

Project Lion Substation for Conditional Use Permit (PCUP25-002)

Addendum to the Merrill Commerce Center Specific Plan
Final Environmental Impact Report

Lead Agency:

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1. INTRODUCTION

1.1 Purpose of the Addendum

This Addendum to the certified Merrill Commerce Center Specific Plan (MCCSP) Final Environmental Impact Report (“Certified EIR”) (State Clearinghouse No. 2019049079) (Applied Planning, 2020) has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.); the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] Section 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Ontario (City).

The Certified EIR evaluated environmental impacts associated with full buildout of the MCCSP, including up to 8,455,000 square feet of industrial and business park development on approximately 376.3 acres (herein, “Approved Project”). The Certified EIR expressly contemplated large-scale warehouse and refrigerated cold-storage uses, including up to 701,400 square feet of high-cube cold storage warehouse use, and analyzed associated impacts (e.g., energy demand, utility consumption, air quality, greenhouse gas emissions, and infrastructure needs), assuming worst-case level to accommodate site-specific development over time.

The City has approved a site-specific warehouse distribution facility within the MCCSP area, consisting of an approximately 785,803-square-foot warehouse, including approximately 700,000 square feet of refrigerated storage, together with a 41,923-square-foot truck maintenance garage on approximately 56.52 acres within Planning Areas 6 and 6A. That warehouse distribution development is consistent with the MCCSP and remains within the development assumptions and impact envelope analyzed in the Certified EIR.

The sole purpose of this Addendum is to evaluate whether the construction and operation of a private on-site electrical substation, proposed to provide permanent electrical service to the approved warehouse facility, would result in new significant environmental effects or a substantial increase in the severity of previously identified impacts, pursuant to State CEQA Guidelines Sections 15162 and 15164. No other components of the warehouse distribution project are modified for purposes of CEQA, and therefore no re-evaluation of warehouse related impacts or energy demand is required.

1.2 Project Background

On February 2, 2021, the City Council approved the introduction (first reading) of Ordinance No. 3178 for the Merrill Commerce Center Specific Plan (MCCSP), adopted Resolution No. R2021-011, certifying the MCCSP Final Environmental Impact Report (Certified EIR; State Clearinghouse No. 2019049079), and adopted Resolution No. R2021-012 approving the associated General Plan Amendment (File No. PGPA18-003), establishing the land use plan for the MCCSP area. On February 16, 2021, the City Council adopted (second reading) Ordinance No. 3178, thereby approving the MCCSP (File No. PSP18-001). The MCCSP establishes land use designations, development standards, design guidelines, and an implementation framework for approximately 376.3 acres, accommodating up to 8,455,000 square feet of industrial and business park development.

Following the adoption of the MCCSP and certification of the Certified EIR, the City approved a Development Plan (PDEV23-015) in November 2023 for construction of a large industrial warehouse facility within Planning Areas 6 and 6A. In December 2024, in response to market conditions and the operational requirements of prospective tenants, the Project Applicant requested modifications to the

approved Development Plan to reduce the overall building square footage and incorporate refrigerated cold storage uses.

The Planning Director reviewed the proposed modifications and determined that the revised Development Plan, including the reduction in floor area and incorporation of refrigerated cold storage, was in substantial conformance with the previously approved Development Plan, the MCCSP and the environmental assumptions and impact analysis contained in the Certified EIR. Accordingly, no additional environmental review was required for those modifications. While operation of refrigerated cold storage within the warehouse is subject to approval of a Conditional Use Permit, the environmental effects associated with refrigerated warehouse uses were fully analyzed and disclosed in the Certified EIR and are not the subject of this Addendum.

The Certified EIR expressly contemplated energy-intensive industrial uses, including refrigerated warehouse and cold-storage facilities, and evaluated associated electrical demand as part of the MCCSP's worst-case buildout analysis. However, in October 2025, Southern California Edison (SCE) determined that the approved facility's continuous electrical demand of approximately 30 megawatts (MW) exceeds the capacity of the existing local distribution system. As a result, SCE determined that permanent electrical service must be provided directly from its regional 66,000-volt (66-kV) transmission grid via a new on-site electrical substation. Delivery of this service would require construction of two new dedicated 66-kV feeders from an existing SCE regional substation to the Project site.

SCE further advised that development of a privately owned and operated substation would substantially reduce the timeline for delivery of permanent electrical service (from approximately seven years to approximately three and one-half years). Based on this determination, the Project Applicant elected to pursue private ownership and development of the on-site substation.

The Certified EIR assumed that electrical facilities sufficient to serve refrigerated warehouse operations would be provided; however, the precise configuration and location of electrical service infrastructure for individual sites is determined at the project-implementation stage.¹ Accordingly, the City has requested preparation of this Addendum to the Certified EIR to evaluate whether construction and operation of the proposed private on-site substation, as a site-specific utility delivery improvement, would result in any new significant environmental effects or a substantial increase in the severity of impacts previously identified in the Certified EIR.

Therefore, this Addendum evaluates only the environmental effects associated with construction and operation of the private on-site electrical substation. The approved warehouse distribution development and the refrigerated cold storage use authorized through the Conditional Use Permit remain fully covered by the Certified EIR and the City's prior consistency determinations. No re-evaluation of warehouse or cold-storage impacts is undertaken herein. This Addendum is prepared solely pursuant to State CEQA Guidelines Sections 15162 and 15164 to address the substation component of the Project.

1.3 Statutory Authority and Requirements

The City of Ontario is the Lead Agency for the Project under CEQA. When only limited changes or additions to a previously certified EIR are proposed, and none of the conditions described in State CEQA Guidelines Section 15162 are met, CEQA allows the lead agency to prepare an addendum to a previously certified EIR (State CEQA Guidelines Section 15164[a]).

¹ Certified EIR, Page 4.12-44

State CEQA Guidelines Section 15164 states the following concerning an Addendum to an EIR:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

State CEQA Guidelines Section 15162(a) specifies that when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would, in fact, be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to State CEQA Guidelines Section 15162(b), if changes to a project or its circumstances occur or new information becomes available after adoption of an EIR, the Lead Agency shall determine whether a subsequent EIR is required or whether an addendum or no further documentation is appropriate.

New or revised State CEQA Guidelines Appendix G significance thresholds do not constitute “new information” requiring preparation of a subsequent EIR.² State CEQA Guidelines Section 15164(a) expressly provides that an addendum is the appropriate form of environmental documentation when limited changes are proposed and none of the conditions requiring a subsequent EIR are present.

As described above, the only change evaluated in this Addendum is the addition of a private on-site electrical substation to serve an already approved warehouse distribution and refrigerated cold-storage facility. The warehouse distribution development, including refrigerated storage operations and associated energy demand, was previously analyzed and disclosed in the Certified EIR and is not subject to further environmental review under this Addendum.

1.4 Summary of Analysis and Findings

Based on the analysis of potential environmental consequences associated solely with construction and operation of the proposed private on-site electrical substation (see **Section 3.0: Environmental Impact Analysis**), the Proposed Project would not result in any new significant environmental effects or a substantial increase in the severity of impacts previously identified in the Certified EIR.

As demonstrated in this Addendum, the environmental impacts associated with the substation would be within, or less than, the range of impacts anticipated for infrastructure supporting industrial and refrigerated warehouse uses under the MCCSP’s full buildout scenario analyzed in the Certified EIR. No substantial changes to Project circumstances have occurred, and no new information has been identified that would trigger the need for a subsequent EIR pursuant to State CEQA Guidelines Section 15162.

Accordingly, preparation of this Addendum pursuant to State CEQA Guidelines Section 15164 is the appropriate level of environmental documentation. In taking action on the Project, including approval of the Addendum, the decision-making body shall consider the Certified EIR together with this Addendum as part of the complete administrative record.

1.5 Incorporation by Reference

State CEQA Guidelines Section 15150 encourages incorporation by reference of documents that contain relevant environmental data and analysis and are reasonably available to the public. The following documents, which provide environmental context and analysis relied upon in preparation of Addendum, are incorporated by reference and are part of the public record.

- City of Ontario Policy Plan (General Plan) and General Plan EIR (SCH No. 2008101140)
- Merrill Commerce Center Specific Plan (T&B Planning, 2021)
- Merrill Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2019049079) (Applied Planning, 2020)

² *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301.

2. PROPOSED PROJECT DESCRIPTION

2.1 Proposed Project Location and Setting

For the purposes of this Addendum, the Proposed Project consists solely of the construction and operation of a private on-site electrical substation to serve an approved warehouse development within the Merrill Commerce Center Specific Plan (MCCSP).

The Project site is located in the City of Ontario, within San Bernardino County, on approximately 56.52 acres comprising three parcels (Assessor Parcel Numbers [APNs] 1054-501-01, 1054-501-03, and 1054-511-001). The Project site is within the MCCSP, which provides for the development of Industrial and Business Park land uses on approximately 376.3 acres.

The Project site consists of Planning Area (PA) 6 (Industrial) and 6A (Business Park) and is generally bound by Eucalyptus Avenue to the north, Merrill Avenue to the south, Vineyard Avenue to the west, and Carpenter Avenue to the east. The proposed private electrical substation would be located entirely within the southern portion of PA 6, internal to the approved warehouse distribution site and outside public rights-of-way.

Regional access to the Project site includes State Route 83 (SR-83) to the west; SR-60 to the north, and Interstate 15 (I-15) to the east. From SR-83, access to the Project site is provided via Merrill Avenue, which is adjacent to the Project site. From SR-60, access to the Project site is provided via Archibald Avenue or Euclid Avenue. From I-15, access to the Project site is provided via Limonite Avenue or Ontario Ranch Road, which leads to Merrill Avenue via Archibald Avenue. Local access is also provided via Eucalyptus Avenue, Carpenter Avenue, Baker Avenue, Walker Avenue, and Hellman Avenue.

Table 1: Existing Land Uses (PA 6 & 6A) summarizes the on-site and surrounding land uses and corresponding zoning districts.

	Existing Land Use	Policy Plan Land Uses Designation	Zoning Designations/Overlays	Specific Plan Land Use Designations
Project Site (PA 6 & 6A)	Vacant	Industrial (0.55 FAR) / Business Park (0.60 FAR)	MCCSP / Chino Airport Overlay	Industrial / Business Park
North	Vacant	Medium Density Residential	Agricultural Overlay / Chino Airport Overlay	N/A
South	Warehouse (City of Chino)	Light Industrial (City of Chino)	Preserve Specific Plan (City of Chino)	Light Industrial (City of Chino)
East	Warehouse	Industrial (0.55 FAR)	West Ontario Commerce Center Specific Plan / Chino Airport Overlay	General Industrial
West	Fulfillment Center	Industrial (0.55 FAR) / Business Park (0.60 FAR)	MCCSP / Chino Airport Overlay	Industrial (PA 5) / Business Park (PA 5A)

2.2 Land Use Designations and Zoning

The Project site is located within the MCCSP, which establishes Industrial and Business Park land use designations and divides the plan area into 11 Planning Areas, each with defined development standards and maximum development capacity. The MCCSP allows a total of 8,455,000 square feet of industrial and business park development across the plan area.

As shown in **Table 2: Specific Plan Land Use Plan Statistical Summary**, Planning Area 6 is designated Industrial and allows up to 1,200,000 square feet of building area, while Planning Area 6A is designated Business Park and allows up to 248,000 square feet of building area. The approved warehouse distribution development, including refrigerated cold storage, truck maintenance garage, and accessory structures, remain within the maximum square footage and land use framework analyzed in the Certified EIR. The MCCSP expressly allows warehouse, distribution, and refrigerated cold storage uses, with up to 10 percent of the total Specific Plan buildout permitted for refrigerated cold storage uses. Electrical infrastructure necessary to serve these uses was contemplated at the Certified EIR. The proposed substation does not alter the underlying land use designations, increase development intensity, or introduce a new principal land use.

Table 2: Specific Plan Land Use Plan Statistical Summary

Planning Area	Land Use Designation	Acres ¹	FAR	Building Square Footage (SF) ^{2,3,4}
Industrial				
1	Industrial	58.9	0.55	1,411,000 SF
2	Industrial	62.1		1,488,000 SF
3	Industrial	30.7		735,000 SF
4	Industrial	31.1		745,000 SF
5	Industrial	59.9		1,435,000 SF
6	Industrial	50.1		1,200,000 SF
Total Industrial Acreage and Maximum Building SF		292.8	0.55	7,014,000 SF
Business Park				
1A	Business Park	22.9	0.60	598,000 SF
3A	Business Park	5.7		150,000 SF
4A	Business Park	5.8		152,000 SF
5A	Business Park	11.2		293,000 SF
6A	Business Park	9.5		248,000 SF
Total Business Park Acreage and Maximum Building SF		55.1	0.60	1,441,000 SF
--	<i>Circulation</i>	<i>28.4</i>	--	--
TOTALS		376.3 AC		8,455,000 SF

Notes:

1. Acreages are approximate and subject to survey verification.
2. Building square footage calculated by multiplying the total acreage of each planning area by the anticipated floor area ratio (FAR) for the respective land use designation (FAR of 0.55 is applicable to the Industrial land use designation, and FAR 0.60 is applicable to the Business Park land use designation).
3. Building square footage per planning area is approximate. The maximum building square footage indicated for each land use category (a maximum of 7,014,000 SF for Industrial and a maximum of 1,441,000 SF for Business Park) shall not be exceeded.
4. A maximum of 10% of the building square footage of the entire Specific Plan may be used for refrigerated warehousing and storage.

Source: Merrill Commerce Center Specific Plan, 2021.

2.3 Proposed Project Characteristics

Approved Warehouse Development

As approved by the City, the site includes development of an approximately 785,803-square-foot warehouse distribution facility, including approximately 700,000 square feet of refrigerated storage, a 41,923-square-foot truck maintenance garage, and approximately 9,872 square feet of ancillary structures, including guardhouses, a fire pump house, fuel island, and employee pavilion. The site maintains a floor area ratio (FAR) of approximately 0.34, with a maximum warehouse height of 110 feet, and provides required truck, trailer, and passenger vehicle parking consistent with City standards.

The warehouse distribution development, including its operational characteristics and the energy demand associated with refrigerated cold storage, was contemplated, analyzed, and disclosed in the Certified EIR and, as documented in the Substantial Conformance Determination, does not require further CEQA review.

Approval of a Conditional Use Permit for refrigerated cold storage is a discretionary land use action addressed separately by the City and does not authorize any land use, building area, operational characteristics, or intensity beyond the refrigerated warehouse use previously evaluated in the Certified EIR and determined to be in substantial conformance with the MCCSP through the City's Substantial Conformance Determination. The Conditional Use Permit serves solely to confirm the permissibility of refrigerated cold storage within the approved warehouse building and does not modify the scope, scale, or environmental assumptions of the approved project for purposes of CEQA.

Private On-Site Electrical Substation (Proposed Project)

The Proposed Project evaluated in this Addendum is limited exclusively to the construction and operation of a private on-site electrical substation required to provide permanent electrical service to the approved warehouse facility; see **Figure 1: Conceptual Site Plan**. This Addendum does not re-evaluate the approved warehouse development, refrigerated storage operations, or associated energy demand, all of which remain within the scope of the Certified EIR.

The substation is necessary because the facility's continuous electrical demand of approximately 30 megawatts (MW) exceeds the capacity of SCE's existing local distribution system.

The substation would occupy a secure, fenced area approximately 165 feet by 175 feet within the Project site and would include power transformers, 35-kV switchgear, circuit breakers, protective relays, and associated control equipment. The facility would receive 66-kV service from SCE and step down power for on-site distribution. The substation will be privately owned, constructed, and operated by the Project Applicant (or its successor in interest) and would interconnect with SCE's transmission system pursuant to an executed interconnection agreement. SCE will permit the substation, but will not own or operate the on-site substation equipment.

The substation is an accessory utility facility subordinate to and serving the approved industrial use. It does not introduce new electrical generation, fuel combustion, or energy demand, and does not change the operational characteristics of the warehouse facility.

Phased Power Implementation

To deliver permanent service, SCE requires installation of two new dedicated 66 kV feeders from an existing regional substation to the site. During the interim period, SCE would provide up to 15 MW of temporary ("bridging") power from the local distribution network to support construction activities and

limited operations. Once the permanent feeders are energized, the on-site substation would provide full electrical services sufficient to meet the facility's long-term operational demand.

Substation Function and Operation

The proposed private on-site electrical substation would operate automatically and continuously as the interface between the SCE regional transmission grid and the approved warehouse facility. The substation would receive electrical power at 66 kV and reduce voltage for on-site distribution through a system of power transformers, switchgear, circuit breakers, and protective relays. Power transformers would reduce incoming 66-kV service to approximately 35-kV for site-wide distribution, after which the power would be further stepped down through pad-mounted transformers serving individual building systems. Switchgear, circuit breakers, and protective relays would be direct, isolate, and protect electrical circuits, automatically interrupting power during fault conditions to ensure equipment protection and grid reliability.

The substation would be unmanned during normal operations and monitored remotely by facility engineers, with maintenance performed periodically in coordination with SCE. The facility would be designed and operated in compliance with applicable safety, fire, and building code requirements to ensure reliable and safe operation.

Architecture, Landscaping, and Lighting

All buildings on the site, including the substation enclosure, would exhibit a contemporary architectural style consistent with MCCSP Design Guidelines. The substation would be enclosed by architecturally compatible precast concrete walls and screened with landscaping to visually integrate the facility into the surrounding industrial development. Landscaping would include drought-tolerant plant materials and shade trees consistent with Specific Plan requirements. The Project would provide approximately 10.8 percent landscape coverage, exceeding the MCCSP minimum requirement of 10 percent.

Exterior lighting associated with the substation would be limited to low-mounted, motion-activated fixtures necessary for security and maintenance. All lighting would be shielded and directed downward in compliance with Specific Plan illumination standards, including the requirement that light levels not exceed one-quarter foot-candle at five feet from property lines.

Access, Circulation, and Parking

Vehicular access to the Project site would be provided via Vineyard Avenue and Carpenter Avenue, with internal circulation accommodated by on-site drive aisles previously approved as part of the warehouse distribution development. The overall site provides 435 passenger-vehicle parking spaces, 182 tractor parking stalls, 390 truck-trailer stalls, and 106 dock doors, consistent with or exceeding the requirements of the Ontario Development Code. The substation would be located within a secure, access-controlled yard and would not alter approved circulation patterns, access points, or parking supply. Access to the substation would be restricted to authorized personnel only.

All circulation, access, and parking facilities were previously analyzed in the Certified EIR and are unchanged by the proposed substation. The facility would comply with all applicable City fire and building code requirements and would maintain current one-line electrical diagrams, emergency shut-off procedures, and emergency contact information on file with the City Fire Department.

Pedestrian Facilities, Bike Lanes, and Transit

Existing pedestrian and bicycle facilities in the vicinity of the Project site are limited, with a pedestrian sidewalk currently provided along Merrill Avenue. Consistent with the MCCSP and previously approved

site development, the Project would construct frontage improvements including sidewalks, Class II bicycle lanes, and multi-purpose trails along Merrill Avenue, Carpenter Avenue, Eucalyptus Avenue, and Vineyard Avenue. These improvements were contemplated in the Certified EIR and are not modified by the proposed substation.

Infrastructure and Off-Site Improvements

Street improvements along Carpenter Avenue, Eucalyptus Avenue, and Vineyard Avenue adjacent to the Project site would be constructed in accordance with MCCSP Figure 4-1, Conceptual Vehicular Circulation and Access Plan, as part of the approved warehouse development.

Project implementation requires construction of on-site utility infrastructure to serve the approved industrial uses. In addition to standard water, sewer, storm-drain, and telecommunications improvements, the Project includes construction of the private on-site electrical substation evaluated in this Addendum. Permanent electrical service would be provided through two new dedicated 66-kV feeders extending from a nearby SCE regional substation to the Project site. Final engineering design, including trenching, conduit sizing, and equipment specifications, would be reviewed and approved by the City and SCE during the building permit plan check process.

Construction Activities

Construction of the overall warehouse facility is anticipated to occur over approximately 30 months. Construction of the private on-site electrical substation would occur concurrently with building improvements and would be coordinated with SCE's schedule for delivery of permanent high-voltage service. Temporary electrical power for construction and limited operations would be supplied through the existing distribution network until the substation is energized.

All construction activities would comply with the City's standard conditions of approval and all applicable mitigation measures identified in the Certified EIR.

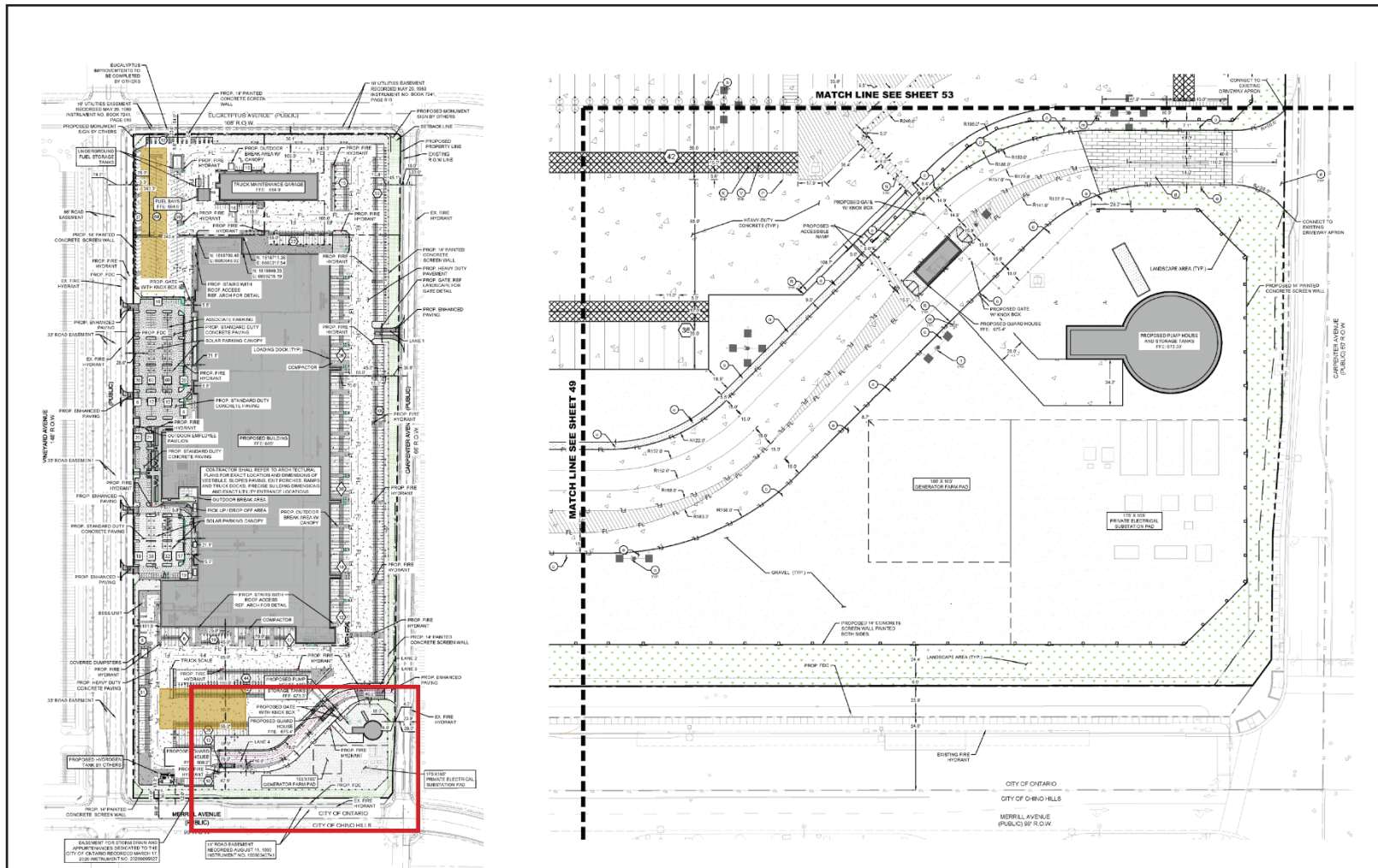
2.4 Required Project Approvals

The Project requires the following discretionary approvals and regulatory determinations:

- While not a discretionary approval itself, the Conditional Use Permit (listed below) cannot be considered by the City until its first adopts a CEQA Addendum to the certified Merrill Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2019049079) pursuant to State CEQA Guidelines Sections 15162 and 15164, evaluating the environmental effects associated solely with the construction and operation of a private on-site electrical substation required to serve the previously approved warehouse development.
- Conditional Use Permit (PCUP25-002) to allow operation refrigerated cold storage within the approved warehouse facility (previously analyzed in the Certified EIR), including the private on-site electrical substation.
- California Public Utilities Commission (CPUC) General Order 131-E Determination (Exemption from Permit to Construct)
 - Southern California Edison Company (SCE) is subject to the jurisdiction of the California Public Utilities Commission (CPUC) and must comply with applicable provisions of the California Public Utilities Code and CPUC General Orders. Construction of electrical facilities operating between 50 kilovolts (kV) and 200 kV, including a 66-kV substation and

associated 66-kV sub transmission facilities, is governed by CPUC General Order (GO) 131-E.

- Pursuant to GO 131-E, Section III.B.2, certain electrical facilities are exempt from the requirement to obtain a CPUC Permit to Construct (PTC) where the facilities are subject to environmental review under the California Environmental Quality Act (CEQA) by another Lead Agency and the environmental effects of the facilities have been adequately addressed. The private on-site electrical substation proposed as part of the Project qualifies for this exemption because it is subject to CEQA review by the City of Ontario and has been evaluated through the following environmental documents:
 - Merrill Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2019049079) (Applied Planning, 2020)
 - Project Lion Addendum to the Merrill Commerce Center Specific Plan Final Environmental Impact Report
- The Certified EIR evaluated industrial development within the MCCSP area, including large-scale warehouse distribution and refrigerated cold storage uses and the energy demands associated with those uses. This Addendum supplements the Certified EIR by evaluating the site-specific environmental effects associated solely with the construction and operation of a private on-site electrical substation required to provide permanent electrical service to an approved warehouse development.
- The proposed private on-site electrical substation is an accessory utility facility serving a permitted warehouse distribution and refrigerated cold storage uses, is consistent with the land use designations and development assumptions analyzed in the Certified EIR and does not constitute a new or independent land use. Accordingly, the environmental effects of the substation have been adequately addressed under CEQA, and the facility qualifies for an exemption from CPUC PTC requirements pursuant to GO 131-E.



Source: Kimley-Horn and Associates, 2026

FIGURE 1: CONCEPTUAL SITE PLAN
 PROJECT LION SUBSTATION



3. ENVIRONMENTAL IMPACT ANALYSIS

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000–21178.1) and the State CEQA Guidelines (Title 14, California Code of Regulations Sections 15000 et seq.), this Addendum evaluates whether the construction and operation of a private on-site electrical substation proposed to serve an already approved warehouse development within the Merrill Commerce Center Specific Plan (MCCSP), would result in new significant environmental effects or a substantial increase in the severity of impacts previously identified in the Certified EIR.

The scope of this Addendum is expressly limited to the substation component of the Project. All other elements of the warehouse development, including building size, land use, site design, circulation, refrigerated storage operations, and associated infrastructure, were previously evaluated and found to be consistent with the Certified EIR and the MCCSP under Development Plan File No. PDEV23-015 and subsequent City consistency determinations. Those components are not reconsidered or reanalyzed herein.

Each topical section below summarizes the applicable conclusions of the Certified EIR, evaluates the potential for new or more severe impacts attributable solely to the proposed substation, and determines whether additional environmental documentation is required pursuant to State CEQA Guidelines Section 15162. Where relevant, the analysis relies on the environmental setting, thresholds of significance, and mitigation measures adopted in the Certified EIR.

Readers are directed to the Certified EIR for a comprehensive discussion of baseline conditions, cumulative development assumptions, and impact analyses for development within the MCCSP area. This Addendum focuses solely on whether inclusion of the substation would result in new significant environmental effects, a substantial increase in the severity of previously identified effects, or the need for new or modified mitigation measures, consistent with State CEQA Guidelines Section 15162(a).

3.1 Land Use and Planning

Certified EIR Summary. The Certified EIR concluded that the MCCSP would not physically divide an existing community and would not conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. The Certified EIR evaluated the full range of industrial and business park uses permitted under the MCCSP, including high-cube warehouse distribution and refrigerated cold storage facilities, assuming buildout to the maximum development intensity allowed by the Specific Plan. As part of this analysis, the Certified EIR incorporated the MCCSP’s Dry Utilities Infrastructure Plan (Specific Plan Section 4.2.5), which identifies conceptual locations and corridors for electrical, telecommunications, and other dry utility infrastructure necessary to serve full buildout of the plan area. The Certified EIR assumed that dry utilities, including electric transmission and distribution facilities, would be installed, upgraded, and expanded as necessary to meet the energy demands of the permitted industrial uses, and that the precise configuration, alignment, and siting of such facilities would be determined through subsequent site-specific engineering, permitting, and development approvals.

The environmental effects associated with the installation, operation, and maintenance of dry utility infrastructure were evaluated in the Certified EIR to support approval of the MCCSP and the range of land

uses contemplated therein, with the understanding that project-level refinements would occur within the environmental envelope analyzed in the Certified EIR.³

Proposed Project Findings. The proposed private on-site electrical substation would occupy approximately 0.66 acres within Planning Area 6 of the MCCSP and would be located entirely within an area designated and zoned for industrial development. The substation is an accessory utility facility necessary to serve an approved industrial use and does not introduce a new land use, alter the approved land use pattern, or modify the physical arrangement of surrounding properties. Construction and operation of the substation would not physically divide an established community, nor would it interfere with adopted land use plans or policies.

The substation is consistent with the MCCSP land use framework and infrastructure planning assumptions. The MCCSP expressly contemplates development of large-scale industrial and warehouse uses supported by necessary infrastructure, including electrical facilities, as set forth in the Dry Utilities Infrastructure Plan (Specific Plan Section 4.2.5), which anticipates installation and expansion of electrical infrastructure as needed to serve full buildout of the Specific Plan area. It provides that infrastructure improvements necessary to support permitted industrial development would be implemented concurrently with or prior to development, subject to site-specific engineering and approvals. Consistent with these provisions, the Certified EIR evaluated the environmental effects of industrial and business park uses at maximum allowable buildout, including associated infrastructure demands, and assumed that electrical transmission and distribution facilities would be installed or upgraded as necessary to meet those demands.⁴ The Certified EIR specifically states that the Project Applicant would construct, or otherwise ensure to the satisfaction of the Lead Agency, those infrastructure improvements and service enhancements necessary to meet Project demands, and concluded that infrastructure and service demands generated by MCCSP development could be accommodated without conflict with applicable land use policies or adverse effects on surrounding land uses, provided required improvements were implemented.

Accordingly, the proposed private on-site electrical substation represents a site-specific utility refinement consistent with the land use assumptions, infrastructure framework, and environmental envelope analyzed in the Certified EIR. Its inclusion does not alter the conclusions of the Certified EIR regarding consistency with the City of Ontario Policy Plan or the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS).

Accordingly, the proposed substation would not result in new or more severe land use and planning impacts beyond those analyzed in the Certified EIR, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.2 Transportation

Certified EIR Summary. The Certified EIR determined that buildout of the MCCSP would not conflict with a program, plan, ordinance, or policy addressing the circulation system; would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and would not result in inadequate emergency access. Impacts related to vehicle miles traveled (VMT) associated with full MCCSP buildout were found to be significant and

³ Certified EIR, Section 4.1, Land Use and Planning, pp. 4.1-26–4.1-28; Section 4.12, Utilities and Service Systems; MCCSP Section 4.2.5.

⁴ Certified EIR Section 4.1, Land Use and Planning, pp. 4.1-26–4.1-28; Section 4.12, Utilities and Service Systems.

unavoidable despite implementation of Mitigation Measures 4.2.1 through 4.2.4 because the effectiveness of those measures would depend, in part, on final site designs and tenant occupancy patterns.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. As previously determined, the approved warehouse development, including its access points, truck circulation, parking supply, and operational trip generation, remains consistent with the Certified EIR and is not reevaluated herein.

The proposed private on-site electrical substation would occupy approximately 0.66 acres within the MCCSP and would function as a stationary utility facility providing electrical service to an approved warehouse distribution use. Substation construction would involve a limited number of workers, deliveries, and equipment trips over a short duration. These temporary activities would not materially affect roadway operations, intersection performance, or overall VMT levels beyond those already analyzed in the Certified EIR.

Once operational, the substation would be unmanned and would not generate daily vehicle trips, modify site access or circulation patterns, or alter designated truck routes established under the MCCSP. The substation would not increase land use intensity, change the approved site plan circulation framework, or affect emergency access.

Accordingly, the proposed substation would not result in new or more severe transportation impacts beyond those analyzed in the Certified EIR. No new mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162. Because the substation would generate de minimis trips and does not alter approved land use assumptions, it does not affect or modify the Certified EIR's significant and unavoidable VMT conclusion for MCCSP buildout.

3.3 Air Quality

Certified EIR Summary. The Certified EIR determined that implementation of the MCCSP at full buildout would generate regional air pollutant emissions exceeding South Coast Air Quality Management District (SCAQMD) thresholds and would conflict with the 2016 Air Quality Management Plan (AQMP), resulting in a significant and unavoidable impact. The Certified EIR also concluded that impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Air quality impacts associated with the construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated as part of the MCCSP Certified EIR and are not reexamined herein.

Construction of the substation would occur on approximately 0.66 acre within Planning Area 6 and would involve short-term, low-intensity activities, including minor grading, equipment installation, and limited truck deliveries. Construction-related emissions would be temporary and would be controlled through compliance with SCAQMD regulations, including Rules 403 (Fugitive Dust) and 1113 (Architectural Coatings). Given the small disturbance area, limited equipment use, and short construction duration, emissions would remain well below applicable regional and localized SCAQMD significance thresholds.

Operationally, the substation would be unmanned and would not involve combustion sources. Routine activities would be limited to periodic inspection and maintenance visits, which would generate negligible emissions. The substation would not emit objectionable odors or criteria pollutants regulated by

SCAQMD. The nearest sensitive receptors are located more than 2,300 feet from the substation site, and any emissions generated during construction or operation would be minimal and highly dispersed.

Accordingly, the proposed substation would not result in new or more severe air quality impacts beyond those analyzed in the Certified EIR. No mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.4 Greenhouse Gas Emissions

Certified EIR Summary. The Certified EIR determined that full buildout of the MCCSP would generate approximately 121,345.81 metric tons of carbon dioxide equivalent (MTCO₂e) per year, exceeding the SCAQMD's recommended screening threshold of 3,000 MTCO₂e per year. The Certified EIR further concluded that MCCSP buildout could conflict with applicable plans, policies, and regulations adopted to reduce greenhouse gas (GHG) emissions, resulting in a significant and unavoidable impact.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. GHG emissions associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

Construction of the private on-site electrical substation would occur on approximately 0.66 acres within the MCCSP and would involve short-term use of construction equipment and delivery vehicles over a limited period. Fuel consumption during construction would be minimal and would result in a negligible contribution to regional GHG emissions. Operationally, the substation would be unmanned and would consume only minimal electricity for safety lighting and automated controls. The substation would not create a new source of long-term GHG emissions or increase operational emissions beyond those associated with the previously approved industrial development. By providing direct high-voltage service from SCE's transmission system, the substation would improve electrical efficiency and reduce distribution losses relative to alternative interim supply configurations. The proposed substation would not conflict with State or local plans, policies, or regulations adopted to reduce GHG emissions, including the State's climate action framework and renewable energy mandates. The substation would not incrementally increase cumulative GHG emissions beyond the levels analyzed in the Certified EIR.

Accordingly, the proposed substation would not result in new or more severe GHG impacts beyond those analyzed in the Certified EIR. No mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.5 Noise

Certified EIR Summary. The Certified EIR determined that on-site construction noise associated with MCCSP buildout would result in less-than-significant impacts with implementation of Mitigation Measures 4.5.1 through 4.5.3. Construction of certain off-site infrastructure improvements was found to result in a significant and unavoidable temporary increase in ambient noise levels. The Certified EIR also concluded that impacts related to airport noise, groundborne vibration, and operational noise would be less than significant.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Noise impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

Construction of the substation would involve short-term, localized activities such as equipment installation, foundation work, and electrical component placement. These activities would be similar in nature and scale to other on-site utility construction evaluated in the Certified EIR. With implementation of Mitigation Measures 4.5.1 through 4.5.3, construction-related noise impacts would remain less than significant. The proposed substation would not require off-site infrastructure construction or roadway modifications that could contribute to the significant and unavoidable off-site noise impacts identified in the Certified EIR. Operationally, the substation would function as an unmanned, stationary utility facility containing transformers and switchgear that emit a continuous, low-level hum under normal operating conditions. Based on typical transformer specifications and site layout, operational noise levels would attenuate rapidly with distance and would be below the City's applicable noise standards at adjacent industrial property lines. Additionally, the nearest sensitive receptors are single-family residences located approximately 2,350 feet from the substation site, at which distance operational noise would be well below applicable daytime and nighttime residential noise standards. The substation would be enclosed within a walled and landscaped area, providing additional noise attenuation and shielding. The facility would not involve equipment capable of generating impulsive noise or groundborne vibration.

Accordingly, the proposed private on-site electrical substation would not result in new or more severe noise impacts beyond those analyzed in the Certified EIR. All applicable mitigation measures remain in effect, no new mitigation measures is required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.6 Hazards and Hazardous Materials

Certified EIR Summary. The Certified EIR determined that, with implementation of Mitigation Measures 4.6.1 through 4.6.9, development within the MCCSP would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. The Certified EIR also found that MCCSP development would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, that the MCCSP area is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and that potential airport-related safety hazards would be less than significant with implementation of Mitigation Measure 4.6.10.

Proposed Project Findings. The scope of this Addendum is limited to evaluation of the proposed private on-site electrical substation. Hazards and hazardous materials impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

Construction of the substation would involve limited use of common construction materials such as fuels, lubricants, and coatings. These materials would be handled, stored, and disposed of in accordance with applicable federal, State, and local regulations, including spill prevention and hazardous materials handling requirements. Operational activities would be limited to periodic inspection and maintenance and would not involve processes that generate hazardous emissions or waste.

The substation would not be located within one-quarter mile of an existing or proposed school and would not be located on or adjacent to a site listed pursuant to Government Code Section 65962.5. The substation would not involve combustion, chemical processing, or the storage of hazardous substances in quantities that could pose a risk to public or the environment. Compliance with Mitigation Measure 4.6.1 through 4.6.9 would remain in effect and would continue to ensure that previously unidentified hazardous conditions are properly addressed prior to construction.

The substation would remain subject to Mitigation Measure 4.6.10 to ensure continued compliance with the City of Ontario Chino Airport Compatibility Plan. Construction activities would be coordinated with the City and emergency service providers to avoid interference with emergency access or response routes.

Accordingly, the proposed private on-site electrical substation would not result in new or more severe hazards or hazardous materials impacts beyond those analyzed in the Certified EIR. All applicable mitigation measures remain in effect, no new mitigation is required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.7 Hydrology and Water Quality

Certified EIR Summary. The Certified EIR determined that implementation of the MCCSP would result in less than significant impacts related to hydrology and water quality. Future development within the MCCSP was assumed to comply with applicable federal, State, and local stormwater regulations, including the National Pollutant Discharge Elimination System (NPDES) requirements, and no mitigation measures were required.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Hydrology and water quality impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed private on-site electrical substation would occupy approximately 0.66 acres within the MCCSP and would not substantially alter existing drainage patterns or increase impervious surface area beyond what was previously analyzed in the Certified EIR. Construction activities would be temporary and would implement standard erosion and sediment control measures in compliance with the NPDES Construction General Permit.

The substation would be subject to the Municipal Separate Storm Sewer System (MS4) Permit, the Trash Mandate adopted by the Santa Ana Regional Water Quality Control Board (SARWQCB), and all applicable provisions of the County's NPDES permit. No waste materials would be discharged to drainage facilities or water bodies, and construction staging would avoid areas where materials could be mobilized by runoff.

The Project Applicant would be required to prepare and obtain City approval of a project-specific Water Quality Management Plan (WQMP) prior to the issuance of grading or building permits. The WQMP will identify and implement permanent source-control and treatment best management practices (BMPs) consistent with the City's Low Impact Development (LID) requirements and SARWQCB regulations. Implementation of the WQMPs and compliance with applicable NPDES and SARWQCB requirements will reduce potential operational-source water quality impacts to less-than-significant levels.

During operation, the substation would consist primarily of paved and graveled surfaces and would not introduce new sources of polluted runoff or substantially modify drainage conditions. Compliance with the approved WQMP and ongoing NPDES requirements would ensure that post-project runoff volumes, flow rates, and pollutant concentrations remain within the parameters evaluated in the Certified EIR.

Accordingly, the proposed substation would not result in new or more severe hydrology or water quality impacts beyond those analyzed in the Certified EIR. No new mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.8 Biological Resources

Certified EIR Summary. The Certified EIR determined that development within the MCCSP could result in impacts to biological resources; however with implementation of Mitigation Measures 4.8.1 through 4.8.5, potential impacts special-status species, nesting birds, and sensitive habitats would be reduced to less than significant levels.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Biological resource impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The substation would occupy approximately 0.66 acres within the MCCSP site that was evaluated in the Certified EIR. The area proposed for the substation is vacant, previously disturbed, and lacks native vegetation or habitat suitable for special-status plant or wildlife species. No riparian areas, wetlands, or sensitive natural communities occur within or adjacent to the substation footprint. Construction of the substation would remain subject to Mitigation Measures 4.8.1 through 4.8.5, including requirements for preconstruction surveys and avoidance of impacts to nesting birds or other protected species, if present. With implementation of these mitigation measures, construction and operation of the substation would not adversely affect biological resources.

Accordingly, the proposed substation would not result in new or more severe biological resources impacts beyond those analyzed in the Certified EIR. All applicable mitigation measures remain in effect, no new mitigation measures would be required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.9 Geology and Soils

Certified EIR Summary. The Certified EIR determined that geology and soils impacts associated with implementation of the MCCSP, including risks related to strong seismic ground shaking, seismic-related ground failure, liquefaction, lateral spreading, subsidence, and expansive soils, would be less than significant with implementation of Mitigation Measure 4.9.1. Mitigation Measure 4.9.1 requires preparation of project-specific geotechnical investigations and incorporation of recommended design and construction measures consistent with applicable State and local seismic safety standards. Other geology and soils related impacts, including rupture of a known earthquake fault, landslides, erosion, and use of alternative wastewater disposal systems, were also determined to be less than significant.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Geology and soils impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed on-site electrical substation would occupy approximately 0.66 acres within the MCCSP site and would not introduce new or more severe geologic or soil hazards beyond those analyzed in the Certified EIR. Construction of the substation would involve limited grading and shallow foundations typical of utility infrastructure. Consistent with Mitigation Measure 4.9.1, a project-specific geotechnical investigation would be prepared during final design to evaluate site-specific soil and seismic conditions and to identify appropriate foundation design, soil preparation, and construction recommendations in compliance with California Building Code and City requirements. The substation would not involve the use of septic systems or alternative wastewater disposal methods and would not substantially increase

erosion, loss of topsoil, or geologic instability. With the implementation of standard geotechnical recommendations and compliance with applicable codes and regulations, potential geology and soil impacts associated with the substation would remain less than significant.

Accordingly, the proposed substation would not result in new or more severe geology and soil impacts beyond those analyzed in the Certified EIR. All applicable mitigation measures remain in effect, no new mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.10 Cultural/Tribal Resources

Certified EIR Summary. The Certified EIR determined that buildout of the MCCSP would result in significant and unavoidable impacts related to a substantial adverse change in the significance of certain historical resources identified as potential Historic District Contributors (8731 Eucalyptus Avenue; 8831 Eucalyptus Avenue; 8888 Eucalyptus Avenue; 14651 S. Grove Avenue; and 8643 Eucalyptus Avenue). Impacts related to archaeological resources, tribal cultural resources, and paleontological resources were determined to be less than significant with implementation of Mitigation Measures 4.10.1 through 4.10.9.

Proposed Project Finding. The scope of this Addendum is limited to the proposed private on-site electrical substation. Cultural and tribal resource impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed on-site electrical substation would occupy approximately 0.66 acres within the MCCSP site evaluated in the Certified EIR. The area proposed for the substation does not contain any known historical resources and would not involve demolition or alteration of any structures identified as Historic District Contributors in the Certified EIR. Construction activities would involve limited ground disturbance typical of utility infrastructure. Consistent with the Certified EIR, construction of the substation would remain subject to Mitigation Measures 4.10.1 through 4.10.9, which require appropriate procedures for the identification, evaluation, and treatment of any previously unknown archaeological, tribal cultural, or paleontological resources encountered during grading or excavation. In the event that human remains are discovered, work would cease in the vicinity of the find and treatment would occur in accordance with California Health and Safety Code Sections 7050.5 through 7055 and Public Resources Code Sections 5097.98 and 5097.99.

Accordingly, the proposed substation would not result in new or more severe cultural/tribal resource impacts beyond those analyzed in the Certified EIR. All applicable mitigation measures remain in effect, no new mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.11 Agricultural Resources

Certified EIR Summary. The Certified EIR determined that buildout of the MCCSP would result in a significant and unavoidable impact related to the conversion of farmland to urban uses. These impacts were fully analyzed and disclosed and were found to be consistent with and not exceed farmland conversion impacts addressed in prior General Plan and infrastructure documents. The Certified EIR also concluded that the MCCSP would not conflict with Williamson Act contracts and that no forest land or timberland resources occur within the MCCSP area.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Agricultural resource impacts associated with development of the approved

warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed private on-site electrical substation would occupy approximately 0.66 acres within an area designated and zoned for urban industrial development under the MCCSP. The site is fully disturbed, not under active agricultural use, and not subject to a Williamson Act contract. Construction and operation of the substation would not convert agricultural land, extend infrastructure into agricultural areas, or induce additional farmland conversion beyond that previously analyzed.

Accordingly, while farmland conversion was identified in the Certified EIR as a significant and unavoidable cumulative impact of MCCSP buildout, the proposed substation would not result in new or more severe agricultural resource impacts. No new mitigation measures are required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.12 Utilities and Service Systems

Certified EIR Summary. The Certified EIR determined that implementation of the MCCSP would result in no impact or less-than-significant impacts concerning utilities and service systems. The analysis concluded that adequate water, wastewater, storm-drainage, solid-waste, and energy infrastructure and service capacity were available or planned to support the buildout of the MCCSP, and that utilities and service systems impacts would be less than significant.

As described in Certified EIR Section 4.12, evaluated utilities and service systems impacts were based on likely maximum development scenarios, assuming buildout of the Specific Plan at the maximum intensity permitted under the Industrial and Business Park land use designations. The analysis assumed that utilities and service systems distribution and conveyance facilities would be constructed, extended, upgraded, or refined as necessary to support incremental development, consistent with City Infrastructure Master Plans and applicable planning documents. The Certified EIR further assumed that utilities and service systems facilities would generally be located within existing improved streets or otherwise disturbed areas and constructed in accordance with City standards and utility purveyor requirements, thereby avoiding or minimizing environmental impacts.

With respect to dry utilities, the Certified EIR acknowledged that electric power, natural gas, telecommunications, and fiber-optic services were generally available to the MCCSP area and surrounding portions of Ontario Ranch, provided by existing utility purveyors including Southern California Edison, Southern California Gas Company, private telecommunications providers, and the City of Ontario fiber optic system. The Certified EIR stated that the MCCSP did not propose dry utilities generation, storage, or supply facilities, the construction or relocation of which could result in potentially significant environmental effects. Rather, the analysis assumed that dry utility infrastructure, including electric and natural gas lines, would connect to existing utility systems serving the area.

The Certified EIR further anticipated that the specific locations, configurations, and design of utility connections, transformers, switches, and related dry utility facilities internal to the Specific Plan area would be determined during final project design and engineering, subject to approval by the City Engineer and applicable utility purveyors. Consistent with this framework, the Certified EIR assumed that refinements or modifications to utility infrastructure necessary to ensure adequate service to permitted development would occur as part of implementation of the MCCSP and would not result in new or more severe environmental impacts.

The Certified EIR also assumed that each increment of development under the MCCSP would be required to pay applicable utilities and service system connection and service fees, which would fund ongoing

infrastructure improvements, operations, and maintenance. Utilities and service system improvements would be implemented to provide adequate service and capacity for each increment of development, and the City would verify service and capacity adequacy prior to issuance of Certificates of Occupancy. The timing and manner in which utilities and service systems facilities are constructed, upgraded, or refined would be determined by the City in consultation with affected utility purveyors and service providers to address incremental and cumulative demands associated with MCCSP buildout.

Finally, the Certified EIR assumed that development under the MCCSP would comply with applicable federal, State, and local requirements related to water conservation, solid waste diversion, and energy efficiency. Based on these assumptions and analyses, the Certified EIR concluded that utilities and service systems impacts would be less than significant and that no mitigation measures were required.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Utilities and service system impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed private on-site electrical substation would not result in new or more severe utilities or service systems impacts than those analyzed in the Certified EIR. The Certified EIR evaluated utilities and service systems impacts for buildout of the MCCSP at the maximum development intensity permitted under the Industrial and Business Park land use designations, including the approved industrial use, and concluded that adequate water, wastewater, storm drainage, solid waste, and energy infrastructure and service capacity were available or planned to support full buildout of the Specific Plan. The Certified EIR further evaluated the impacts of utilities and service systems, assuming that distribution and conveyance facilities would be constructed, extended, upgraded, or refined as necessary to provide adequate service for each increment of development, consistent with adopted City Infrastructure Master Plans, applicable utility planning documents, and City and utility purveyor standards.

Regarding dry utilities, the Certified EIR acknowledged that electric power, natural gas, telecommunications, and fiber-optic services are generally available in the MCCSP area and are provided by existing utility providers. The Certified EIR stated that the MCCSP did not propose dry-utility generation, storage, or supply facilities and assumed that dry-utility infrastructure would connect to existing utility systems serving the area. The Certified EIR further anticipated that dry utilities within the Specific Plan area would be installed underground, and that the specific locations and configurations of utility connections, transformers, switches, and related facilities would be determined during final project design and engineering, subject to approval by the City Engineer and applicable utility purveyors.

The proposed private on-site electrical substation is consistent with these assumptions. The substation would function as an accessory utility serving development already contemplated under the MCCSP and approved by the City and would not alter the land use assumptions, development intensity, or operational characteristics evaluated in the Certified EIR. The substation does not authorize additional development, increase electrical demand beyond that assumed for MCCSP buildout, or result in increased energy consumption beyond what was evaluated in the Certified EIR. Rather, it represents a site-specific refinement of utility infrastructure within the scope of the Dry Utilities Infrastructure Plan and the utilities and energy analyses evaluated in the Certified EIR. The increased electrical capacity facilitated by the substation relates to the delivery and reliability of service and would not result in increased production of electric power to serve the approved refrigerated warehouse use.

Consistent with the Certified EIR, each increment of development under the MCCSP, including development served by the proposed substation, would be required to pay applicable utilities and service

system connection and service fees. Utilities and service system improvements would be implemented to provide adequate service and capacity for the approved industrial use, and the City would verify service and capacity adequacy prior to issuance of Certificates of Occupancy. The timing and manner in which utilities and service systems facilities are constructed, upgraded, or refined would be determined by the City in consultation with affected utility purveyors and service providers.

The proposed private on-site electrical substation would occupy approximately 0.66 acres within the MCCSP and would function solely as an accessory utility facility to deliver electrical power to the approved industrial use. Construction and operation of the substation would not generate wastewater, require potable water service, or necessitate expansion of wastewater, storm-drainage, or solid waste infrastructure. Construction activities would be limited in scope and duration and would not demand substantial utility services. The substation would be unmanned and would not require sanitary sewer, natural gas, or water service. Stormwater runoff from the substation would be managed in accordance with the Project's approved Water Quality Management Plan, applicable NPDES permits, and City requirements. Solid waste generated during construction would be handled and disposed of in compliance with applicable regulations, including Assembly Bill 939 diversion requirements.

Electrical service would be provided through coordination with SCE pursuant to an approved interconnection agreement. While the substation is required to reliably serve the electrical needs of the approved refrigerated warehouse, that electrical demand was contemplated and analyzed as part of MCCSP buildout in the Certified EIR. The substation does not represent an increase in electrical demand beyond that previously analyzed, but rather a modification to the method of electrical delivery consistent with the Certified EIR's infrastructure assumptions.

Accordingly, the proposed private on-site electrical substation would not result in new or more severe utilities and service systems impacts beyond those analyzed in the Certified EIR. No new mitigation measures would be required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.

3.13 Energy

Certified EIR Summary. The Certified EIR determined that energy impacts associated with buildout of the MCCSP would be less than significant. The analysis concluded that development under the MCCSP would not result in inefficient, wasteful, or unnecessary consumption of energy resources during construction or operation and would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The Certified EIR assumed development of large-scale industrial and refrigerated warehouse uses and evaluated energy demand at a worst-case level.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Energy impacts associated with construction and operation of the approved warehouse and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

Construction of the proposed substation would involve limited, short-term use of fuel associated with construction equipment and construction-related vehicle trips. This temporary energy use would be minor, typical of utility infrastructure construction, and would not constitute inefficient, wasteful, or unnecessary consumption of energy resources. Once operational, the substation would function as an unmanned utility facility and would consume only minimal electricity for safety lighting, monitoring, and automated controls. The substation would not require natural gas service and would not introduce new ongoing energy demands.

Importantly, the proposed substation would not increase the electrical demand of the Project beyond what was contemplated in the Certified EIR. The approved refrigerated warehouse and its associated electrical demand was assumed as part of MCCSP buildout and evaluated in the Certified EIR's energy analysis. The substation does not expand the size, intensity, or operational characteristics of the warehouse, nor does it enable additional energy-consuming uses.

The increase in electrical capacity facilitated by the substation relates solely to the ability to reliably deliver electricity that was already assumed to be required under the MCCSP buildout scenario. The substation does not increase the amount of electricity consumed by the warehouse and does not result in increased production of electric power attributable to the Project. Decisions regarding electric power generation occur at the regional grid level and are independent of the Project; the substation merely modifies the method of electrical delivery to serve an already-approved demand. In this respect, the substation addresses a delivery and reliability constraint rather than creating new or increased energy consumption.

By improving the efficiency and reliability of electricity delivery, the substation may reduce line losses associated with serving the approved use, but it does not alter the Project's total energy demand. The Project would continue to comply with applicable provisions of the California Building Energy Efficiency Standards (Title 24, Part 6), the California Green Building Standards Code (CALGreen, Title 24, Part 11), and the City's adopted energy-efficiency requirements. The substation would not conflict with or obstruct implementation of any State or local plan for renewable energy or energy efficiency, including the 2022 Scoping Plan, SB 100 renewable-energy goals, or SCE's Renewable Portfolio Standard obligations.

Accordingly, the proposed private on-site electrical substation would not result in an increase in electric power production to serve the approved warehouse, would not cause inefficient, wasteful, or unnecessary consumption of energy resources and would not create new or more severe energy impacts beyond those analyzed in the Certified EIR. No new mitigation measures are required, and no further environmental documentation is necessary pursuant to State CEQA Guidelines Section 15162.

3.14 Population and Housing

Certified EIR Summary. The Certified EIR determined that implementation of the MCCSP would not result in substantial unplanned population growth or displacement of substantial numbers of people or housing units. Accordingly, impacts related to population growth inducement and housing displacement were found to be less than significant.

Proposed Project Findings. The scope of this Addendum is limited to the proposed private on-site electrical substation. Population and housing impacts associated with construction and operation of the approved warehouse distribution and refrigerated cold-storage facility were previously evaluated in the Certified EIR and are not reexamined herein.

The proposed substation would function as an unmanned utility facility and would not generate new employment, housing demand, or population growth. Construction would be short-term and would not induce permanent or temporary population increases or displacement of housing. The Project would not require demolition of existing residences or affect housing availability in the City or region.

Accordingly, the proposed substation would not result in new or more severe population and housing impacts beyond those analyzed in the Certified EIR. No new mitigation measures would be required, and no further environmental documentation is required pursuant to State CEQA Guidelines Section 15162.