existing noise environment at receptor locations, as noise diminishes rapidly over distance. Accordingly, there is no potential for the Project to contribute to the exposure of nearby sensitive receptors to substantial temporary (construction-related) increases in daytime or nighttime ambient noise levels.

B. Operational Noise

The analysis presented for Threshold "a" addresses the Project's contribution of noise to existing cumulative noise sources (i.e., ambient noise) in the Project area. Furthermore, development projects within the East Valley Area Plan that are under construction and not yet operational (and, therefore, not captured in the ambient noise measurements that were collected for the Project's analysis and addressed under Threshold "a") would not have the potential to combine with the Project to result in a cumulatively considerable impact at nearby sensitive receptors because: 1) The Project would result in no change – 0.0 dBA L_{eq} – to the existing environment at sensitive receptor locations; and 2) The locations of the other development projects are not close enough to the Project Site to make a considerable contribution to the existing noise environment at receptor locations, as noise diminishes rapidly over distance. The Project's permanent noise impacts would not be cumulatively considerable.

C. Groundborne Vibration and Noise

During construction, the Project's peak vibration impacts would occur during the grading phase when large pieces of equipment, like bulldozers, are operating on-site. (During the non-grading phases of Project construction, when smaller pieces of equipment are used on-site, the Project's vibration would be minimal.) Vibration effects diminish rapidly from the source; therefore, the only reasonable sources of cumulative vibration in the vicinity of the Project Site could occur on properties abutting these sites. As described above, there are no known active or pending construction projects abutting the Project Site that would overlap with the Project's proposed construction schedule. Accordingly, there is no potential for the Project to contribute to the exposure of persons to substantial temporary groundborne vibration or noise.

Under long-term conditions, the Project would not include or require equipment or activities that would result in perceptible groundborne vibration beyond the Project Site. Trucks would travel to and from the Project Site along local roadways; however, vibration levels for heavy trucks operating at the posted speed limits on paved surfaces are not perceptible beyond the roadway. The Project would not cumulatively contribute to the exposure of persons to excessive groundborne vibration or noise levels during long-term operation.

D. Airport Noise

The Project would not involve the construction, operation, or use of any public airports or public use airports. There are no conditions associated with implementation of the Project that would contribute airport noise or exposure of additional people to unacceptable levels of airport noise. Accordingly, the Project would have no potential to cumulatively contribute to impacts associated with noise from a public airport, public use airport, or private airstrip. Additionally, the Project Site and the immediately surrounding area are not subject to substantial airport- or air traffic-related noise under existing conditions and are not expected to be exposed to excessive future noise levels upon buildout of the Eastgate Air Cargo Facility at the San Bernardino International Airport (Urban Crossroads, 2022e, pp. 17-18). Accordingly, there is no potential for cumulative development to expose persons residing or working in the Project area to excessive airport-related noise levels.

4.10.7 Significance of Impacts Before Mitigation

Threshold "a:" Less than Significant Impact. The Project would generate short-term construction and long-term operational noise but would not generate noise levels that exceed the standards established by standards established by San Bernardino County.

Threshold "b:" Less than Significant Impact. The Project's construction and operational activities would not result in a perceptible groundborne vibration or noise.

Threshold "c:" Less than Significant Impact. The proposed Project would be compatible with noise levels from the San Bernardino International Airport and operation of the Project would not expose future employees on the Project Site to excessive noise levels.

4.10.8 Mitigation

Project impacts would be less than significant and mitigation is not required.

4.11 TRANSPORTATION

This Subsection incorporates information from two reports prepared by Urban Crossroads. The first report, a vehicle miles traveled analysis (VMT Analysis), is titled "Nevada Street Warehouse Vehicle Miles Traveled Screening Evaluation," dated August 15, 2022, and is included as *Technical Appendix O* to this EIR (Urban Crossroads, 2022f). The second report, a trip generation analysis, is titled "Nevada Street Warehouse (PROJ-2022-00012) Scoping Agreement," dated August 16, 2022, and is included as *Technical Appendix P* to this EIR (Urban Crossroads, 2022g). All references used in this Subsection are listed in EIR Section 7.0, *References*.

This Subsection assesses transportation impacts that would result from implementation of the Project. In accordance with Senate Bill (SB) 743, the California Natural Resources Agency (CNRA) adopted changes to the CEQA Guidelines in December 2018 that require, starting on July 1, 2020, the use of vehicle miles traveled (VMT) as the metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California are required to use VMT to evaluate project-related transportation impacts.

4.11.1 EXISTING CONDITIONS

A. Existing Project Site Traffic

The Project Site is vacant and undeveloped under existing conditions and does not generate traffic, with the exception of periodic trips associated with maintenance and weed abatement activities on the Project Site.

B. Existing Roadway System

The Project Site abuts Nevada Street on the west and is located approximately 650 feet north of Palmetto Avenue.

Along the Project Site frontage, Nevada Street is a paved street with no painted lane lines or lane markers and no painted shoulders or bike lanes; curb and gutter is provided on both sides of the street. There are no sidewalks along Nevada Street along the Project Site frontage, although there is a sidewalk on the east side of Nevada Steet immediately south of the Project Site. Nevada Street is classified as a two-lane "Collector Street." Collector Streets are considered minor roads that are not part of the Countywide Plan Roadway Network, but their purpose is to connect local areas to arterials and major roads within the Roadway Network. Existing traffic on Nevada Street consists of both passenger vehicles and trucks passing and accessing nearby land uses.

Palmetto Avenue is a paved, two-lane street with painted lane lines and no painted shoulders or bike lanes. West of Nevada Street, Palmetto Avenue features curb and gutter, landscaped park strips, and sidewalks on both sides of the street. East of Nevada Street, Palmetto Avenue features curb and gutter, a landscaped park strip, and sidewalks on the north side of the street. Palmetto Avenue is classified as a "Major Highway" in the vicinity of the Project Site (between California Street and Alabama Street) in the Countywide Plan Roadway Network. Existing traffic on Palmetto Avenue consists of both passenger vehicles and trucks passing through the area and accessing nearby land uses.

C. Existing Truck Routes

San Bernardino County has not established truck routes for unincorporated areas. In the vicinity of the Project Site, the City of Redlands has designated Alabama Street, California Street (south of San Bernardino Avenue), Nevada Street (south of Lugonia Avenue), San Bernardino Avenue (west of California Street and east of Alabama Street), and Lugonia Avenue as truck routes (Redlands, 2017, p. 5-30). In addition, the City of Redlands designates I-10 and SR-210 as truck routes; I-10 also is a Surface Transportation Assistance Act (STAA)-designated truck route (Redlands, 2017, p. 5-30; San Bern. Co., 2019, p. 5.16-26).

D. Existing Transit Service

Public transit service in the region is provided by Omnitrans, a public transit agency that serves various jurisdictions within San Bernardino County. There is no public transit service in the immediate vicinity of the Project Site and no known plans to extend transit service in the Project area. The nearest transit stop to the Project Site is located at the intersection of San Bernardino Avenue and Alabama Street, approximately 0.75-mile southeast of the Project Site, and provides service for Bus Route 15. (San Bern. Co., 2020, Policy Map TM-2; Google Earth, 2022)

E. Existing Bicycle and Pedestrian Facilities

There are no existing bicycle facilities in the Project area; however, Nevada Street and Palmetto Avenue are planned connections to a future trail along the Santa Ana River (San Bern. Co., 2020, Policy Map TM-4). There are no sidewalks along Nevada Street abutting the Project Site, although there is a sidewalk on the east side of Nevada Steet immediately south of the Project Site. There are existing sidewalks along Palmetto Avenue; west of Nevada Street sidewalks are located on both sides of the street while east of Nevada Street sidewalks are only located on the north side of the street.

4.11.2 Regulatory Setting

A. State Plans, Policies, and Regulations

1. 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 Public Resources Code Section 21099, the criteria for determining the 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 OPR proposed, and the CNRA certified and adopted changes to the CEQA Guidelines in December 2018, which entailed changes to the thresholds of significance for the evaluation of impacts to transportation. The updated CEQA Guidelines include the addition of CEQA Guidelines Section 15064.3, of which subsection "b" establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric.

B. Local Plans, Policies, and Regulations

1. SCAG Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG's Regional Council approved and adopted the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* ("*Connect SoCal*"). *Connect SoCal* is the applicable Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the Project. The goals of *Connect SoCal* are to: 1) Encourage regional economic prosperity and global competitiveness; 2) Improve mobility, accessibility, reliability, and travel safety for people and goods; 3) Enhance the preservation, security, and resilience of the regional transportation system; 4) Increase person and goods movement and travel choices within the transportation system; 5) Reduce greenhouse gas emissions and improve air quality; 6) Support healthy and equitable communities; 7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; 8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; 9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and 10) Promote conservation of natural and agricultural lands and restoration of habitats. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP/SCS.

2. San Bernardino County Congestion Management Program

The *San Bernardino County Congestion Management Program (CMP)* was prepared by the San Bernardino Associated Governments (since re-named as the San Bernardino County Transportation Authority, SBCTA). The intent of the *CMP* is to create a link between land use, transportation, and air quality planning decisions and to prompt reasonable growth management programs that would more effectively utilize new and existing transportation funds to alleviate traffic congestion and related impacts and improve air quality. The *San Bernardino CMP* was first adopted in November 1992 and has since been updated 12 times, with the most recent comprehensive update in June 2016. None of the roadways in the immediate vicinity of the Project Site are part of the *San Bernardino CMP* arterial roadway network; the nearest *CMP* arterial roadway to the Project Site is San Bernardino Avenue, located approximately 0.6-mile south of the Site (SBCTA, 2016, p. 2-5).

3. San Bernardino Countywide Plan

The Countywide Plan contains a Transportation & Mobility Element that is intended to guide the development of the circulation system within the County's unincorporated area in a manner that is compatible with the Countywide Plan's land use vision. The Transportation & Mobility Element provides policy direction to create a system of "complete streets," which refers to a multi-modal transportation network designed and operated to meet the needs of all users. Through the goals and policies of the Transportation & Mobility Element, the County will strive to meet diverse mobility needs and reduce vehicle miles traveled, which will reduce air pollution, greenhouse gas emissions, and roadway congestion. The Transportation & Mobility Element goals and policies applicable to the Project are addressed later in this chapter (see analysis under Subsection 4.11.5, response to Threshold "a").

4. San Bernardino County Measure "I"

Measure "I," a one-half of one percent sales tax on retail transactions, was approved by San Bernardino County voters in 1989 and extended by County voters in 2004 to remain effective through the year 2040. Funds raised through Measure "I" have funded in the past and will continue to fund new transportation facilities in San Bernardino County. The revenue generated by Measure "I" is to be used to fund transportation projects including, but not limited to, roadway improvements, commuter rail, public transit, and other identified improvements. Measure "I" also required that a local traffic impact fee be created to ensure that development projects are paying a fair share for transportation projects from which they would benefit (see discussion of "San Bernardino County Regional Transportation Development Mitigation Plan," below). Revenues collected through local traffic impact fee programs are used in tandem with Measure "I" revenues to fund projects identified in the SANBAG Development Mitigation Nexus Study, which is included as Appendix G to the *San Bernardino County CMP*.

5. San Bernardino County Regional Transportation Development Mitigation Plan

The County created its *Regional Transportation Development Mitigation Plan* program to impose and collect fees from new residential, commercial, and industrial development for the purpose of funding local transportation improvements necessary to accommodate expected local growth, as identified in the Countywide Plan. The collected fees are used to fund regional circulation network improvements (in conjunction with Measure "I" fees) as well as local facilities in the unincorporated area.

4.11.3 Basis for Determining Significance

The thresholds listed below are from CEQA Guidelines Appendix G and address the typical, adverse transportation-related effects that could result from development projects. The proposed Project would result in a significant transportation impact if the Project or any Project-related component would:

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

b. *Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

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

d. *Result in inadequate emergency access?*

4.11.4 Methodology for Evaluating Transportation Impacts

This Subsection assesses transportation impacts that would result from implementation of the Project. In accordance with Senate Bill (SB) 743, the California Natural Resources Agency (CNRA) adopted changes to the CEQA Guidelines in December 2018 that require, starting on July 1, 2020, the use of vehicle miles traveled (VMT) as the metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California are required to use VMT to evaluate project-related transportation impacts.

The Project's VMT Analysis was prepared in accordance with San Bernardino County's *Transportation Impact Study Guidelines* (July 9, 2019) and relies on the analysis methodologies that are generally summarized below. Refer to the Project's VMT Analysis (*Technical Appendix O*) for detailed description of the methodology used for calculating VMT and evaluating potential VMT impacts.

The Project's VMT analysis relies on the San Bernardino Transportation Analysis Model (SBTAM) to extract baseline VMT values for unincorporated areas in San Bernardino County and calculate VMT resulting from operation of the Project. The VMT model runs for the Project account for the Project's proposed land use and estimated service population (i.e., number of employees). Project-generated VMT includes all passenger vehicle trips that are traced to the Project's general geographic area (transportation analysis zone, TAZ). The Project's VMT is converted to an efficiency metric by dividing the VMT generated by the Project's employees (service population) to allow a comparison with the average VMT for employment generating land uses within unincorporated San Bernardino County.

Pursuant to the County's *Transportation Impact Study Guidelines*, a development project would result in a significant direct VMT impact if the project would result in VMT that is not at least four (4) percent below the baseline VMT for unincorporated areas in San Bernardino County, as evaluated on the basis of VMT per service population. According to SBCTA and the SBTAM, the baseline VMT per service population for unincorporated areas in San Bernardino County is 19.97 (Urban Crossroads, 2022f, p. 4). Accordingly, the significance threshold for a direct VMT impact is established for this EIR as 18.17 (19.91 x 0.96 = 19.17).

Additionally, pursuant to the County's *Transportation Impact Study Guidelines*, a development project would result in a cumulatively considerable VMT impact if the project were inconsistent with the adopted RTP/SCS for the project area. The adopted RTP/SCS for unincorporated San Bernardino County is *Connect SoCal*; thus, a cumulatively considerable VMT impact would occur if the Project were found to be inconsistent with the growth and development assumptions utilized for *Connect SoCal*.

4.11.5 Impact Analysis

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

This response provides an analysis of the Project's potential to result in a conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A project that generally conforms with, and does not obstruct, applicable plans, programs, ordinances, and policies is considered to be consistent. The transportation plans, policies, programs, ordinances, and standards that are relevant to the Project are identified in the analysis below.

❑ Connect SoCal

The fundamental goals of SCAG's *Connect SoCal* are to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. As indicated below, implementation of the Project would not conflict with the goals and policies of SCAG's regional planning program that are

applicable to the Project and related to vehicular and non-vehicular circulation. Accordingly, the Project would not conflict with the goals of *Connect SoCal* and Project impacts would be less than significant.

Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.

No component of the Project would alter, modify, or obstruct local transportation facilities in a manner that would adversely affect the mobility, accessibility, or reliability of the local transportation network. As discussed later in this Subsection (see response to Threshold "c"), the Project would not result in a substantial safety hazard to motorists. Additionally, the proposed building – as an indoor storage facility in close proximity to State highway facilities – would facilitate the mobility and reliability of the movement of goods throughout the region. The Project would not conflict with this *Connect SoCal* goal.

Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.

The Project would not conflict with the County's transportation network. The Project contributes to and would be consistent with planned land use and growth assumptions in unincorporated San Bernardino County, as anticipated by the Countywide Plan (and the County's preceding General Plan) and the East Valley Area Plan. The Project Applicant would pay applicable development impact fees that would fund additional local traffic improvements and maintenance of roadway infrastructure in the Project area. The Project would not conflict with this *Connect SoCal* goal.

Goal 4: Increase person and goods movement and travel choices within the transportation system.

The Project involves development of an industrial building within an industrial area on a property that is adjacent to multiple truck routes identified by the County and the City of Redlands and, also, in close proximity to facilities that are part of the State highway system (i.e., I-10 and SR-210), which would facilitate goods movement locally and within the region. The Project provides for the construction of new sidewalks along the east side of Nevada Street along its frontage with the Project Site. Also, the Project includes bicycle parking facilities and no component of the Project would obstruct or prevent the use of Nevada Street or Palmetto Avenue as planned walking or bicycle connections to the potential future trail along the Santa Ana River. Accordingly, the Project would ensure that multiple travel choices are available for future employees. The Project would not conflict with this *Connect SoCal* goal.

❑ San Bernardino Congestion Management Program

The Project is calculated to generate a maximum of 46 trips during the morning peak hour and 57 trips during the evening peak hour (Urban Crossroads, 2022f, p. 4). There are no *CMP* arterial roadways adjacent to the Project Site and the Project would neither generate 250 or more peak hour trips nor 50 or more peak hour trips added to any intersection or roadway in the vicinity of the Project Site, including State highway facilities (Urban Crossroads, 2022g, pp. 4-5). As such, the Project would not be considered a major traffic generator pursuant to the *San Bernardino County CMP*'s traffic impact analysis guidelines and is not expected to substantially affect the performance of the *CMP* circulation network. The *CMP*'s land use and travel demand management goals and policies are directed to local and regional public agencies and none would be directly applicable to the Project. Notwithstanding, the Project does not include any component that would prevent or obstruct the County or any other public agency from implementing the *CMP*'s goals and policies. Accordingly,

the Project would not result in a conflict with the *San Bernardino County CMP* and impacts would be less than significant.

❑ Countywide Plan

Within the Transportation & Mobility Element, the Countywide Plan establishes several goals and policies related to transportation network that are applicable to development projects. The following analysis provides a discussion of the Project's consistency with these applicable goals and policies. As indicated in the analysis below and on the following pages, the Project would not conflict with or obstruct the implementation of any applicable goal or policy from the Countywide Plan addressing the transportation network. As such, the Project would result in a less than significant impact.

Transportation & Mobility Element

Goal TM-1: Roadway Capacity. Unincorporated areas served by roads with capacity that is adequate for residents, businesses, tourists, and emergency services.

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

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

Analysis: As previously noted, the CEQA Guidelines require that potential transportation-related impacts to the environment be determined based on VMT; determining the significance of environmental impacts based on a LOS metric is prohibited. Therefore, the analysis provided here focuses solely on consistency with Countywide Plan Policy TM-1.1 from a transportation planning perspective and, in the event an inconsistency with this policy is found, such inconsistency is presented for information disclosure but is not considered an environmental impact pursuant to CEQA Guidelines Section 15064.3(a).

Pursuant to the County's policy, as documented in their *Transportation Impact Study Guidelines* (July 2019), the County utilizes an accepted screening threshold in the transportation engineering industry (i.e., 100 two-way peak hour trips, both actual and PCE trips) to determine whether a development project has the potential to substantially affect the performance of an intersection or roadway segment. When a development project would generate more than 100 peak hour trips, the County considers that project to be a contributor of substantial traffic to the local roads and requires additional analysis to determine whether the traffic generated by that development project would conflict with County plans, ordinances, and/or policies related to the circulation system. However, where there are no unique circumstances that suggest unacceptable traffic conditions – such as an existing safety problem or substandard operations at nearby intersection or street – and a development site is not located within 300 feet of an intersection of two Countywide Plan Roadway Network streets, then the County has determined that any development project that would create less than 100 peak hour trips would clearly have no adverse effect on the County's ability to achieve Policy TM-1.1 and, thus, would be consistent with this Policy.

The Project is calculated to generate a maximum of 46 trips during the morning peak hour and 57 trips during the evening peak hour (Urban Crossroads, 2022f, p. 4). When weighted for "passenger car equivalent" (PCE), which converts all classifications of vehicles – including heavy trucks with multiple axles – to a single metric, the Project is calculated to generate 58 trips during the morning peak hour and 69 trips during the evening peak hour (ibid.). The County has reviewed the Project's design proposal and reviewed traffic conditions in the surrounding area and determined that: 1) the Project would not introduce any design features that would create an unsafe or adverse traffic condition in the area; 2) there are no existing safety problems in the Project vicinity; 3) there are no substandard traffic facilities in the Project area; and 4) the Project Site is not located within 300 feet of an intersection of two Countywide Plan Roadway Network streets. In accordance with County policy, the traffic generated by the Project would not conflict with or obstruct the County from achieving the operations goals of Countywide Policy TM-1.1.

Policy TM-1.7: Fair share contributions. We require new development to pay its fair share contribution toward off-site transportation improvements.

Analysis: In accordance with the County's *Regional Transportation Development Mitigation Plan*, the Project Applicant would be required to pay fair-share fees that will be used by the County to fund the construction of local and regional circulation system improvements. The *Regional Transportation Development Mitigation Plan* establishes standard fees required for all development projects based on the location of the development site, the type of proposed land use, and the size of the development project. The County will condition the Project Applicant to pay the required fees prior to the issuance of a building permit. Based on the foregoing information, the Project would not conflict with Countywide Plan Policy TM-1.7.

Goal TM-2: Road Design Standards. Roads designed and built to standards in the unincorporated areas that reflect the rural, suburban, and urban context as well as the regional (valley, mountain, and desert) context.

Policy TM-2.2: Roadway improvements. We require roadway improvements that reinforce the character of the area, such as curbs and gutters, sidewalks, landscaping, street lighting, and pedestrian and bicycle facilities. We require fewer improvements in rural areas and more improvements in urbanized areas, consistent with the Development Code. Additional standards may be required in municipal spheres of influence.

Analysis: Nevada Street is the only public street that abuts the Project Site. The improvements to Nevada Street would be completed and dedicated to the County prior to the Project becoming operational and include widening the eastern half of the street, constructing new curb and gutter on the east side of the street, and constructing a landscaped park strip and sidewalk on the east side of the street. The improvements to Nevada Street would be constructed in accordance with County roadway design standards, would match the section (e.g., pavement width, lane striping) that occurs immediately south of the Project Site and, thus, would be in keeping with the existing character of the area. Based on the foregoing information, the Project would not conflict with Countywide Plan Policy TM-2.2.

Goal TM-3: Vehicle Miles Traveled. A pattern of development and transportation system that minimizes vehicle miles traveled.

Policy TM-3.1: VMT Reduction. We promote new development that will reduce household and employment VMT relative to existing conditions.

Analysis: Project-related traffic would generate VMT that is approximately 17 percent below the existing baseline for VMT in unincorporated areas of San Bernardino County; VMT for the Project's service population would be 16.16 whereas the existing VMT baseline for unincorporated areas of San Bernardino County is 19.97 (Urban Crossroads, 2022f, pp. 4, 6). Accordingly, the Project would reduce employment VMT within unincorporated San Bernardino County relative to existing conditions and, thus, would be consistent with Countywide Plan Policy TM-3.1.

Goal TM-4: Complete Streets, Transit, and Active Transportation. On- and off-street improvements that provide functional alternatives to private car usage and promote active transportation in mobility focus areas.

Policy TM-4.8: Local bicycle and pedestrian networks. We support local bike and pedestrian facilities that serve unincorporated areas, connect to facilities in adjacent incorporated areas, and connect to regional trails. We prioritize bicycle and pedestrian network improvements that provide safe and continuous pedestrian and bicycle access to mobility focus areas, schools, parks, and major transit stops.

Policy TM-4.11: Parking areas. We require publicly accessible parking areas to ensure that pedestrians and bicyclists can safely access the site and onsite businesses from the public right-of- way.

Analysis: The Project would provide a new sidewalk along the Project Site's frontage with Nevada Street. The proposed sidewalk would connect to an existing sidewalk that terminates south of the Project Site, thereby improving and promoting local opportunities for walking. The site plan for the Project meets pedestrian accessibility requirements and provides bicycle parking facilities for Project employees, thereby promoting local opportunities for bicycling. The Project would not conflict with Countywide Plan Policies TM-4.8 and TM-4.11.

Goal TM-5: Goods Movement. A road, rail, and air transportation system that supports the logistics industry and minimizes congestion in unincorporated areas.

Policy TM-5.6: Unincorporated truck routes. We may establish local truck routes in unincorporated areas to efficiently funnel truck traffic to freeways while minimizing impacts on residents. We establish routes where trucks are prohibited in unincorporated environmental justice focus areas and to avoid overlaps or conflicts with safe routes to schools.

Analysis: The County has not established truck routes for the unincorporated areas. The Project area is developed with industrial and public facility (i.e., wastewater treatment plant and landfill) land uses and heavy truck traffic is common on local roadways; thus, truck traffic generated by the Project would not be incompatible with existing, surrounding land uses and the type of traffic on local roadways. The Countywide Plan does not identify any environmental justice focus areas in the vicinity of the Project Site and heavy truck traffic from the Project would not pass adjacent to or through any environmental justice focus areas or residential communities along the expected path of travel between the Project Site and the State highway

system (San Bernardino County, 2020). Truck traffic from the Project is expected to pass by one school between the Project Site and the State Highway system (the Packinghouse Christian Academy); however, neither the SBCTA, County, nor City of Redlands have adopted a "Safe Routes to School" plan for this school and the lack of nearby residential areas, sidewalks or bike lanes make it unlikely that students walk or bike to this school. Based on the foregoing analysis, the Project would not conflict with Countywide Plan Policy TM-5.6.

Policy TM-5.7: Trucking-intensive businesses. We require trucking-intensive businesses to pay their fair share of costs to build and maintain adequate roads.

Analysis: In accordance with the County's *Regional Transportation Development Mitigation Plan*, the Project Applicant would be required to pay fair-share fees that will be used by the County to fund the construction of local and regional circulation system improvements. The *Regional Transportation Development Mitigation Plan* establishes standard fees required for all development projects based on the location of the development site, the type of proposed land use, and the size of the development project. The County will condition the Project Applicant to pay the required fees prior to the issuance of a building permit. Property tax revenue generated by the Project can be utilized by the County to fund ongoing maintenance of local roads. Based on the foregoing information, the Project would not conflict with Countywide Plan Policy TM-5.7.

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

The County's VMT analysis guidelines, as established in their *Transportation Impact Study Guidelines* (July 2019), are consistent with the requirements established by CEQA Guidelines Section 15064.3 to evaluate transportation impacts associated with a land use project. The County utilizes a "service population" as the metric to evaluate the significance of VMT generated by a development project. For non-residential projects, like the Project, the service population is considered to be the number of employees supported by the Project. Using employment generation factors from SCAG, the Project's transportation analysis assumed the Project would have 317 employees (Urban Crossroads, 2022f, p. 5). Based on data extracted from SBTAM, Project employees are calculated to generate 5,088 VMT per day, which corresponds to an average of 16.06 VMT for the Project's service population (ibid.). As noted earlier in this Subsection, the significance threshold for Project-related VMT is 19.17; thus, Project-related VMT would be approximately 16.2% below the significance threshold. Accordingly, the Project would not result in a conflict or inconsistency with CEQA Guidelines Section 15064.3. Impacts would be less than significant.

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

The types of traffic generated during operation of the Project (i.e., passenger cars and trucks) would be compatible with the type of traffic observed along adjacent roadways under existing conditions. All proposed improvements within the public right-of-way would be installed in conformance with County design standards. If any component of Project construction would occur in the public right-of-way and require the partial or full closure of a sidewalk and/or travel lane, all work would be required to adhere to the applicable construction

control practices that are specified in the *State of California Department of Transportation Construction Manual* and the *California Manual on Uniform Traffic Control Devices*, to minimize potential safety hazards. The County reviewed the Project's site plan, conceptual grading, and conceptual utility plan drawings to confirm that no hazardous transportation design features would be introduced within the County public right-of-way through implementation of the Project. Based on the foregoing information, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts would be less than significant.

***Threshold d:* Would the Project result in inadequate emergency access?**

The County reviewed the Project's site plan drawings and confirmed that the Project would provide adequate access to and from the Project Site and within the Project Site for emergency vehicle response. The types of traffic generated during operation of the Project (i.e., passenger cars and trucks) would be compatible with the type of traffic observed along surrounding roadways under existing conditions and Project traffic would not interfere with the circulation of emergency vehicles along public streets adjacent to the Project Site. All Project construction materials and equipment would be stored/staged on the Project Site and would not interfere with emergency vehicles traveling along Nevada Street. Any Project construction activities that would occur within the Nevada Street public right-of-way and requires a partial or full closure of a sidewalk or vehicle travel lane would require a traffic control plan that complies with the *California Manual on Uniform Traffic Control Devices* and that must be approved by County to ensure that emergency response is not adversely affected. Accordingly, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts would be less than significant.

4.11.6 Cumulative Impact Analysis

As described under the response to Threshold "a," the Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and, thus, would not cumulatively contribute to a conflict or obstruction with an applicable transportation-related program.

Pursuant to the County's *Transportation Impact Study Guidelines*, a development project would result in a cumulatively considerable VMT impact if the project were inconsistent with the adopted RTP/SCS for the project area. The adopted RTP/SCS for unincorporated San Bernardino County is *Connect SoCal.* The land development and growth assumptions utilized in *Connect SoCal* are based on land use information in local land use plans. The Project's proposed land use and development intensity are consistent with the Countywide Plan Land Use Map and, also, are consistent with the County General Plan that preceded the Countywide Plan (which was in effect when SCAG was compiling data for growth projections in the region). The Project also is consistent with the East Valley Area Plan. Because the Project would be consistent with local, applicable land use plans, the Project would be consistent with the land use development and growth assumptions, the Project would not be inconsistent with *Connect SoCal.* Accordingly, the Project would not result in a cumulatively considerable VMT impact.

The Project would not contribute to a significant cumulative impact under the topics discussed under Thresholds "c" and "d" because the Project would not cause or exacerbate existing transportation design safety concerns or adversely affect emergency access and there are no cumulative development projects adjacent to

the Project Site that could contribute additive effects that could degrade motor vehicle or pedestrian safety or emergency vehicle access in proximity to the Project Site.

4.11.7 Significance of Impacts Before Mitigation

Threshold a: Less than Significant Impact. The Project would not conflict with an applicable program, plan, ordinance or policy addressing the circulation system.

Threshold b: Less than Significant Impact. The VMT generated by the Project would not exceed the County VMT significance thresholds for direct or cumulative impacts.

Threshold c: Less than Significant Impact. The Project would not introduce any significant transportation safety hazards due to a design feature or incompatible use.

Threshold d: Less than Significant Impact. Adequate emergency access would be provided to the Project Site during construction and long-term operation. The Project would not result in inadequate emergency access to the Site or surrounding properties.

4.11.8 Mitigation

The Project would result in a less than significant transportation impact and no mitigation is required.

4.12 TRIBAL CULTURAL RESOURCES

The analysis in this Subsection relies on information from a cultural resources report titled "A Cultural Resources Study for the Nevada Street Project" (dated October 26, 2022). The report was prepared by BFSA and is included as *Technical Appendix E* to this EIR. The analysis in this Subsection also contains information obtained by the County during consultation with local Native American tribal representatives. All references used in this Subsection are listed in EIR Section 7.0, *References*.

Confidential information has been redacted from *Technical Appendix E* for purposes of public review. In addition, much of the written and oral communication between Native American tribes, the County, and BFSA is considered confidential in respect to places that may have traditional tribal cultural significance (California Government Code Section 65352.4), and although relied upon in part to inform the preparation of this EIR Subsection, those communications are treated as confidential and are not available for public review. Under existing State law, environmental documents must not include information about the location of archeological sites or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records Act (California Code Regulations Section 15120(d)).

4.12.1 EXISTING CONDITIONS

A. Regional Setting

Refer to Subsection 4.4, *Cultural Resources*, for a description of the pre/protohistoric period setting for the Inland Empire region and the Redlands area.

B. Project Site

The Project Site was vacant land prior to 1901 and from at least 1930 to 1975 was used as an orchard. By 1985, the Project Site was vacant and all trees had been removed. From at least 1989 until 2014, the Project Site was used for agriculture and planted with row crops. Agricultural production on the Project Site ceased in 2014. The northwest corner of the Project Site was used for the storage of dumpster trailers beginning between 2016-2018 and ending in 2021. (V3, 2021, p. 12; Google Earth, 2022) The Project Site is heavily disturbed and is routinely disked for fire fuel (weed) abatement.

BFSA surveyed the Project Site for the presence of prehistoric and protohistoric archaeological resources. Ground visibility on the Site was hindered only by dense, tall grasses; however, BFSA did not observe any prehistoric or protohistoric resources on the Project Site (BFSA, 2022a, p. 3.0-1).

BFSA also performed an archaeological records search through the South Central Coastal Information Center (SCCIC) at California State University (CSU), Fullerton. The records search provided information regarding previous archaeological studies in the Project area and any previously recorded sites within a one-half mile radius of the Project site. The results of this records search indicate that no prehistoric or protohistoric artifacts have been recorded on the Project Site or within a one-mile radius of the Site (BFSA, 2022a, p. 1.0-12).

4.12.2 Regulatory Setting

A. *Federal Regulations*

1. *Native American Graves Protection and Repatriation Act (NAGPRA)*

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation.

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s).

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archaeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items.

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorizes the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) requires the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; authorizes the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) directs the Secretary to develop regulations in consultation with this Review Committee.

B. State Regulations

1. California Administrative Code, Title 14, Section 4308

Section 4308, *Archaeological Features*, of Title 14 of the California Administrative Code provides that: "No person shall remove, injure, disfigure, deface, or destroy any object of archaeological, or historical interest or value."

2. California Code of Regulations Title 14, Section 1427

California Code of Regulations Title 14, Section 1427 provides that: "No person shall collect or remove any object or thing of archaeological or historical interest or value, nor shall any person injure, disfigure, deface or destroy the physical site, location or context in which the object or thing of archaeological or historical interest or value is found."

3. Assembly Bill 52 (AB 52)

California Assembly Bill 52 (AB 52) (2014) Chapter 532 amended Section 5097.94 of, and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved on September 25, 2014. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process.

The Public Resources Code (PRC) now establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (PRC, Section 21084.2.) To help determine whether a project may have such an effect, the PRC requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. (PRC, Section 21080.3.1.)

If a lead agency determines that a project may cause a substantial adverse change to tribal cultural resources, the lead agency must consider measures to mitigate that impact. PRC Section 20184.3 (b)(2) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

Section 21074 of the PRC defines "tribal cultural resources." In brief, in order to be considered a "tribal cultural resource," a resource must be either:

(1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or

(2) a resource that the lead agency chooses, in its discretion, to treat as a tribal cultural resource.

In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources. In applying those criteria, a lead agency must consider the value of the resource to the tribe.

4. State Health and Safety Code

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease "In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery…" until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from "internment or a place of storage while awaiting internment" with the intent to sell them or to dissect them with "malice or wantonness" is a public offense punishable by imprisonment in a state prison. Lastly, HSC Sections 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that "all California Indian human remains and cultural items are to be treated with dignity and respect." It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

California HSC, Section 5097.98 states that whenever the commission receives notification of a discovery of Native American human remains pursuant to HSC subdivision (c) of Section 7050.5, it shall immediately notify those persons that are the most likely descendants. The descendants may inspect the site and make recommendations to the landowner as to the treatment of the human remains. The landowner shall ensure that the immediate vicinity around the remains is not damaged or disturbed by further development activity until coordination has occurred with the descendants regarding their recommendations for treatment, taking into account the possibility of multiple human remains. The descendants shall complete their inspection and make recommendations within 48 hours of being granted access to the site.

5. California Code of Regulations Section 15064.5

The California Code of Regulations, Title 14, Chapter 3, Section 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archaeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in CEQA Guidelines Section 15064.5, as follows:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852) including the following:
    - Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    - Is associated with the lives of persons important in our past;
    - Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
    - Has yielded, or may be likely to yield, information important in prehistory or history.
- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

6. San Bernardino Countywide Plan

The Cultural Resources Element of the Countywide Plan sets forth goals and policies related to the protection of archaeological and tribal cultural resources. Goals and policies that may be applicable to the Project and/or Project Site are summarized below.

Goal CR-1: Tribal Cultural Resources. Tribal cultural resources that are preserved and celebrated out of respect for Native American beliefs and traditions.

Policy CR-1.1: Tribal notification and coordination. We notify and coordinate with tribal representatives in accordance with state and federal laws to strengthen our working relationship with area tribes, avoid inadvertent discoveries of Native American archaeological sites and burials, assist with the treatment and disposition of inadvertent discoveries, and explore options of avoidance of cultural resources early in the planning process.

Policy CR-1.3: Mitigation and avoidance. We consult with local tribes to establish appropriate project-specific mitigation measures and resource-specific treatment of potential cultural resources. We require project applicants to design projects to avoid known tribal cultural resources, whenever possible. If avoidance is not possible, we require appropriate mitigation to minimize project impacts on tribal cultural resources.

Policy CR-1.4: Resource monitoring. We encourage active participation by local tribes as monitors in surveys, testing, excavation, and grading phases of development projects with potential impacts on tribal resources.

Goal CR-2: Historic and Paleontological Resources. Historic resources (buildings, structures, or archaeological resources) and paleontological resources that are protected and preserved for their cultural importance to local communities as well as their research and educational potential.

Policy CR-2.3: Paleontological and archaeological resources. We strive to protect paleontological and archaeological resources from loss or destruction by requiring that new development include appropriate mitigation to preserve the quality and integrity of these resources. We require new development to avoid paleontological and archeological resources whenever possible. If avoidance is not possible, we require the salvage and preservation of paleontological and archeological resources.

4.12.3 Basis for Determining Significance

The thresholds listed below are derived directly from Appendix G to the CEQA Guidelines and address the typical, adverse effects related to cultural resources that could result from development projects. The Project would result in a significant impact to cultural resources if the Project or any Project-related component would:

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

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

   ii) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth is 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.

4.12.4 Methodology for Evaluating Tribal Cultural Resources Impacts

The analysis of potential impacts tribal cultural resources is based on a cultural resources records search through SCCIC at CSU Fullerton, historic background research, a review of historic aerial photographs, and a visit to the Project Site. In addition, this analysis is based on consultation between the County and interested Native American tribes pursuant to AB 52.

4.12.5 Impact Analysis

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

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

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

No pre/protohistoric resource sites, features, places, or landscapes were identified on the Project Site that are either listed or eligible for listing in the California Register of Historic Places (BFSA, 2022, p. 1.0-14, 3.0-1). To be eligible for the Register, a resource must include the following:

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

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

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC, Section 5024.1, Title 14 CCR, Section 4852)

No tribal cultural resources were identified on the Project Site that meet any of the four criteria listed above to be eligible for the California Register and no prehistoric resource sites or isolates are known to exist on the Project Site (ibid.). Furthermore, no substantial evidence was presented to or found by

the County during the tribal consultation process that led to the identification of any features or resources on the Project Site that in the County's discretion had the potential to be considered a tribal cultural resource.

As part of the AB 52 consultation process required by State law, the County sent notification of the Project to Native American tribes with possible traditional or cultural affiliation to the Project area. No Native American tribe requested consultation with the County or provided the County with substantial evidence indicating that tribal cultural resources, as defined in PRC Section 21074, are present on the Project Site or have been found previously on the Project Site. Notwithstanding, due to the Project Site's location in an area where Native American tribes are known to have a cultural affiliation, there is the possibility that pre/protohistoric archaeological resources, including tribal cultural resources, could be encountered during ground-disturbing construction activities – although this likelihood is considered low due to the pervasive, historic and on-going disturbances that have occurred on the Project Site. In the event a tribal cultural resource, as defined in PRC Section 21074, is found on the Project Site during construction – and not protected – a significant impact would occur. Mitigation is required.

As discussed under EIR Subsection 4.4, the Project Site does not contain a known cemetery site and human remains have not been previously discovered on the site. Mandatory compliance with State law (California HSC Section 7050.5 and PRC Section 5097.98) would ensure that, in the unlikely event that human remains are discovered during Project construction, the remains would be identified in accordance with proper protocols and the remains would be treated or disposed with appropriate dignity. Accordingly, the Project would not result in a substantial adverse effect to tribal cultural resources associated with human remains.

4.12.6 Cumulative Impact Analysis

Development activities on the Project Site would not impact any known tribal cultural resources and the likelihood of uncovering previously unknown prehistoric archaeological resources during Project construction are low due to the magnitude of disturbance that has occurred on the Site due to historic agriculture uses. Nonetheless, the potential exists for tribal cultural resources that meet the definition from PRC Section 21074 to be buried below the existing ground surface and discovered on the Project Site – and other development project sites in the region – during construction activities. Accordingly, the Project has the potential to contribute to a significant cumulative impact to tribal cultural resources. Therefore, the Project would potentially result in a cumulatively considerable impact to tribal cultural resources if such resources are unearthed during Project construction.

4.12.7 Significance of Impacts Before Mitigation

Threshold a: Significant Direct and Cumulatively Considerable Impact. The Project Site does not contain any recorded, significant tribal cultural resource sites; therefore, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources.

Nonetheless, Project construction activities have the potential to unearth and adversely impact tribal cultural resources that may be buried at the Project Site.

4.12.8 Mitigation

At the request of the Yuhaaviatam of San Manuel Nation, the following mitigation measures are required to ensure that the Project does not result in inadvertent, adverse effects to tribal cultural resources during construction.

MM 4.12-1 The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during Project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the Project Archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of ground disturbing construction activities for the Project (e.g., grading, excavation, trenching), should YSMN elect to place a monitor on-site.

MM 4.12-2 Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the Project.

4.12.9 Significance of Impacts After Mitigation

Threshold a: Less than Significant with Mitigation Incorporated. Implementation of MM 4.12-1 and MM 4.12-2 would ensure the proper identification and subsequent treatment of any significant tribal cultural resources that may be encountered during ground-disturbing activities associated with Project development. With implementation of the required mitigation, the Project's potential impact to significant tribal cultural resources would be reduced to less than significant.

5.0 Other CEQA Considerations

5.1 Significant Environmental Effects that Cannot be Avoided if the Project is Implemented

The CEQA Guidelines require that an EIR disclose the significant environmental effects of a proposed project that cannot be reduced to a level of insignificance if the project is implemented and, where impacts cannot be alleviated without imposing an alternative design, the reasons why the project is being proposed, notwithstanding its effect, should be described (CEQA Guidelines Section 15126(b) & Section 15126.2(c)). As described in detail in Section 4.0 of this EIR, after the consideration of Project design features, compliance with applicable federal, State and local regulations, and the application of the feasible mitigation measures identified in this EIR, the Project is not expected to result in any significant unavoidable environmental impacts.

5.2 Significant Irreversible Environmental Changes Which Would be Caused by the Project Should it be Implemented

The CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (CEQA Guidelines Section 15126.2(c)). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from any potential environmental accidents; or d) the proposed consumption of resources are not justified (e.g., the project results in the wasteful use of energy).

Determining whether the Project may result in significant irreversible environmental changes requires a determination of whether key non-renewable resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Natural resources, in the form of construction materials and energy resources would be used in the construction of the proposed Project. The consumption of these natural resources would represent an irreversible change to the environment. However, development of the Project Site would have no measurable adverse effect on the availability of such resources, including resources that may be non-renewable (e.g., construction aggregates, fossil fuels) and fossil fuels (that would be used to power the haul trucks bringing aggregates to the Project Site). Additionally, the Project is required by law to comply with the California Green Building Standards Code (CALGreen), which will minimize the Project's demand for energy, including energy produced from non-renewable sources. A more detailed discussion of Project energy consumption is provided in EIR Subsection 4.5, *Energy*.

Implementation of the Project would commit the Project Site to long-term use as a warehouse distribution facility. The land use proposed by the Project is consistent with the Project Site's existing Countywide Plan land use designation, East Valley Area Plan land use designation, and zoning classification, and the proposed use would be compatible with existing and planned industrial land uses within the Redlands "Donut Hole" area. In addition, the Project represents infill development, as the Project Site is surrounded on all sides by

existing warehouse distribution and public facility (i.e., wastewater treatment plant and landfill) land uses. Accordingly, the Project and its environmental effects would not compel or commit surrounding properties to land uses other than those that are existing today or those that are planned by the Countywide Plan, East Valley Area Plan, or the City of Redlands General Plan. For this reason, the Project would not result in a significant, irreversible change to nearby, off-site properties.

EIR Subsection 4.8, *Hazards and Hazardous Materials*, provides an analysis of the potential for hazardous materials to be transported to/from the Project Site and/or used on the Project Site during construction and operation. As disclosed in Subsection 4.8, mandatory compliance with federal, State, and local regulations related to hazardous materials handling, storage, and use by all Project construction contractors (near term) and occupants (long-term) would ensure that any hazardous materials used on-site would be safely and appropriately handled to preclude any irreversible damage to the environment that could result if hazardous materials were released from the site.

As discussed in detail under EIR Subsection 4.5, *Energy*, the Project would not result in a wasteful, inefficient, or unnecessary consumption of energy. Accordingly, the Project would not result in a significant, irreversible change to the environment related to energy use.

Based on the above, Project construction and operation would require the commitment of both renewable and non-renewable resources. However, this commitment of resources would not be substantial and would be consistent with regional and local growth forecasts and development goals for the area, and these resources would not be used in an inefficient or wasteful manner. Project construction and operation would adhere to the sustainability requirements of Title 24 (including but not limited to its "green" and energy efficiency requirements). Therefore, the Project would not result in the commitment of large quantities of natural resources that would result in significant irreversible environmental changes.

5.3 GROWTH-INDUCING IMPACTS OF THE PROJECT

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(d)). New employees and new residential populations represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environs where population growth results in increased demand for service and commodity markets responding to the new population of residents or employees.

According to regional population projections included in SCAG's *Connect SoCal*, the unincorporated San Bernardino County is projected to grow by 45,000 persons between 2016 and 2045 (an approximately 0.5% annual increase) while the City of Redlands, which completely surrounds the "Donut Hole" area, is projected

to grow by 11,300 persons (an approximately 0.5% annual increase). Between 2016 and 2045, unincorporated San Bernardino County is projected to add 14,100 new jobs (an approximately 0.8% annual increase) and the City of Redlands is projected to add 13,700 new jobs (an approximately 1.1% annual increase). (SCAG, 2020, *Demographics and Growth Forecast Technical Report*, Table 14) Incremental economic growth would take place as a result of the Project's operation as a warehouse distribution building. The Project's employees – both short-term construction and long-term operational – would likely purchase goods and services in the region. Any secondary increase in employment associated with meeting these goods and services demands is expected to be accommodated by existing service providers and retail establishments. Based on the amount of existing commercial and retail services available near the Project Site (specifically along Alabama Street, south of San Bernardino Avenue – approximately 0.75-mile southeast of the Project Site), the goods and services demand of the Project's employees are expected to be accommodated by existing, local development and would be highly unlikely to result in any new growth that could result in unanticipated, adverse physical impacts to the environment. In addition, the Project would create jobs, that would likely be filled by residents of the housing units either already built or planned for development within nearby incorporated and unincorporated areas, and it is not expected that any new housing units would need to be constructed to accommodate the Project's employees. Accordingly, because it is anticipated that most of the Project's future employees would already be living in the Inland Empire area, the Project's introduction of employment opportunities on the Project Site is not expected to induce substantial growth in the area.

Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in local and regional land use plans and population projections. Significant growth impacts also could occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth inducement by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

The Project represents an infill development Project within an area that the County has planned for employment-generating land uses. The Project would not extend roads or infrastructure to an area that is not already served by these facilities. Thus, the Project would not remove obstacles to growth or include improvements that that could induce growth. Furthermore, the Project Site is surrounded by warehouse distribution facilities on the east, south, and southwest, a municipal landfill on the west, and a municipal wastewater treatment facility on the north. As the last remaining piece of undeveloped property north of Palmetto Avenue, development of the Project Site would not place short-term development pressure on abutting properties because these areas are already developed. Furthermore, the Project area is already served by utilities and infrastructure, and there are no components of the Project or the Project's proposed infrastructure improvements that would remove obstacles for surrounding properties to develop.

Based on the foregoing analysis, the Project would not result in substantial, adverse growth-inducing impacts.

5.4 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING THE EIR PREPARATION PROCESS

CEQA Guidelines Section 15128 requires that an EIR *"...contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."* During the preparation of this EIR, the Project was determined to clearly have no potential to result in significant impacts under eight (8) environmental issue areas: aesthetics; land use and planning; mineral resources; population and housing; public services; recreation; utilities and service systems; and wildfire. Therefore, these issue areas were not required to be analyzed in detail in EIR Section 4.0, *Environmental Analysis*. A brief summary of the Project's impacts to aesthetics, agriculture/forestry resources, land use/planning, mineral resources, population and housing, public services, recreation, utilities/service systems, and wildfire is presented below and on the following pages. The thresholds of significance used to evaluate the Project's potential impacts under each issue area were taken from Appendix G to the CEQA Guidelines.

5.4.1 AESTHETICS

Threshold a:	***Would the Project have a substantial adverse effect on a scenic vista?***

The Countywide Plan does not designate specific scenic vistas throughout the County but, generally, considers prominent hillsides, ridgelines, dominant landforms and reservoirs to be scenic resources (San Bernardino County, 2020; Policy NR-4.1). The Project Site does not contain any scenic resources and does not serve as a scenic vista or contribute to a scenic vista; the Project Site is vacant and undeveloped and is covered with non-native, weedy vegetation. Scenic resources visible (at least partially) from public viewpoints adjacent to the Project Site include the San Bernardino Mountains, which are visible to the north and east from Nevada Street. The Project would not substantially change views of the San Bernardino Mountains from the segment of Nevada Street that abuts the Project Site because views are already partially obstructed by mature trees located north of the Site and by existing warehouse development located east of the Site. Based on the foregoing analysis, the Project would not have a substantial adverse effect on a scenic vista or scenic resources in the Project vicinity. No impact would occur.

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

The Project Site is not located within or adjacent to an officially designated State scenic highway corridor and does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings (Caltrans, 2022). Accordingly, the Project would result in no impact to scenic resources, including resources within a California scenic highway.

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

The United States Census Bureau defines "urbanized area" as a densely settled core of census tracts and/or census blocks that have 50,000 or more residents, and meet minimum population density requirements while also being adjacent to territory containing non-residential urban land uses. The Project Site is not located within the boundaries of the 2010 Census-defined "Riverside-San Bernardino urban area" (USCB, 2012); however, at the time the 2010 Census was prepared the Redlands "Donut Hole" area was mostly undeveloped, as was the surrounding area in the City of Redlands (east of Mountain View Avenue and west of California Street). Since 2010, almost all undeveloped parcels in the Redlands "Donut Hole" area and nearby areas in the City of Redlands have been developed with industrial, commercial, and multi-family residential land uses. Accordingly, for purposes of evaluation under this threshold, the Project area is considered to be "urbanized."

The Project's design, including site layout, architecture, and landscaping is discussed and illustrated in detail in EIR Section 3.0. As previously described, the Project's architecture incorporates a neutral color palette that would not be visually offensive and also incorporates accent elements, such as colored glass and decorative building elements for visual interest. Additionally, the Project's landscape plan incorporates low-water-need plant species that can maintain vibrancy during drought conditions. The proposed visual features of the Project would ensure a high-quality aesthetic for the site. The County reviewed the Project proposal in detail and determined that no component of the Project would conflict with applicable design regulations within the East Valley Area Plan or the County's Development Code that govern scenic quality. No impact would occur.

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

Under the existing conditions, the Project Site contains no sources of artificial lighting; but, artificial lighting (i.e., street lights) is present along Nevada Street immediately south of the Project Site. The Project Applicant proposes to develop the Project Site with a warehouse facility and would introduce additional lighting elements on-site to illuminate the parking areas, truck docking areas, and building entrances.

County Development Code Section 83.07.050 requires outdoor lighting for commercial or industrial land uses to be fully shielded to preclude light pollution or light trespass onto adjacent properties. The Development Code also specifies that exterior lighting associated with nonresidential uses shall not blink, flash, oscillate, or be of unusually high intensity or brightness. The Project would be required to demonstrate compliance with the aforementioned requirements prior to issuance of building permits. Project compliance with the lighting requirements within the County Development Code would ensure that the Project would not produce a new source of substantial light or glare from artificial lighting sources that would adversely affect day or nighttime views in the area.

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

Based on the foregoing analysis, the proposed Project would not create a new source of substantial light or glare and would not adversely affect daytime or nighttime views of the area.

5.4.2 Land Use and Planning

Threshold a:	***Would the Project physically divide an established community?***

Development of the Project would not physically disrupt or divide the arrangement of an established community. A chain link fencing forms the northern and southern boundaries of the Project Site, Nevada Street forms the western boundary of the Site and a solid concrete wall for an abutting warehouse distribution facility forms the eastern boundary of the Site. Due to the existing barriers that already separate the Project Site from abutting properties, implementation of the Project would not result in the physical disruption or division of an established community. Therefore, no impact would occur.

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

❑ **San Bernardino Countywide Plan**

The Project is consistent with the land use designations assigned to the Project Site by the Countywide Plan and the East Valley Area Plan. As demonstrated by the analysis provided throughout this EIR, the Project would not conflict with any applicable goal or policy from the Countywide Plan that was adopted for the purpose of avoiding or mitigating an environmental effect, including goals and policies from the Land Use, Housing, Infrastructure & Utilities, Transportation & Mobility, Natural Resources, Renewable Energy & Conservation, Cultural Resources, Hazards, Personal & Property Protection, Economic Development, and/or Health & Wellness elements.

❑ **Connect SoCal**

As shown in Table 5-1, *SCAG's Connect SoCal Goal Consistency Analysis*, the Project would not conflict with the adopted *Connect SoCal*. Thus, no impacts would occur.

Table 5-1 SCAG's Connect SoCal Goal Consistency Analysis

Goals	Goal Statement	Project Consistency Discussion
1	Encourage regional economic prosperity and global competitiveness.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. It should be noted that the Project would improve the regional economy by creating a new warehouse facility that is estimated to create new jobs that would create a new regional income source and would increase the local tax base.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	No conflict identified. The Project Applicant would improve the segment of Nevada Street that abuts the Project Site to its planned ultimate half-width, thereby improving local mobility. Additionally, there are no components of the Project that would foreseeably result in substantial safety hazards to motorists or pedestrians, as discussed in EIR Subsection 4.11, *Transportation*.
3	Enhance the preservation, security, and resilience of the regional transportation system.	No conflict identified. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. The Project would have no adverse effect on such planning or maintenance efforts. This policy provides guidance to the County to monitor the transportation network and to coordinate with other agencies as appropriate. The Project would not conflict with the County's transportation network or the County's coordination with other agencies.
4	Increase person and goods movement and travel choices within the transportation system.	No conflict identified. The Project involves development of a warehouse facility within a mostly developed industrial area and in close proximity to existing commercial services and the State highway system, which would minimize vehicle trips, vehicle miles traveled, and air pollution. The Project would construct frontage improvements, including sidewalks which would encourage walking in the Project area.
5	Reduce greenhouse gas emission and improve air quality.	No conflict identified. The Project incorporates various measures related to building design, landscaping, and energy systems to promote energy efficiency. The Project also would construct frontage improvements, including sidewalks which would encourage walking in the Project area.
6	Support healthy and equitable communities.	No conflict identified. The proposed building design would support the health of occupants and users by using non-toxic building materials and finishes, and by using windows to maximize natural light and ventilation.

Table 5-1 SCAG's Connect SoCal Goal Consistency Analysis

Goals	Goal Statement	Project Consistency Discussion
7	Adapt to a changing climate and support an integrated regional development.	No conflict identified. *Connect SoCal* indicates that there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. Warehouse distribution and e-commerce continues to be one of the most influential factors shaping goods movement. The Project involves the development of an underutilized property with a warehouse facility that would diversify the County's economy and bring employment opportunities closer to the local workforce. Co-locating jobs near commercial uses and housing reduces greenhouse gas emissions caused by long commutes and performing errands and contributes to integrated development patterns.
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No conflict identified. *Connect SoCal* also indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouse distribution facilities, such as the Project, are increasingly integrating automation to improve operational efficiencies in response to the surge in e-commerce. Additionally, continued developments and demonstrations of electric-powered and automated truck technologies will alter the goods movement environment with far-reaching effects ranging from employment to highway safety. The Project would meet contemporary industry standards to support advancements in these and other transportation technologies.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Not applicable. The Project is located in an area designated for employment-generating uses and is not planned for housing.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	Not conflict identified. The Project Site is completely disturbed and is not natural habitat or active agricultural land. Although the Project Site was formerly used for agriculture, the Project Site is not considered an important agricultural resource, as described in EIR Section 4.1, *Agriculture & Forestry Resources*.

Source: (SCAG, 2020a, p. 9)

❑ SCAQMD Air Quality Management Plan (AQMP)

The Project's consistency with the SCAQMD *2016 AQMP* was addressed in detail in EIR Subsection 4.2, *Air Quality*. As concluded in EIR Subsection 4.2, implementation of the Project would not result in NAAQS or CAAQS violations nor would it substantially contribute to an existing air quality violation or substantially

prevent the achievement of air quality goals from the *2016 AQMP*. The Project is consistent with the land use assumptions reflected in the Countywide Plan and East Valley Area Plan and would not result in growth (and associated air pollution) that was not anticipated by the *2016 AQMP*. As such, the Project would not conflict with the *AQMP*.

❑ San Bernardino County Congestion Management Program

The Project's consistency with the *San Bernardino County CMP* is addressed in EIR Subsection 4.11, *Transportation*. As concluded in EIR Subsection 4.11, the Project would not result in a substantial environmental impact due to a conflict with the *San Bernardino County CMP*.

5.4.3 Mineral Resources

Threshold a:	***Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***
Threshold b:	***Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

The California Department of Conservation classifies the Project Site within "Mineral Resource Zone 2 (MRZ-2)" (San Bernardino County, 2020, Policy Map NR-4). The MRZ-2 zone indicates "areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists." However, the mineral resource zone classifications assigned by the Department of Conservation focus solely on geologic factors and the potential value and marketability of a mineral resource, without regard to existing land use and ownership or compatibility with surrounding land uses. The Countywide Plan and East Valley Area Plan, which establish the County's plan for the highest and best use of the Project Site in consideration of the local land use context, designate the Project Site for industrial land uses. Furthermore, the East Valley Area Plan does not allow mining within its plan boundaries. This means that the County has determined that planned industrial land uses on the Project Site are more valuable to the region than potential mineral extraction uses. Additionally, due to constraints on the Project Site (for example, the relatively small size of the Site, which presents issues related to required equipment setbacks and staging areas, and utility easements that traverse the Site) mineral resources extraction would not be feasible on-site. In addition, neither the Countywide Plan nor the East Valley Area Plan identify any important mineral resource recovery sites on or in the proximity of the Project Site. Accordingly, the Project would not result in significant impact related to the loss of availability of a known mineral resource.

5.4.4 Population and Housing

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

The Project Applicant would develop the Project Site with employment land uses. The Project Site is located in an area of the County that is already developing with employment land uses and on a property that is planned for employment land uses by the Countywide Plan and East Valley Area Plan. Accordingly, development of

the Project would sustain the ongoing trend of the development of employment land uses in this part of the County and would generate job growth that is consistent with what was already anticipated by the County in the Countywide Plan and evaluated in the Countywide Plan EIR. Additionally, the Project Site is located in an area of the County that is served by existing roadways and public utility infrastructure and the Project would not require the extension or expansion of any infrastructure beyond what is needed to service the Project. Accordingly, implementation of the Project would not induce direct or indirect substantial unplanned growth in the area.

Threshold b:	***Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

The Project Site is vacant and undeveloped and does not contain housing. The Project would not displace substantial existing housing or people and would not necessitate the construction of replacement housing elsewhere.

5.4.5 Public Services

Threshold a.i:	***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?***

The construction and operation of the Project would increase the demand for fire protection by introducing more building area on the Project Site. Service demand in and of itself is not an environmental impact under CEQA unless such demand causes a physical change to the environment. The increase in building area on the Site is not anticipated to result in an increase in demand for fire protection services high enough to trigger the need to physically construct new fire protection facilities. Furthermore, the County forwarded the Project's application materials to the San Bernardino County Fire Protection District (County Fire) for review and comment. County Fire did not provide any comments to the County indicating that the Project would not be adequately served by fire protection services or that incremental increase in the demand for services would result in or require new or expanded fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

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

Although the Project would not result in the need for new or expanded fire protection facilities, as a standard condition of approval, the Project Applicant/Developer or Project Site owner would be required to pay impact fees for fire protection services in accordance with County Fire Fee Ordinance No. FPD-01, which requires a fee payment that the County applies to the funding of fire protection facilities. Mandatory compliance with Ordinance No. FPD-01 would be required prior to the issuance of a building permit. In addition, property tax revenues generated from development of the site would also provide funding to offset potential increases in the demand for fire protection at Project build-out.

Based on the foregoing, the Project would receive adequate fire protection service and would not result in the need for new or physically altered fire protection facilities.

Threshold a.ii: ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?***

Under existing conditions, the Project receives police protection services from the San Bernardino County Sheriff's Department. The Sheriff's Department would continue to provide police protection services to the Project site upon buildout of the Project. The Project Site, which formerly was used for agricultural production, historically has received police protection services for its employees. Although development of the Site with a new warehouse building would increase the number of employees and visitors on the Project Site above historic levels, the incremental increase in demand for police protection services is not anticipated to require or result in the construction of a new or physically altered police facility. Furthermore, property tax revenues generated from development of the Site would provide funding to offset potential increases in the demand for police services at Project build-out. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities.

Threshold a.iii: ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for school services?***

The Project Site is located within the Redlands Unified School District (RUSD) boundaries. 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 proposed Project is not expected to draw a substantial number of new residents to the region and would, therefore, not indirectly generate school-aged students requiring public education. Because the proposed Project would not directly generate students and is not expected to indirectly draw students to the area, the proposed Project would not cause or contribute to a need to construct new or physically altered public school facilities. Furthermore, the Project would be required to pay school impact fees to the RUSD pursuant to Government Code Section 65995-

6. Pursuant to Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities." Therefore, mandatory payment of school impact fees would ensure that the Project's potential impacts to school facilities and services would be less than significant levels.

Threshold a.iv:	***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for park services?***

The Project would allow for the operation of a warehouse distribution facility. The proposed use would not result in an increase in the County's residential population such that new or expanded recreational facilities would be needed. As such, Project impacts to park facilities and services would be less than significant.

Threshold a.v:	***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, need for new or physically altered other public facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public services?***

The proposed Project would allow for the operation of a warehouse distribution facility. Employment opportunities are expected to be mostly filled by the local labor pool. While the Project could result in a nominal increase in demand for library and health services, due to the limited nature of the proposed development, the Project would not result in or require new or expanded library or health care facilities. Therefore, Project impacts to library and health services would be less than significant.

5.4.6 Recreation

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

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.

Threshold 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?***

The Project does not propose to construct any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Therefore, environmental effects related to the construction or expansion of recreational facilities would not occur.

5.4.7 Utilities and Service Systems

Threshold a:	***Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?***

The Project would connect to existing water, sewer, and storm drain lines beneath Nevada Street. The Project also would connect to the existing electricity (including undergrounding existing overhead powerlines along the Project Site frontage with Nevada Street) and communications infrastructure that already exist in the area. All such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. Construction activities within the public street right of way have the potential to create intermittent and short-term inconvenience hazards for motorists and pedestrians; however, all utility construction work that occurs within a public street right of way must adhere to the construction control practices that reduce impacts that are specified in the *State of California Department of Transportation Construction Manual*, published by Caltrans (Caltrans, 2020). The construction of the proposed utility service connections has the potential to cause environmental effects associated with short-term air pollutant, noise emissions, and water quality effects that are an inherent part of the Project's construction process. The Project's construction air quality, noise emissions, and water quality effects have been disclosed in EIR Subsections 4.2, 4.7, 4.9, and 4.11 (the construction-level impacts disclosed in these Subsections are inclusive of the effects from the construction of utility infrastructure). Where significant construction-related impacts have been identified in the above-listed sections, feasible and enforceable mitigation measures are imposed by this EIR to reduce the Project's impacts to a less than significant level. There are no significant environmental impacts specifically related to construction of the Project's utility and service system connections.

Threshold b:	***Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

The total area of the Project Site and the square footage of the proposed building is below the threshold for which a Water Supply Analysis would be required under SB 610. The City of Redlands is responsible for providing potable water to the Project Site and the entire East Valley Area Plan area. As discussed in the *2020 Urban Water Management Plan* for the City of Redlands, herein incorporated by reference and referred to hereafter as the "UWMP," adequate water supplies are projected to be available to meet the estimated water demand for the City of Redlands' service area through at least 2045 under normal, historic single-dry and historic multiple-dry year conditions (WSC, 2021, pp. 4-19 through 4-23). The City of Redlands' projected water demand are based on the population and development projections of the SCAG, which rely on the adopted land use designations contained within the general plans that cover the geographic area within the City

of Redlands' service area. Because the Project would be consistent with the Countywide Plan land use designation for the Project Site and the East Valley Area Plan land use/zoning designation for the Project Site, the water demand associated with the Project was considered in the City of Redlands' projected demand in the *2020 UWMP* and analyzed therein. As stated above, the City of Redlands expects to have adequate water supplies to meet all its demands until at least 2045; therefore, the City of Redlands has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. No impact would occur.

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

The Project is calculated to generate approximately 13,410 gallons per day (gpd) of wastewater based on wastewater generation factors from the Countywide Plan EIR (1,500 gpd/acre of building area x 8.94 acres of proposed building area = 13,410 gpd). Wastewater generated by the Project would be treated at the Redlands Wastewater Treatment Plant, which abuts the Project Site to the north. The Redlands Wastewater Treatment Plant has an existing treatment capacity of 9,000,000 gpd and, as of 2020, treated an average of 5,900,000 gpd per day (WSC, 2021, p. 4-14). Therefore, the Redlands Wastewater Treatment Plant has available treatment capacity of 3,100,000 gpd. The wastewater generated by the Project would represent approximately 0.4 percent of the excess treatment capacity of the Redlands Wastewater Treatment Plant ([13,410 gpd ÷ 3,100,000 gpd] × 100 = 0.4%); therefore, it is anticipated that the Redlands Wastewater Treatment Plant has sufficient treatment capacity to provide service to the Project. The Project would not require the construction of new or expanded wastewater treatment facilities and no impact would occur.

Threshold d:	***Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity or local infrastructure, or otherwise impair the attainment of solid waste reduction goals?***

Implementation of the Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. Solid waste generated by the Project would be disposed at the County owned and operated Mid-Valley Sanitary Landfill (MVSL). The MVSL is permitted to receive 7,500 tons of refuse per day and has a total capacity of 101,300,000 cubic yards. According to CalRecycle, the MVSL has a total remaining capacity of 61,219,377 cubic yards. The MVSL is estimated to reach capacity, at the earliest time, in the year 2045. (CalRecycle, 2019) During April 2022, the MVSL's peak daily disposal was approximately 5,527 tons, which represents 74 percent of the landfill's maximum permitted daily capacity of 7,500 tons (CalRecycle, 2022).

❑ Construction Impact Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the size of the Project's proposed building and the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds per s.f. for non-residential uses, approximately 845.4 tons of waste is expected to be generated during the Project's construction phase ([380,579 s.f. × 4.34 pounds per s.f.] ÷ 2,000 pounds per ton = 845.4 tons) (EPA, 2009,

Table A-2). California Assembly Bill 939 (AB 939) requires that a minimum of 65% of all solid waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies); therefore, the Project is estimated to generate approximately 295.9 tons during its construction phase. The Project's construction phase is estimated to last for approximately 10 months; therefore, the Project is estimated to generate approximately 2.25 tons of solid waste per day (295.9 tons ÷ 300 days = 0.99 ton per day) requiring landfill disposal during construction.

Non-recyclable construction waste generated by the Project would be disposed at the MVSL. As described above, this landfill receives well below their maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, the MVSL is not expected to reach its total maximum permitted disposal capacities during the Project's construction period. Thus, waste generated by the Project's construction is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at the receiving landfill, no impacts to the MVSL facility would occur during the Project's short-term construction activities.

❑ Operational Impact Analysis

Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of industrial building area obtained from CalRecycle, long-term, on-going operation of the Project would generate approximately 2.77 tons of solid waste per day ([[1.42 pounds ÷ 100 s.f.] × 380,579 s.f.] ÷ 2,000 pounds = 2.77 tons per day) (CalRecycle, n.d.). Pursuant to AB 939, at least 50% of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate a maximum of 1.38 tons of solid waste per day requiring landfilling (2.77 tons per day × 50% = 1.38 tons per day) (CalRecycle, 2018).

Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the MVSL. As described above, this landfill receives well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Furthermore, the MVSL is estimated to have adequate long-term capacity to accept waste from the Project as the landfill would not reach capacity until 2045, at the earliest time, and has opportunities for future expansion. Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at the receiving landfill, impacts to the MVSL facility would occur during Project operation.

Threshold e:	***Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?***

The California Integrated Waste Management Act established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the Act established a 50% waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the San Bernardino County Board of Supervisors adopted the San Bernardino CIWMP,

which outlines the goals, policies, and programs the County and its cities will implement to create an integrated and cost-effective waste management system that complies with the provisions of California Integrated Waste Management Act and its diversion mandates. (SB County, 2018)

San Bernardino County Solid Waste Management Division reviews and approves all new construction projects that require a Construction and Demolition Solid Waste Management Plan (waste management plan). A project's waste management plan consists of two parts which are incorporated into the Conditions of Approval (COA's) by the San Bernardino County Solid Waste Management Division. As part of the plan, proposed projects are required to estimate the amount of tonnage to be disposed and diverted during construction. Disposal/diversion receipts or certifications are required as a part of that summary. The County approval of a Construction and Demolition Solid Waste Management Plan would ensure that impacts related to construction waste would be less than significant.

Under long-term operations, the Project Applicant would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and State programs. Recyclable materials that would be recycled by the Project include paper products, glass, aluminum, and plastic. Additionally, the Project's waste hauler would be required to comply with all applicable local, State, and Federal solid waste disposal standards, thereby ensuring that the solid waste stream to the landfills that serve the Project are reduced in accordance with existing regulations.

Based on the foregoing analysis, the proposed Project would comply with all federal, State, and local statutes and regulations related to solid waste, thereby ensuring that the solid waste stream to the landfill that serves the Project are reduced in accordance with existing regulations. Based on the above analysis, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

5.4.8 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones:	
Threshold a:	***Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?***
Threshold b:	***Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***
Threshold c:	***Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary on ongoing impacts to the environment?***
Threshold d:	***Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as result of runoff, post-fire slope instability, or drainage changes?***

The Project Site is not located adjacent to any wildlands. The Countywide Plan does not identify the Project Site within a fire hazard severity zone and the Project Site and surrounding area are not located within a County fire safety overlay zone (San Bernardino County, 2020, Policy Map HZ-5). According to the California Department of Forestry and Fire Protection (Cal Fire), the Project Site is located within a "Non-Very High Fire Hazard Severity Zone" (Cal Fire, 2008). Accordingly, implementation of the Project would not exacerbate any existing wildfire hazard risks or expose people or the environment to adverse environmental effects related to wildfires.

6.0 ALTERNATIVES

Pursuant to CEQA Guidelines Section 15126.6(a):

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

As demonstrated in Section 4.0 of this EIR, implementation of the Project would not result in significant adverse environmental effects that cannot be mitigated to below a level of significance after the implementation of Project design features, mandatory regulatory requirements, and feasible mitigation measures.

It should be noted that although the Project would not result in any significant and unavoidable impacts, mitigation measures are required to reduce potential significant impacts to levels considered less than significant for the following topical issues: Biological Resources (due to the potential for mortality to burrowing owls and due to the potential to destroy bird nests during Project construction activities), Cultural Resources (due to the potential to encounter pre/protohistoric cultural resources during Project grading), and Greenhouse Gas Emissions (due to the potential for the Project to generate GHG emissions that exceed the County's screening level threshold). The potentially significant impacts to Biological Resources, and Cultural Resources are associated with construction activities, while the potentially significant impact to Greenhouse Gas Emissions are associated with both construction and operation of the Project.

6.1 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR DETAILED ANALYSIS

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible. Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

In determining an appropriate range of alternatives to be evaluated in this EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the project (the objectives for the Project were summarized earlier in this EIR, refer to Section 3.0, *Project Description*), 2) they would not have resulted in a reduction of significant adverse environmental impacts, or 3) they were considered infeasible to construct or operate. A summary of the alternatives that were considered but rejected are described below.

6.1.1 Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to a project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would avoid or substantially lessen any of the significant effects of a project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6(f)(2)).

Historic activities on the Project Site have resulted in pervasive and ongoing disturbance over the last 90+ years. The Project Site does not contain any natural/native habitat and has been heavily disturbed by historic agricultural activities on the Site. Based on review of aerial photography and relevant land use planning maps, there are no other properties in the valley region of the unincorporated County that are reasonably available to the Project Applicant for development and: 1) are large enough to support the proposed Project, 2) have fewer environmental constraints than the Project Site, and 3) have fewer developmental constraints than the Project Site (e.g., distance from sensitive receptors, access to existing roadways and the State highway system, public utilities and infrastructure). Further, none of the significant impacts associated with the Project – all of which can be reduced to less than significant levels with the application of the mitigation measures identified in this EIR – are due to unique conditions on the Project Site and all of the impacts are reasonably expected to occur at other sites in the valley region of unincorporated San Bernardino County.

Lastly, the Project Applicant does not own and is not involved in the acquisition of any property in the unincorporated County that could accommodate the Project, other than the Project Site. CEQA does not require sites that are not owned by the landowner or that could not be reasonably acquired by the landowner to be considered as an alternative to the Project.

In light of the foregoing reasons, a more detailed analysis of alternative development sites is not warranted.

6.2 Alternatives Analysis

The discussion on the following pages compares the environmental impacts expected from each alternative evaluated by the Lead Agency relative to the impacts of the Project. A conclusion is provided for each topic as to whether the alternative results in one of the following: (1) reduction of elimination of the Project's impact, (2) a greater impact than would occur under the Project, (3) the same impact as the Project, or (4) a new impact in addition to the Project's impacts. In addition, the alternatives analysis identifies the ability of each

alternative to meet the basic objectives of the Project. As previously listed in EIR Section 3.0, the Project's basic objectives are:

1. To expand economic development in San Bernardino by developing an underutilized property with an in-demand industrial use within an area that is planned for long-term industrial development.
2. To make efficient use of a property by maximizing its buildout potential for employment-generating uses.
3. To attract employment-generating businesses to San Bernardino County to reduce the need for members of the local workforce to commute outside the area for employment.
4. To develop an industrial building in close proximity to the California highway system that can be used as part of the southern California supply chain and goods movement network.
5. To develop an industrial building on a property with no adjacent sensitive receptors and with operational characteristics that are compatible with other existing and planned land uses in the immediate vicinity of the Project Site.
6. To develop a property that has access to available infrastructure, including roads and utilities.

6.2.1 No Project Alternative

A. Description of the Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR include an alternative that describes what would reasonably be expected to occur on the Project Site in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services (i.e., "No Project" Alternative). For projects that include a revision to an existing land use plan, the "No Project" Alternative may be the continuation of the existing land use plan into the future. For projects other than a land use plan (for example, a development project on a specific property), the "No Project" Alternative is considered to be the circumstance under which the project does not proceed (CEQA Guidelines Section 15126(e)(3)(A-B). Because the Project is consistent with the Countywide Plan land use map and East Valley Area Plan and a land use revision is not required, this EIR analyses the "No Project" scenario where the Project does not proceed and the Project Site remains vacant and undeveloped for the foreseeable future.

B. Comparative Analysis of Environmental Impacts

Provided on the following pages is a comparative analysis of the No Project Alternative and the Project. The focus of this analysis is to determine whether the No Project Alternative is capable of eliminating or reducing the environmental effects that would result from implementation of the Project.

1. Agriculture & Forestry Resources

The No Project Alternative would leave the Project Site, which is designated as "Prime Farmland" by the FMMP, in its existing, non-cultivated condition. This alternative would not commit any portion of the Project Site to a non-agricultural use and the Site would remain available for agricultural production and, as such, this

alternative would avoid the Project's less than significant impacts stemming from the development of a former agriculture property. No forestry resources are located on the Project Site. No significant impacts related to agriculture and forestry resources were identified for the Project and no significant agriculture and forestry resources would occur under this alternative.

2. Air Quality

The No Project Alternative would not involve construction or operational activities. Therefore, the No Project Alternative would avoid all construction- and operational-related air pollutant emissions that would result from the Project.

3. Biological Resources

The No Project Alternative would leave the Project Site in its existing condition, which includes developed/disturbed land with minimal vegetation or habitat areas. No grading would occur under the No Project Alternative and there would be no potential impacts to special-status species that may occupy the Project Site (i.e., burrowing owl) or bird nests that may be present on the Project Site. Although there are mitigation measures identified in EIR Subsection 4.3 that would reduce the Project's direct and cumulatively considerable impacts to biological resources to below a level of significance, implementation of the No Project Alternative would avoid impacts to biological resource associated with the Project and would require no mitigation.

4. Cultural Resources

The No Project Alternative would leave the Project Site in its existing condition; no grading would occur under this alternative and there would be no potential impacts to subsurface archeological resources that may exist beneath the ground surface. Although there are mitigation measures identified in EIR Subsection 4.4 that would reduce the Project's direct and cumulatively considerable impacts to cultural resources to below a level of significance, implementation of the No Project Alternative would avoid impacts to cultural resources associated with the Project and would require no mitigation.

5. Energy

Under the No Project Alternative, the Project Site would remain vacant and undeveloped and would not require the use of any energy resources for construction and operation. Selection of the No Project Alternative would avoid impacts to energy and would reduce the Project's near- and long-term energy use.

6. Geology and Soils

The No Project Alternative would leave the Project Site in its existing condition. The No Project Alternative would not construct any structures on the Project Site; accordingly, there would be no potential for this alternative to expose people or structures to safety risks associated with geologic hazards or to potentially uncover paleontological resources during excavation activities. The No Project Alternative would avoid all impacts to geology and soils that would result from the Project.

7. Greenhouse Gas Emissions

Under the No Project Alternative, no development would occur on the Project Site and there would be no new sources of near-term or long-term GHG emissions from uses on the Site. The No Project Alternative would avoid all GHG emissions that would result from the Project.

8. Hazards and Hazardous Materials

Because no development would occur under the No Project Alternative, no new hazards or hazardous materials would be introduced to the Project Site. Routine weed abatement activities would continue to occur on the Project Site to remove vegetation that has the potential to pose a fire hazard, as required by San Bernardino County. Selection of this alternative would avoid the Project's less than significant impacts related to hazards and hazardous materials.

9. Hydrology and Water Quality

No changes to the Site's existing hydrology and drainage conditions would occur under the No Project Alternative. No stormwater drainage improvements would be constructed on or adjacent to the Project Site and rainfall would continue to be discharged from the Project Site as untreated sheet flow. Under the No Project Alternative, the stormwater leaving the Project Site would not be treated to minimize waterborne pollutants or sediment as it would with the Project which includes an infiltration system to reduce flows discharged off-site. Therefore, the No Project Alternative would result in greater impacts to hydrology and water quality than the proposed Project; however, under this alternative, impacts would remain less than significant.

10. Noise

The No Project Alternative would not involve construction activities; therefore, this alternative would avoid all construction noise and vibration that would result from the Project.

Under the No Project Alternative, no new sources of permanent noise would be introduced on the Project Site. With the exception of noise resulting from routine site maintenance activities (i.e., discing and/or mowing), the No Project Alternative would not produce any noise. Because the Project Site would remain undeveloped, the No Project Alternative would avoid all noise and vibration that would result from Project operations (e.g., vehicle noise, noise from loading and unloading trailers, operation of building systems and on-site equipment).

11. Transportation

The No Project Alternative would not generate any new daily traffic. Accordingly, this Alternative would not result in traffic that could conflict with policies from the San Bernardino Countywide Plan or generate substantial VMT and, also, would not introduce transportation safety hazards to the local area. The No Project Alternative would result in no impact to transportation.

12. Tribal Cultural Resources

The No Project Alternative would leave the Project Site in its existing condition; no grading would occur under this alternative and there would be no potential impacts to subsurface tribal cultural resources that may exist beneath the ground surface. Although there are mitigation measures identified in EIR Subsection 4.12 that would reduce the Project's direct and cumulatively considerable impacts to tribal cultural resources to below a level of significance, implementation of the No Project Alternative would avoid impacts to tribal cultural resources associated with the Project and would require no mitigation.

C. Conclusion

Implementation of the No Project Alternative would result in no physical environmental impacts to the Project Site beyond those that have historically occurred on the Project Site. All potentially significant effects of the Project would be avoided by the selection of this Alternative.

Because the No Project Alternative would not re-develop the Project Site and would not promote local economic development, including through the creation of new jobs and the expansion of the local tax base, the No Project Alternative would fail to meet all of the Project's objectives.

6.2.2 Reduced Building Area Alternative

A. Description of the Alternative

The Reduced Building Area Alternative considers a proposal where the Project Site would be developed with two separate uses: a warehouse distribution building and an outdoor industrial storage area (used for parking tractor trucks and trailers). Under the Reduced Building Area Alternative, approximately 12 acres on the western portion of the Project Site would be developed with an approximately 261,360 s.f., 50-foot-tall warehouse distribution building, including related site improvements such as truck loading/unloading areas and parking, passenger vehicle parking, landscaping, signage, and public utility connections. This alternative also provides for approximately five acres on the eastern portion of the Project Site to be developed with a paved outdoor storage area that would be used for heavy truck (tractor) and/or truck trailer parking (approximately 100 parking spaces). This Alternative was selected by the Lead Agency to evaluate a scenario that would reduce the total building area on the Project Site relative to the Project but still allow productive industrial use of the entire Site.

B. Comparative Analysis of Environmental Impacts

Provided on the following pages is a comparative analysis of the Reduced Building Alternative and the Project. The focus of this analysis is to determine whether the Reduced Building Alternative is capable of eliminating or reducing any potentially significant environmental impacts that would result from implementation of the Project.

1. Agriculture & Forestry Resources

The Reduced Building Alternative would commit the Project Site to industrial (non-agricultural) land uses and would result in the entire Site being covered by impervious surfaces or landscaping. The Reduced Building

Alternative would result in identical, less than significant impacts to agriculture and forestry resources as the Project.

2. Air Quality

Under the Reduced Building Alternative, the overall duration of construction would be similar to the Project. As such, the total amount of air pollutant emissions generated during the construction phase would be similar under the Reduced Building Alternative as compared to the Project. The peak daily intensity of construction activities at the Project Site would be similar under both the Reduced Building Alternative and the Project because both would: 1) disturb the same physical area; 2) utilize the same types of construction equipment; and 3) require the same types of construction activities. Therefore, the total daily emissions during the construction phase would be less than significant and similar to the Project.

Because the Reduced Building Area Alternative would result in approximately 31 percent (119,219 s.f.) less building floor area than the Project, this alternative is expected to require less energy to operate than the Project and, therefore, would result in a reduction of non-mobile source air quality emissions as compared to the Project. The Reduced Building Area Alternative would generate a similar amount of mobile source air pollutant emissions as the Project from heavy truck traffic due to similar daily truck traffic, but it would reduce mobile source air quality emissions from passenger vehicles due to an approximately 19 percent reduction in daily passenger vehicle trips (as a result of fewer employees on site).[1] Due to the reduction in building energy use and the reduction in daily passenger vehicle trips, operation of the Reduced Building Area Alternative would generate less air pollution than the Project, although both the Project and the Reduced Building Area Alternative would result in less than significant impacts.

Because heavy truck trip traffic would be similar between the Reduced Building Area Alternative and the Project (185 daily truck trips under this alternative as compared to 182 daily truck trips for the Project), the Reduced Building Area Alternative would result in similar and less than significant carcinogenic and non-carcinogenic health risk hazards as the Project (due to a similar amount of diesel particulate matter emissions).

Like the Project, the Reduced Building Area Alternative would generate odors during short-term construction activities (e.g., diesel equipment exhaust, architectural coatings, asphalt) and long-term operation (e.g., diesel exhaust). However, and similar to the Project, these odors would occur intermittently, be of short-term duration, and would not be substantial. Long-term operation of the Reduced Building Alternative would not create objectionable odors affecting a substantial number of people and impacts would be less than significant with compliance with mandatory regulatory requirements.

[1]Based on data published by the Institute of Transportation Engineers in their Trip Generation Manual (11th Edition), Western Riverside Council of Governments in their High-Cube Warehouse Trip Generation Study, and traffic counts collected by Urban Crossroads, the Reduced Building Alternative is calculated to generate 510 passenger vehicle trips and 185 truck trips per day (Urban Crossroads, 2022g).

3. Biological Resources

The Reduced Building Alternative would develop the entire Project Site and would result in identical impacts to biological resources as the Project. The Reduced Building Alternative would require the same mitigation measures as the Project and, after mitigation, both the Reduced Building Alternative and the Project would result in less than significant impacts to biological resources.

4. Cultural Resources

The Reduced Building Alternative would develop the entire Project Site and would result in identical impacts to cultural resources as the Project. The Reduced Building Alternative would require the same mitigation measures as the Project and, after mitigation, both the Reduced Building Alternative and the Project would result in less than significant impacts to cultural resources.

5. Energy

The Reduced Building Area Alternative would require less energy to construct and operate than the Project due to the approximate 31 percent reduction in building floor area. Additionally, the Reduced Building Area Alternative would generate 19 percent fewer daily passenger vehicle trips (approximately 120 trips) than the Project due to a reduction in employees on site and, therefore, would reduce transportation energy demands in comparison to the Project (transportation energy demands for heavy trucks would be similar between the Project and the Reduced Building Area Alternative). Both the Project and the Reduced Building Area Alternative would result in a less than significant impact.

6. Geology and Soils

Th Reduced Building Alternative would disturb the same physical area as the Project and would, therefore, have the same potential for soil erosion during the construction phase as the Project. Soil erosion impacts would be less than significant under both the Project and the Reduced Building Area Alternative due to mandatory compliance with federal, State, and local water quality standards. The Reduced Building Area Alternative would be required to comply with the same mandatory regulatory requirements as the Project to preclude substantial hazards associated with seismic ground shaking and geologic hazards. The Reduced Building Area Alternative would result in a similar, less than significant impact to geology and soils as the Project.

7. Greenhouse Gas Emissions

Because the Reduced Building Area Alternative would result in the development of less building floor area than the Project, the Reduced Building Area Alternative is expected to require less energy to construct and operate than the Project and, therefore, would result in a reduction of non-mobile source GHG emissions as compared to the Project. Additionally, the Reduced Building Area Alternative would result in an incremental reduction in mobile source GHG emissions due to a reduction in daily passenger vehicle traffic (approximately 19 percent, or 120 daily trips). In total, the Reduced Building Area Alternative would slightly reduce GHG emissions associated with the Project; however, the Project would result in a less than significant impact related

to GHG emissions; therefore, the Reduced Building Area Alternative would not avoid a significant environmental impact related to GHG emissions.

8. Hazards and Hazardous Materials

Neither implementation of the Reduced Building Area Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Land uses that would occur on the Project Site under the Reduced Building Area Alternative would have a similar potential to handle and store hazardous materials as would the Project. Like the proposed Project, the Reduced Building Area Alternative would be required to safely dispose the potential sources of on-site contamination during construction. With mandatory regulatory compliance, both the Reduced Building Area Alternative and the Project would pose a less than significant hazard to the public and the environment related to the use, handling, storage, and/or transport of hazardous materials.

9. Hydrology and Water Quality

Neither the Project nor the Reduced Building Area Alternative would result in substantial alterations to the drainage pattern of the Site or would result in substantial erosion effects. Accordingly, implementation of the Project and the Reduced Building Area Alternative would both result in less than significant impacts to existing drainage patterns.

During construction, potential hydrology and water quality effects on the Project Site would be similar under both the Reduced Building Area Alternative and the Project because this Alternative and the Project would disturb the same physical area. Like the Project, the Reduced Building Area Alternative would be required to implement a SWPPP to ensure that stormwater runoff during construction does not contain substantial pollutant concentrations. Both the Project and the Reduced Building Area Alternative would result in less than significant construction impacts to hydrology and water quality.

In the long-term, potential hydrology and water quality effects on the Project Site would be similar under both the Reduced Building Area Alternative and the Project due to both providing a similar amount of non-pervious surfaces. Like the Project, the Reduced Building Area Alternative would be required to implement a drainage plan to ensure that stormwater runoff is conveyed to local and regional stormwater drainage facilities with adequate capacity to handle runoff flows from the Project Site. Additionally, like the Project, the Reduced Building Area Alternative would be required to implement a long-term WQMP to ensure that stormwater runoff leaving the Project Site does not contain substantial pollutant concentrations. Both the Project and the Reduced Building Area Alternative would result in less than significant operational impacts to hydrology and water quality.

10. Noise

The Reduced Building Area Alternative would generate similar, less than significant short-term construction noise levels as the Project, as both the Project and the Reduced Building Area Alternative would utilize similar construction equipment and would require similar construction activities. Under long-term operational conditions, the Project and Reduced Building Area Alternative would result in similar, less than significant

noise levels due to relatively similar operational practices (i.e., cargo loading/unloading activities) and similar daily heavy truck traffic volumes.

11. Transportation

The Reduced Building Area Alternative would generate similar types of vehicular traffic as the Project (i.e., a similar mix of passenger vehicles and 2-, 3- and 4+ axle trucks) and is expected to have a similar, less than significant impact as the Project related to compatibility with local land uses and transportation safety hazards. The Reduced Building Area Alternative is anticipated to result in a similar amount of home-based work VMT as the Project, which the County evaluates as the average number of miles each employee drives to or from the Project Site, but would result a reduction in total aggregate VMT due to the fewer number of employees on site. Notwithstanding, both the Project and the Reduced Building Area Alternative would result in a less than significant impact from VMT.

12. Tribal Cultural Resources

The Reduced Building Alternative would develop the entire Project Site and would result in identical impacts to tribal cultural resources as the Project. The Reduced Building Alternative would require the same mitigation measures as the Project and, after mitigation, both the Reduced Building Alternative and the Project would result in less than significant impacts to tribal cultural resources.

C. Conclusion

The Reduced Building Area Alternative would incrementally reduce the Project's less than significant effects to air quality, energy, and greenhouse gas emissions. The Reduced Building Area Alternative would result in less than significant effects that are similar to the Project under the topics of agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation, and tribal cultural resources.

The Reduced Building Area Alternative would fail to meet Project Objective #2[2] and would be less effective than the Project at achieving Project Objective #3[3] because this alternative would result in a substantial reduction in the development of an in-demand, employment generating land use on the Project Site. The Reduced Building Area Alternative would meet all other Project Objectives.

1. To make efficient use of a property by maximizing its buildout potential for employment-generating uses.
2. To attract employment-generating businesses to San Bernardino County to reduce the need for members of the local workforce to commute outside the area for employment.

[2] "To make efficient use of a property by maximizing its buildout potential for employment-generating uses."
[3] "To attract employment-generating businesses to San Bernardino County to reduce the need for members of the local workforce to commute outside the area for employment."

6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to a project site and its surrounding environment. The No Project Alternative would avoid or reduce all of the Project's environmental impacts and, therefore, can be considered environmentally superior to the Project. However, pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, if a "no project" alternative is identified as environmentally superior to a proposed project then the EIR shall select an environmentally superior alternative among the other alternatives. Additionally, CEQA does not mandate the selection of the "environmentally superior" project if, through mitigation measures alone, the agency has adequately reduced a project's environmental effects to a less than significant level (83 Cal.3d at 521; see also *Rio Vista Farm Bureau Ctr. v. County of Solano* (1992) 5 Cal.App.4th 351, 379). Accordingly, for purposes of this EIR, there is no need to identify an environmentally superior alternative because the one alternative that would clearly avoid the Project's environmental impacts is classified as a "no project" alternative and the remaining alternative evaluated herein would not avoid or reduce any significant environmental impacts, as the Project would not result in any significant and unavoidable impacts to the environment with implementation of the mitigation measures in this EIR and compliance with applicable regulations (as demonstrated in the analysis in Section 4.0 of this EIR). Therefore, there are no alternatives evaluated in this EIR that would be considered environmentally superior to the Project.

7.0 REFERENCES

7.1 PERSONS CONTRIBUTING TO EIR PREPARATION

7.1.1 SAN BERNARDINO COUNTY PLANNING DIVISION

Steven Valdez, Planning Manager

Cheryl Tubbs, Vice President, Lilburn Corporation (San Bernardino County Peer-Review Consultant)

7.1.2 T&B PLANNING, INC.

Tracy Zinn, AICP, Principal

David Ornelas, Senior Project Manager

Justin Nguyen, Environmental Analyst

Cristina Maxey, GIS/Graphics Manager

Rhea Smith, GIS/Graphics Technician

7.2 DOCUMENTS APPENDED TO THIS EIR

The following reports, studies, and supporting documentation were used in preparing this EIR and are bound separately as Technical Appendices. The Technical Appendices are incorporated by reference and available for review at the San Bernardino County Planning Division, 385 N. Arrowhead Ave., San Bernardino, CA 92415.

Appendix A: Notice of Preparation and Written Comments on the NOP
Appendix B: Air Quality Impact Analysis, prepared by Urban Crossroads
Appendix C: Mobile Source Health Risk Assessment, prepared by Urban Crossroads
Appendix D: Biological Resources Report, prepared by Alden Environmental
Appendix E: Cultural Resources Study, prepared by Brian F. Smith and Associates
Appendix F: Energy Analysis, prepared by Urban Crossroads
Appendix G: Geotechnical Investigation, prepared by Southern California Geotechnical
Appendix H: Paleontological Assessment, prepared by Brian F. Smith and Associates
Appendix I: Greenhouse Gas Analysis, prepared by Urban Crossroads
Appendix J: Phase I Environmental Site Assessment, prepared by V3 Companies
Appendix K: Phase II Environmental Site Assessment, prepared by Partner Science and Engineering
Appendix L: Preliminary Drainage Report, prepared by Thienes Engineering
Appendix M: Preliminary Water Quality Management Plan, prepared by Thienes Engineering
Appendix N: Noise Analysis, prepared by Urban Crossroads
Appendix O: Vehicle Miles Traveled (VMT) Screening Analysis, prepared by Urban Crossroads
Appendix P: Trip Generation Assessment, prepared by Urban Crossroads

7.3 Documents Incorporated by Reference

The following reports, studies, and supporting documentation were used in the preparation of this EIR and are incorporated by reference within this EIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed.

Cited As:	***Cited As:***
San Bernardino County, 2017	San Bernardino County, 2017. Multi-Jurisdictional Hazard Mitigation Plan. July 13, 2017. Web. Available: https://countywideplan.com/wp-content/uploads/sites/68/2020/10/SBC_MJHMP_FEMAapproved_20170713.pdf
San Bernardino County, 2019	San Bernardino County, 2019. Countywide Plan DEIR. Web. Available: https://countywideplan.com/wp-content/uploads/sites/68/2021/02/EJ-Legacy_CWP_BackgroundReport_FinalDraft_20190930.pdf
San Bernardino County, 2020a	San Bernardino County, 2020a. Countywide Plan. Web. Available: https://countywideplan.com/
San Bernardino County, 2020b	San Bernardino County, 2020b. Web. Available: Countywide Plan EIR. Web. Available: https://countywideplan.com/resources/document-download/

7.4 Documents and Websites Consulted

Cited As:	***Cited As:***
CA Legislative Info., n.d.	CA Legislative Information, n.d. California Health and Safety Code Section 5097.98. Web. Available: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5097.98
CA Legislative Info., n.d.	California Legislative Information, n.d. ARTICLE 1.7 Disclosure of Natural and Environmental Hazards, Right-to-Farm, and other Disclosures Upon Transfer of Residential Property. Web. Available: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1103.2.&lawCode=CIV
CA Legislative Info., n.d.	CA Legislative Info. (n.d.). Fish and Game Code Division 4. Web. Available: http://www.leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=4.&chapter=1.&part=2.&lawCode=FGC
CA Legislative Info., n.d.	California Legislative Information, n.d. Hazardous Waste Control. Web. Available: https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=HSC&division=20.&title=&part=&chapter=6.5.&article=

Cited As:	***Cited As:***
CA Legislative Info., n.d.	California Legislative Information, n.d. The Alquist-Priolo Earthquake Fault Zoning Act. Web. Available: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=2.&chapter=7.5.&lawCode=PRC
CA Legislative Info., n.d.	California Legislative Information, n.d. SB-32 California Global Warming Solutions Act of 2006. Web. Available: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32
CA Legislative Info., n.d.	California Legislative Information, n.d. SB-97 CEQA: greenhouse gas emissions. Web. Available: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB97
CA Legislative Info., n.d.	California Legislative Information, n.d. Senate Bill Number 107 Renewable Energy: Public Interest Energy Research, Demonstration, and Development Program. Web. Available: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200520060SB107
CA Legislative Info., n.d.	California Legislative Information, n.d. Senate Bill Number 1078 Housing. Web. Available: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1078
CA Legislative Info., n.d.	California Legislative Information, n.d. California Water Code. Web. Available: https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=WAT&tocTitle=+Water+Code+-+WAT
CA Legislative Info., n.d.	CA Legislative Info. (1978). CA Solar Rights and Solar Shade Control Act. Web. Available: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=15.&title=&part=&chapter=12.&article=
CA State Library, 2005	California State Library, 2005. Executive Order S-3-05. June 1, 2005. Web. Available: https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf
CA State Library, 2007	California State Library, 2007. Executive Order S-01-07. January 18, 2007. Web. Available: https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5107-5108.pdf
CA State Library, 2008	California State Library, 2008. Executive Order S-14-08. November 17, 2008. Web. Available: https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/38-S-14-08.pdf
Cal Fire, 2008	California Department of Forestry and Fire Protection (Cal Fire), 2008. Very High Fire Hazard Severity Zones in LRA; San Bernardino County. Web. Available: https://egis.fire.ca.gov/FHSZ/

Cited As:	***Cited As:***
CalRecycle, 2018	California Department of Resources Recycling and Recovery (CalRecycle), 2018. History of California Solid Waste Law, 1985-1989. Web. Available: https://www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989
CalRecycle, 2019	CalRecycle, 2019. Mid-Valley Landfill. Web. Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662
CalRecycle, 2022	CalRecycle, 2022. 5/23 Inspection Report. Web. Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Details/341667
CalRecyle, n.d.	CalRecycle, n.d. Estimated Solid Waste Generation Rates. Web. Available: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates
Caltrans, 2020	California Department of Transportation (Caltrans). 2020, January. Construction Manual. Web. Available: https://dot.ca.gov/programs/construction/construction-manual
Caltrans, 2022	Caltrans, 2022. Scenic Highway. Web. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
CARB, 2012	California Air Resources Board (CARB), 2012. Air Quality and Transportation Planning. June 27, 2012. Web. Available: https://www.arb.ca.gov/planning/planning.htm
CARB, 2018	California Air Resources Board (CARB), 2018. AB 32 Global Warming Solutions Act of 2006. September 28, 2018. Web. Available: https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006
CARB, 2021	California Air Resources Board (CARB), 2021. Advanced Clean Trucks Fact Sheet. August 20, 2021. Web. Accessed July 9, 2020. Available: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet
CARB, n.d.	California Air Resources Board (CARB), n.d. Truck & Bus Regulation. Web. Available: https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation/about
CARB, n.d.	California Air Resources Board (CARB), n.d. Sustainable Communities and Climate Protection Program (SB 375). Web. Available: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about
CAWSI, n.d.	California Agriculture Water Stewardship (CAWSI), n.d. Dry Farming. California Ag Water Stewardship Initiative. Web. Available: http://agwaterstewards.org/practices/dry_farming/
CBSC, 2020	California Building Standards Code (CBSC), 2020. Title 24. January 1, 2020. Web. Available: https://www.dgs.ca.gov/BSC/Codes

Cited As:	***Cited As:***
CCCC, 2006	California Climate Change Center (CCCC), 2006. Scenarios of Climate Change in California: An Overview. February, 2006. Web. Available: https://www.sustainable-design.ie/arch/California2006_Climate-Change-Scenarios.pdf
CDC, 1997	California Department of Conservation (CDC), 1997. California LESA Instruction Manual. Web. https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx
CDC, 2004	California Department of Conservation (CDC), 2004. A Guide to the Farmland Mapping and Monitoring Program. Web. Available: http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp_guide_2004.pdf
CDC, n.d.	California Department of Conservation (CDC), n.d. Seismic Hazards Mapping Act. Web. Available: https://www.conservation.ca.gov/cgs/shma
CDFW, n.d.	California Department of Fish and Wildlife (CDFW), n.d. California Endangered Species Act (CESA) Permits. Web. Available: https://wildlife.ca.gov/Conservation/CESA/Permitting
CDFW, n.d.	CDFW, n.d. California Laws Protecting Native Plants. Web. Available: https://www.wildlife.ca.gov/Conservation/Plants/Laws
CDFW, n.d.	CDFW, n.d. Natural Community Conservation Planning (NCCP). Web. Available: https://www.wildlife.ca.gov/conservation/planning/ncc
CEC, 2018	California Energy Commission (CEC), 2018. 2019 Building Energy Efficiency Standards or Residential and Nonresidential Buildings. December, 2018. Web. Available: https://www.energy.ca.gov/publications/2008/2019-building-energy-efficiency-standards-residential-and-nonresidential
CEC, n.d.	California Energy Commission (CEC), n.d. Emission Performance Standard – SB 1368. Web. Available: https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/emission-performance-standard-sb-1368
CGS, 2022	California Geological Survey (CGS), 2022. Fault Activity Map of California. Web. Available: https://maps.conservation.ca.gov/cgs/fam/
City of Redlands, 2017	City of Redlands, 2017. General Plan 2035. December 5, 2017. Web. Available: https://www.cityofredlands.org/sites/main/files/file-attachments/gp2035.pdf?1554321255

Cited As:	***Cited As:***
CNRA, 2021	California Natural Resources Agency (CNRA), 2021. Draft California Climate Adaptation Strategy. October 18, 2021. Web. Available: https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Climate-Resilience/SAS-Workshops/Draft-CA-Climate-Adaptation-Strategy-ada.pdf
DOJ, 2021	Department of Justice (DOJ), 2021. Massachusetts v. EPA. August 10, 2021. Web. Available: https://www.justice.gov/enrd/massachusetts-v-epa
DWR, 2020	California Department of Water Resources (DWR), 2020. Basin Prioritization. May 1, 2020. Web. Available: https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization
DWR, n.d.	California Department of Water Resources (DWR), n.d. Sustainable Groundwater Management Act (SGMA). Web. Available: https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management
DWR, 2004	California Department of Water Resources (DWR), 2004. Bunker Hill Subbasin. Web. Available: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/8_002_06_BunkerHillSubbasin.pdf
EPA, 2009	Environmental Protection Agency (EPA), 2009. Estimating 2003 Building-Related Construction and Demolition Materials Amounts. Web. Available: https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf
EPA, 2017	Environmental Protection Agency (EPA), 2017. Learn About SmartWay. Available: https://www.epa.gov/smartway/learn-about-smartway
EPA, 2020	Environmental Protection Agency (EPA), 2020. 1990 Clean Air Act Amendment Summary: Title I. October 13, 2020. Web. Available: https://www.epa.gov/clean-air-act-overview/1990-clean-air-act-amendment-summary-title-i
EPA, 2020a	Environmental Protection Agency (EPA), 2020a. Summary of Clean Water Act. September 9, 2020a. Web. Available: https://www.epa.gov/laws-regulations/summary-clean-water-act
EPA, 2020a	Environmental Protection Agency (EPA), 2020a. Summary of Clean Water Act. September 9, 2020a. Web. Available: https://www.epa.gov/laws-regulations/summary-clean-water-act
EPA, 2021a	Environmental Protection Agency (EPA), 2021a. Summary of the Clean Air Act. September 28, 2021a. Web. Available: https://www.epa.gov/laws-regulations/summary-clean-air-act
EPA, 2021a	Environmental Protection Agency (EPA), 2021a. Summary of the Clean Air Act. September 28, 2021a. Web. Available: https://www.epa.gov/laws-regulations/summary-clean-air-act

Cited As:	***Cited As:***
EPA, 2021a	Environmental Protection Agency (EPA), 2021a. Summary of the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). September 28, 2021a. Web. Available: https://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act
EPA, 2021b	Environmental Protection Agency (EPA), 2021b. Summary of Resource Conservation and Recovery Act. September 28, 2021b. Web. Available: https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act
EPA 2021c	Environmental Protection Agency (EPA), 2021c. Summary of the Occupational Health and Safety Act. October 22, 2021c. Web. Available: https://www.epa.gov/laws-regulations/summary-occupational-safety-and-health-act
EPA, 2021d	Environmental Protection Agency (EPA), 2021d. Summary of the Toxic Substances Control Act. September 9, 2021d. Web. Available: https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act
EPA, 2021	EPA. 2021, September 28. Summary of the Noise Control Act. Web. Available: https://www.epa.gov/laws-regulations/summary-noise-control-act
FEMA, 2008	Federal Emergency Management Agency. (FEMA), 2008. Firm Number 06071C8704H. Web. Available: https://map1.msc.fema.gov/firm?id=06071C8704H
FHWA, 2017	Federal Highway Administration. 2017, June 6. Highway Traffic Noise. Web. Available: https://www.fhwa.dot.gov/environment/noise
FTA, 2006	FTA, 2006. Transit Noise and Vibration Impact Assessment. Web. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf
Google Earth, 2022	Google Earth, 2022.
NAHC, n.d.	Native American Heritage Commission (NAHC), n.d. State Laws and Codes. Web. Available: http://nahc.ca.gov/codes/state-laws-and-codes/
NPS, 2021a	National Park Service (NPS), 2021a. The National Historic Preservation Program: Overview. March 30, 2021a. Web. Available: https://www.nps.gov/archeology/tools/laws/nhpa.htm
NPS, 2021b	National Park Service (NPS), 2021b. National Register of Historic Placed FAQ. May 6, 2021b. Web. Available: https://www.nps.gov/subjects/nationalregister/faqs.htm
NPS, 2021c	National Park Service (NPS), 2021c. National Historic Landmarks Program. February 2, 2021c. Web. Available: https://www.nps.gov/orgs/1582/index.htm

Cited As:	*Cited As:*
NPS, 2021d	National Park Service (NPS), 2021d. The Native American Graves Protection and Repatriation Act. March 30, 2021d. Web. Available: https://www.nps.gov/archeology/tools/laws/nagpra.htm
NPS, n.d.	National Park Service (NPS), n.d. CA Administrative Code, Title 14, Section 4308. Web. Available: https://www.parks.ca.gov/pages/627/files/california%20code%20of%20regulations.doc
NRCS, 2022	Natural Resources Conservation Service (NRCS), 2022. Soil Map Viewer. Web. Available: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
OHP, n.d.	Office of Historic Preservation (OHP), n.d. California Register of Historic Resources. Web. Available: http://ohp.parks.ca.gov/?page_id=21238
OPR, 2017	Office of Planning and Research (OPR), 2017. Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA. Web. Available: http://nahc.ca.gov/wp-content/uploads/2017/06/Technical-Advisory-AB-52-and-Tribal-Cultural-Resources-in-CEQA.pdf
OSHA, n.d.	Occupational Safety and Health Administration (OSHA), n.d. California State Plan. Web. Available: https://www.osha.gov/stateplans/ca
OSHA, n.d.	Occupational Safety and Health Administration (OSHA), n.d. Trucking Industry. Web. Available: https://www.osha.gov/trucking-industry
OSHA, 2002	OSHA, 2002. Hearing Conservation. Web. Available: https://www.osha.gov/sites/default/files/publications/osha3074.pdf
San Bernardino County, 2021	San Bernadino County, 2021. GHG Reduction Plan. Web. Available: https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf
San Bernardino County AWM, 2001	San Bernardino County, Agriculture Weights & Measures, 2001. 2000 Crop Report. Web. Available: https://cms.sbcounty.gov/Portals/13/CropReports/2000CropReport.pdf
San Bernardino County AWM, 2021	San Bernardino County Agriculture Weights & Measures, 2021. 2020 Crop Report. Web. Available: https://cms.sbcounty.gov/Portals/13/AWM%20CROP%20REPORT%202020%20080521.pdf?ver=2021-08-05-160649-640

Cited As:	***Cited As:***
San Bernardino County, 2018	San Bernardino County, 2018. Countywide Integrated Waste Management Plan. Web. Available: https://www.sbcounty.gov/uploads/DPW/docs/SB-County-Final-Draft-Summary-Plan-SP-for-SWAT-07-2018r.pdf
SBAG, 2016	San Bernardino Associated Governments (SBAG), 2016. San Bernardino County Congestion Management Program. June 2016. Web. Available: https://www.gosbcta.com/wp-content/uploads/2019/10/2016-Congestion-Management-Plan-.pdf
SCAG, 2020a	Southern California Association of Governments (SCAG), 2020a. Demographics and Growth Forecast Appendix. September 3, 2020a. Web. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579
SCAG, 2020b	Southern California Association of Governments (SCAG), 2020b. 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. September 3, 2020b. Web. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176
SCAQMD, 2003	South Coast Air Quality Management District (SCAQMD), 2003. White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Web. Available: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pd
SCAQMD, 2005	South Coast Air Quality Management District (SCAQMD), 2005. Rule 403. Web. Available: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4
SCAQMD, 2017a	South Coast Air Quality Management District (SCAQMD), 2017a. Air Quality Management Plan. March, 2017a. Web. Available: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15
SCAQMD, 2022	South Coast Air Quality Management District (SCAQMD), 2022. MATES V Data Visualization Tool. Web. Available: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38
SCAQMD, n.d.	South Coast Air Quality Management District (SCAQMD), n.d. Authority. Web. Available: https://www.aqmd.gov/nav/about/authority
SWRCB, 2014	State Water Resources Control Board (SWRCB), 2014. Federal, State, and Local Laws; Policy and Regulations. Web. Available: https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/0a_laws_policy.html

Cited As:	***Cited As:***
SWRCB, 2014	State Water Resources Control Board (SWRCB), 2014. Federal, State, and Local Laws; Policy and Regulations. Web. Available: https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/0a_laws_policy.html
SWRCB, 2016	State Water Resources Control Board (SWRCB), 2016. A compilation of Water Quality Goals. Web. Available: https://www.waterboards.ca.gov/water_issues/programs/water_quality_goals/docs/wq_goals_text.pdf
SWRCB, 2017	State Water Resources Control Board (SWRCB), 2017. Watershed Management. August 3, 2017. Web. Available: https://www.waterboards.ca.gov/water_issues/programs/watershed/
SWRCB, 2020	State Water Resources Control Board (SWRCB), 2020. Industrial General Permit. July 1, 2020. Web. Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/industrial/unoff_igp_amend.pdf
UC, 1978	University of California (UC), 1978. Storie Index Soil Rating. Web.Available: http://anrcatalog.ucanr.edu/pdf/3203.pdf
UNFCCC, n.d.	United Nations Framework Convention on Climate Change (UNFCCC), n.d. The Paris Agreement. Web. Available: https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement
UNFCCC, n.d.	United Nations Framework Convention on Climate Change (UNFCCC), n.d. What is the Kyoto Protocol? Web. Available: https://unfccc.int/kyoto_protocol
USCB, 2012	United States Census Bureau (USCB). 2012, March 11. 2010 Census Urbanized Area Reference Map: Riverside - San Bernardino, CA. Web. Available: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside--san_bernardino_ca/DC10UA75340_002.pdf
USCD, n.d.	United States Climate Data (USCD), n.d. U.S. Climate Data. Web Available: https://www.usclimatedata.com/climate/redlands/california/united-states/usca0923
USDA, 2022	United States Department of Agriculture (USDA), 2022. Web Soil Survey. Available: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
USFWS, 2017	United States Fish and Wildlife Service (USFWS). 2017, February. ESA Basics. Web. Available: https://www.fws.gov/sites/default/files/documents/endangered-species-act-basics.pdf
USFWS, 2020	USFWS. 2020, April 16. Migratory Bird Treaty Act. Web. Available: https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php

Cited As:	***Cited As:***
WRCC, n.d.	Western Regional Climate Center (WRCC), n.d. Monthly Climate Summary, Redlands, California. Web. Available: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7306
WSC, 2021	Water Systems Consulting, Inc, 2021. 2020 Part 2: Local Agency UWMPs Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. Web. Available: https://wuedata.water.ca.gov/public/uwmp_attachments/9115705192/Part%202%20Chapter%204_Redlands%202020%20UWMP_Final.pdf