

DRAFT
Lilac Avenue and Santa Ana Avenue Warehouse Project
Initial Study/Mitigated Negative Declaration
City of Rialto, San Bernardino County, California

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Report Date: June 14, 2023

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ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
AB	Assembly Bill
AC	Asphaltic Concrete
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AF	acre-feet
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
ARB	California Air Resources Board
AST	aboveground storage tank
ASTM	American Society of Testing and Materials
BCC	Bird of Conservation Concern
BERD	California Built Environment Resource Directory
BIOS 5	Biogeographic Information and Observation System
BMP	Best Management Practice
BRA	Biological Resources Assessment
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CalGreen	California Green Building Standards Code
CalRecycle	California's Department of Resource Recycling and Recovery
Caltrans	California Department of Transportation
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHL	California Historic Landmarks
CJUSD	Colton Joint Unified School District
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPSEI	California Native Plant Society Electronic Inventory
CPHI	California Points of Historic Interest
CRHR	California Register of Historical Resources

Acronyms and Abbreviations

dB	decibel
dBA	A-weighted decibel
DCV	design capture volume
DIF	Development Impact Fee
DPR	California Department of Parks and Recreation
EAP	Existing Plus Ambient Growth Plus Project
EAPC	Existing Plus Ambient Growth Plus Project Plus Cumulative
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EV	electric vehicle
EVA	Emergency Vehicle Access
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
FWC	Fontana Water Company
HAULERS	Registered Waste Tire Haulers Listing
HAZNET	Facility and Manifest Data
HCP	Habitat Conservation Plan
HWTS	Hazardous Waste Tracking System
IPaC	Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineering
IUWMP	Integrated Urban Water Management Plan
LBP	Lead-Based Paint
L _{dn}	day/night sound level
L _{eq}	equivalent continuous sound level
LOS	level of service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	Most Likely Descendant
mph	miles per hour
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	Negative Declaration

NHM	Natural History Museum of Los Angeles County
NOI	Notice of Intent
NonGen/NLR	RCRA Former Hazardous Waste Generators/No Longer Regulated Sites
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PA	Production/Attraction
PCC	Portland Cement Concrete
PCE	Passenger Car Equivalent
PPV	peak particle velocity
PRS	Paleontological Records Search
PWQMP	Preliminary Water Quality Management Plan
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
SBCM	San Bernardino County Museum
SBCTA	San Bernardino County Transportation Authority
SBTAM	San Bernardino Transportation Analysis Model
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SED	socioeconomic data
SoCalGas	Southern California Gas Company
SoCalGeo	Southern California Geotechnical
SRA	State Responsibility Area
SSC	Special Species of Concern
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
TA	Traffic Analysis
TAZ	Traffic Analysis Zone
TCR	Tribal Cultural Resource
TPA	Transit Priority Area
UCMP	University of California Museum of Paleontology
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds

WEAP	Worker Environmental Awareness Program
WQMP	Water Quality Management Plan
WVWD	West Valley Water District

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the Lilac Avenue and Santa Ana Avenue Warehouse Project (proposed project) in the City of Rialto, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Rialto has discretionary authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the project.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response. Feasible mitigations are analyzed to reduce all impacts to below a level of significance. References cited in this Draft IS/MND are included in Section 3, and Section 4 contains the List of Preparers.

1.2 - Project Location

The approximately 13.68-acre project site is located within the City of Rialto (City) in San Bernardino County (County), California (Exhibit 1). The City is surrounded by the City San Bernardino to the north, Muscoy (a census-designated place in San Bernardino County) and the City of San Bernardino to the east, portions of the cities of Bloomington, Colton, Riverside, and Grand Terrace to the south, and the City of Fontana to the west. Regional access to the site is provided via Interstate 10 (I-10) at the South Riverside Avenue exit. Local access to the site is provided via Lilac Avenue and Santa Ana Avenue.

The project site is located at 2678 Lilac Avenue, west of Lilac Avenue and south of Santa Ana Avenue, and comprises five parcels associated with Assessor's Parcel Numbers (APNs) 0258-102-58-0000, -59, -60, -61, and -68. The project site is located within the *San Bernardino South, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map.

1.3 - Environmental Setting

The project site is surrounded by Santa Ana Avenue and existing logistics operations to the north, Lilac Avenue and existing logistics operations to the east, a vacant lot to the south, and residential development to the west (Exhibit 2). The southern portion of the site located on APN 0258-102-58-0068 is currently developed with a paved truck and trailer parking lot and three associated structures, consisting of an office building, maintenance building, and storage building.^{1,2} The existing truck and trailer operation is surrounded by an approximately 10 foot high masonry block wall along eastern and western property lines and by chainlink fencing along the northern and

¹ Southern California Geotechnical (SoCalGeo). 2022. Geotechnical Investigation. June.

² The Vertex Companies, LLC (VERTEX). 2022. Phase I Environmental Site Assessment. May 9, 2022.

southern property lines.³ The northern undeveloped parcels consisting of APNs 0258-102-58-0000, -59, -60, and -61 contain disturbed land with no structures or fencing. A concrete drainage channel is located at the southern boundary of the project site. The site is currently served by a septic system. Wastewater discharges are directed to septic systems that are connected to office and storage buildings on the site. All five parcels are designated as Light Industrial according to the Rialto General Plan (General Plan)⁴ (Exhibit 3), and zoned as Light Industrial (M-1) according to the Rialto Zoning Map (Exhibit 4).⁵ The Light Industrial land use designation allows for light industrial activity such as processing, packaging, machinery repair, fabrication, distribution, warehousing and storage, research and development, and similar uses which are low impact.⁶ According to the Rialto Municipal Code (Municipal Code), the M-1 zone permits light manufacturing, processing, or treatment of products, as well as specific uses such as lumber yards, truck terminals, and hauling and storage yards, among others.⁷

The General Plan land use designations for the properties surrounding the site include the following:

- North: General Industrial
- South: Light Industrial, Residential 2 (San Bernardino County)
- East: Light Industrial with Agua Mansa Industrial Corridor Specific Plan Overlay
- West: Residential 2 (San Bernardino County)

1.4 - Project Description

Seefried Industrial Properties, Inc., proposes to demolish the three existing structures and paved parking lot and develop an approximately 301,000-square-foot building that would include approximately 297,500 square feet of warehouse uses,⁸ an approximately 3,500-square-foot office/mezzanine and associated paved parking lot (Exhibit 5). The proposed project would include 35 dock-high doors.

1.4.1 - Site Access and Circulation

The proposed project would include 180 automobile stalls (including six Americans with Disabilities Act [ADA] stalls, 18 electric vehicle [EV] stalls) and 48 trailer stalls. Trailer stalls would be located east of the building along Lilac Avenue, and standard parking stalls would be located throughout the site to the east, north and south of the building. Access to the site would be provided via one 40-foot-wide driveway and one 26-foot-wide driveway along Santa Ana Avenue and one 40-foot-wide driveway along Lilac Avenue. Driveway 1 along Santa Ana Avenue (closest to the residential development to the west of the site) would be for passenger car access only. Driveway 2 along Santa

³ The Vertex Companies, LLC (VERTEX). 2022. Phase I Environmental Site Assessment. May 9, 2022.

⁴ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed June 29, 2022.

⁵ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map---July-2013>. Accessed June 29, 2022.

⁶ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed June 29, 2022.

⁷ City of Rialto. Rialto Municipal Code. 2022. Light Manufacturing Zone. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.38LIMAZO. Accessed June 29, 2022.

⁸ Cold storage is not proposed as part of the project.

Ana Avenue (closest to Lilac Avenue) and the driveway along Lilac Avenue would allow for passenger car and truck access. Regional access to the site is provided via I-10 at the South Riverside Avenue exit. Local access to the site is provided via Lilac Avenue, Santa Ana Avenue, and South Cactus Avenue.

1.4.2 - Off-site Improvements

The proposed project would include approximately 1.5 acres of off-site improvements (Exhibit 6). The project applicant proposes to construct two commercial driveways on Santa Ana Avenue, one commercial driveway on Lilac Avenue, and approximately 8,250 square feet of sidewalk and 7,300 square feet landscape improvements along the project frontages. One existing driveway on Lilac Avenue would be removed, and curb and gutter would be replaced along the entire project frontages (Lilac Avenue and Santa Ana Avenue). Paving, curb, and gutter improvements would total approximately 49,790 square feet.

The site is currently served by an existing water service, fire service, and irrigation service. The existing service lines would be removed and new improvements for service would be constructed to tie into the existing infrastructure. On Santa Ana Avenue, one 10-inch fire water service, one 3-inch domestic service, and one 2-inch irrigation service would be extended to the property line from the water main. On Lilac Avenue, one 10-inch fire service line extended from the main and one 6-inch sewer lateral would be constructed extending from the main to the project site. Public fire hydrants would be provided on both project frontages to adhere to City spacing requirements.⁹ Above ground utilities within the public rights-of-way would be undergrounded per the City Municipal Code.¹⁰

1.4.3 - Fencing

The proposed project would include a 14-foot-high screen wall surrounding the trailer parking area at the eastern portion of the site. An existing retaining wall at the western property line will remain.

1.4.4 - Design and Appearance

The proposed warehouse building would be concrete tilt-up panel construction with a wood roof deck over steel bar joist. Entrances would be covered with aluminum entry canopies. The building would be designed for a 36-foot interior height at the perimeter walls with the typical height of approximately 42 feet and a maximum height of 45 feet.

1.4.5 - Landscaping

The proposed project would include approximately 74,000 square feet of landscaping around the perimeter of the site and throughout the parking areas. Landscaping would include a mix of low water and medium water ground cover, grasses and shrubs including green beauty boxwood (*Buxus microphylla japonica*), Texas privet (*Ligustrum teanum*), heavenly bamboo (*Nandina domestica*), fern pine (*Podocarpus gracilior*), Indian hawthorne (*Rhaphiolepis indica*), shiny xylosma (*Xylosma congestum*), purple threeawn (*Aristida purpurea purpurea*), pink muhly (*Muhlenbergia capillaris*),

⁹ City of Rialto requires one public fire hydrant per 300 linear feet of project frontage.

¹⁰ City of Rialto. 2022. Title 15, Chapter 15.32, Underground Utilities. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.32UNUT. Accessed July 19, 2022.

Lindheimer's muhly (*Muhlenbergia lindheimeri*), fountain grass (*Pennisetum*), lemon bottlebrush shrub (*Callistemon citrinus*), purple leafed hopseed bush (*Dodonaea viscosa*), silverberry (*Eleagnus pungens*), rosenka bougainvillea (*Bougainvillea*), dwarf bottle brush (*Callistemon citrinus*), little ollie olive (*Olea europaea*), coast rosemary (*Westringia fruticosa*), blue flame agave (*Agave*), agave variegated (*Agave desmettiana*), Tuscan blue rosemary (*Rosmarinus officinalis*), Cleveland sage (*Salvia clevelandii*) and Furman's red salvia (*Salvia greggii*). Landscaped trees include shoestring acacia (*Acacia stenophylla*), Chinese flame tree (*Koelreuteria bipinnata*), Afghan pine (*Pinus eldarica*), lavender crape myrtle (*Lagerstroemia*), aristocrat flowering pear (*Pyrus calleryana*), southern live oak (*Quercus virginiana*), African sumac (*Rhus lancea*), and Brisbane box (*Tristania conferta*) (Exhibit 7). The proposed project would employ a low flow irrigation system to ensure that water efficiency would meet or surpass the current State-mandated Assembly Bill (AB) 1881 Water Efficient Landscape Ordinance, which is included in the Municipal Code under 12.50.060, Water Efficient Landscape Requirements.¹¹

1.4.6 - Lighting

The proposed project would operate 24 hours a day, 7 days a week as a warehouse facility; thus, lighting would be designed to maximize employee safety and security while complying with City standards to address adjacency issues.

Standard Conditions

Standard Conditions, as required by the California Green Building Standards Code (CalGreen), are identified throughout this document and applied where appropriate.

1.4.7 - Utilities

The project site is currently, and would continue to be, served by the following utility providers:

- Electricity: Southern California Edison (SCE)
- Natural Gas: Southern California Gas Company (SoCalGas)
- Sewage: Rialto Water Services
- Potable Water: West Valley Water District (WVWD)
- Solid Waste Removal: Burrtec Waste Disposal
- Telecommunications: AT&T

1.4.8 - Storm Drainage

The proposed project would include the construction of an on-site storm drain system consisting of ribbon gutters, catch basin inlets, and underground pipes. Runoff would be directed toward an underground infiltration basin located within the drive aisle around the site. Stormwater quality low-flows from the site are expected to be retained and infiltrated into the native soil while the excess overflow would be released toward Lilac Avenue and the southerly drainage channel. In terms of drainage and stormwater quality, the proposed project would be designed to conform to the

¹¹ City of Rialto. 2022. Rialto Municipal Code. Water Efficient Landscape Requirements. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT12PUUT_DIV2NOWACOTR_CH12.50WAEFLARE_12.50.060WAEFLARE. Accessed June 29, 2022.

requirements of the San Bernardino County Hydrology Manual, and Santa Ana Regional Water Quality Control Board (Santa Ana RWQCB) Order No. R8-2002-0012 (National Pollutant Discharge Elimination System [NPDES] Permit No. CAS618036) and relevant design would be documented in technical report formats (i.e., Water Quality Management Plan [WQMP] and Drainage Report).

1.4.9 - Wastewater

The project site is currently served by an existing septic system. Wastewater discharges are directed to septic systems that are connected to the office and storage buildings on the site. The project site would be served by a public sanitary sewer located in Santa Ana Avenue; an existing sewer main is accessible for discharge. Flows from the project site would be collected by an on-site gravity sewer line that would discharge into an on-site, private sewer lift station. Wastewater would be pumped to ultimately discharge to the existing public sanitary sewer line in Santa Ana Avenue. An additional public sanitary sewer is located in Lilac Avenue; however, this sewer main is non-operational. Therefore, wastewater would discharge to the existing line located in Santa Ana Avenue.

1.4.10 - Phasing and Construction

The proposed project would include demolition of the three existing buildings and associated parking areas. Construction of the proposed project and off-site roadway improvements is estimated to start in summer of 2023; demolition and construction would be completed in one phase that is estimated to begin in summer 2023 and conclude in summer of 2024. The proposed project is expected to be operational in the fourth quarter of 2024.

1.4.11 - Operation and Employment

The hours of operation for the proposed project would be 24 hours a day, 7 days a week. Operational activities within the project site would comply with the permitted uses of the Light Industrial designation and Light Manufacturing zone, as described in the General Plan and Municipal Code (see Section 1.3 above). The proposed project would employ approximately 252 employees on-site.

The operational fleet mix used to assess emissions from the proposed project is shown below in Table 1. As a project design feature, heavy-duty trucks would be model year 2010 and newer.

Table 1: Vehicle Type Classification

Vehicle Type	Sample Fleet Mix (Percentage of Total Fleet Mix)
Passenger Vehicle	60.0%
2-Axle	0.8%
3-Axle	11.2%
4-Axle	28.0%
Source: Urban Crossroads, Inc 2023	

1.5 - Required Discretionary Approvals

As mentioned previously, the City of Rialto has discretionary authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. In order to implement the proposed project, the City would need to secure the following permits/approvals:

- Approval of the IS/MND
- Lot merger
- Precise Plan of Design
- Grading and Building permits
- Conditional Development Permit

1.6 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

Daniel Casey, Senior Planner
Planning Division
150 South Palm Avenue
Rialto, CA 92376
909.820.2535
dcasey@rialto.ca.gov



Source: Census 2000 Data, The California Information Library (CaSIL).

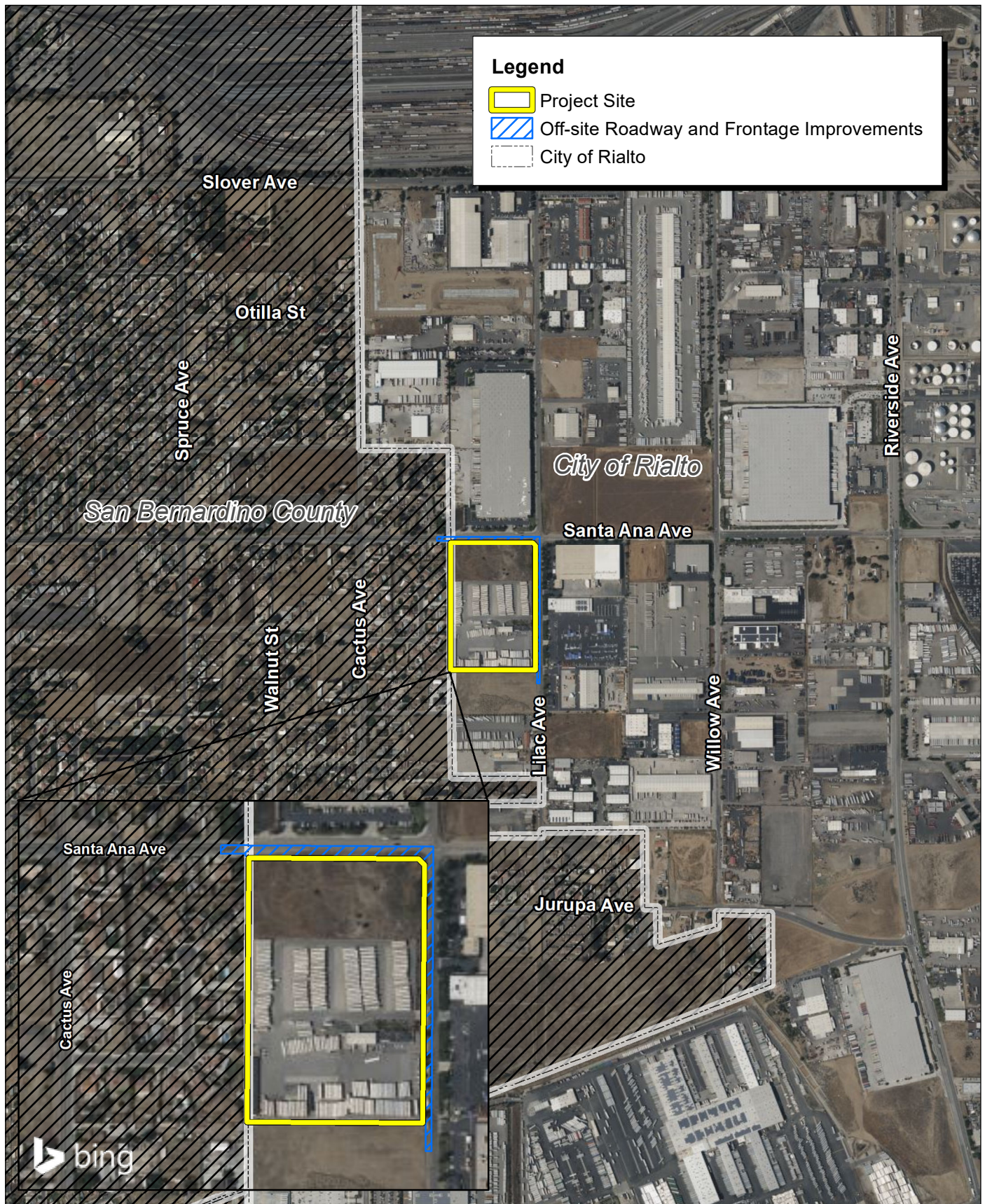
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Exhibit 1 Regional Location Map

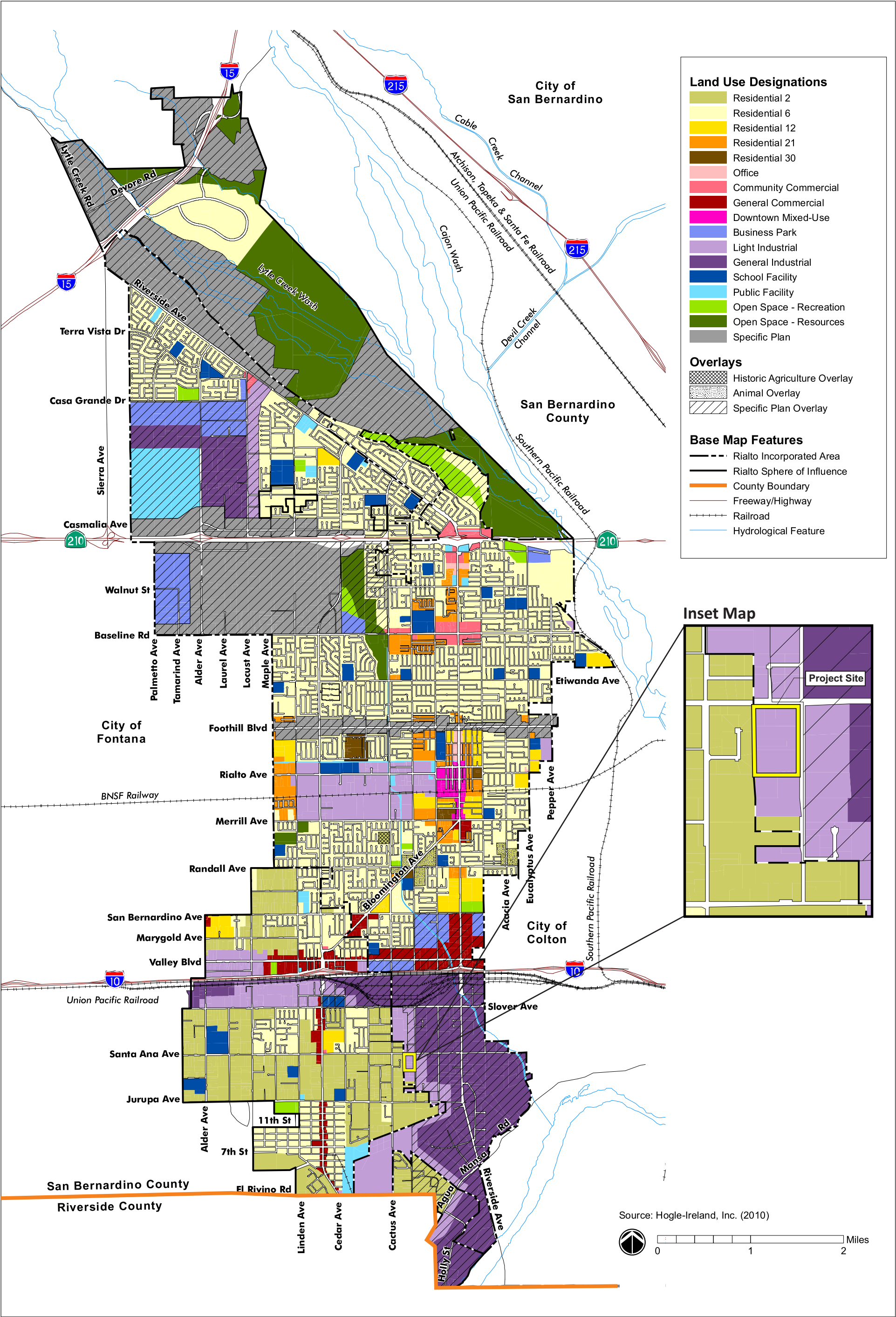
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Source: Bing Aerial Imagery. Kimley-Horn 7/13/2022.

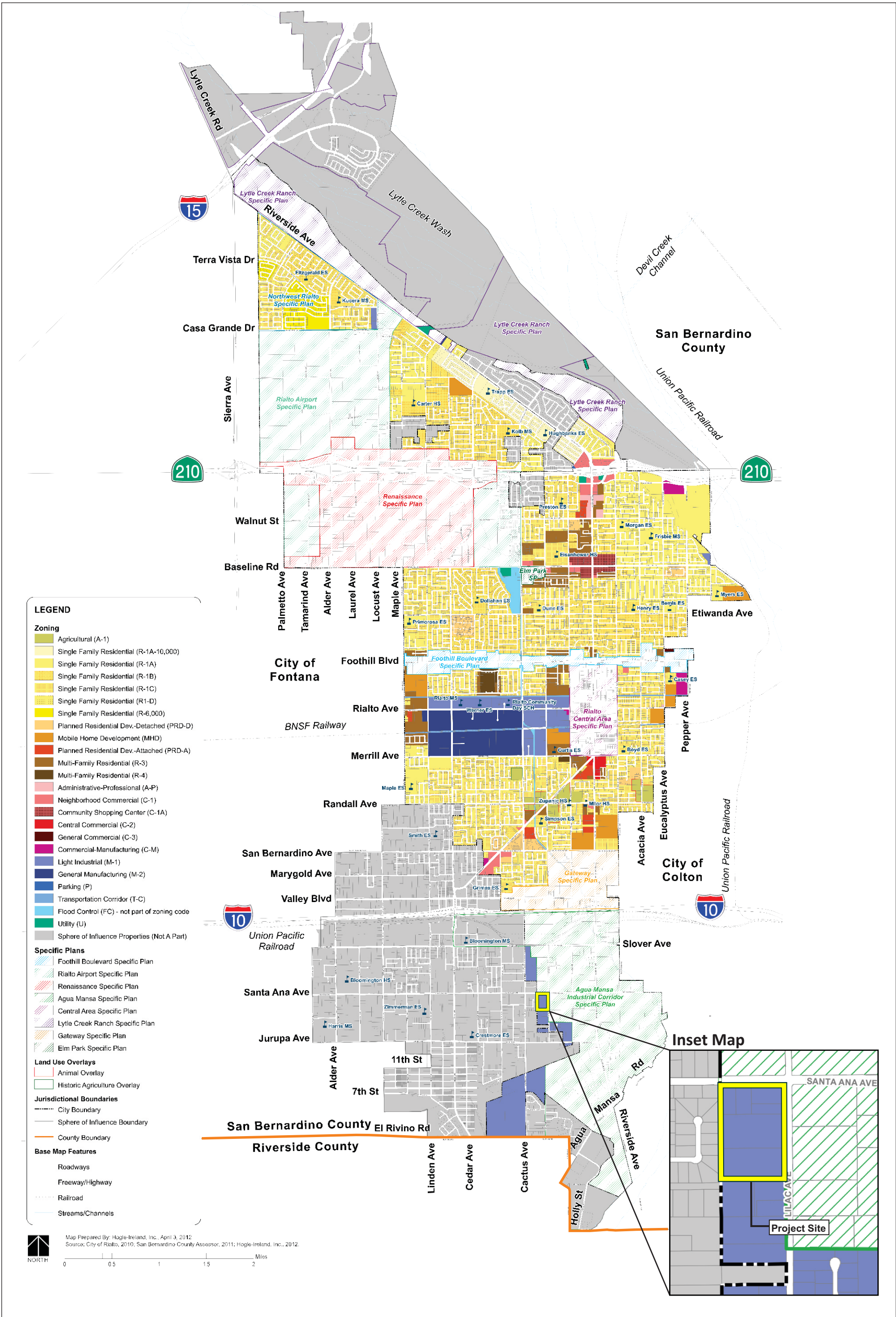


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Source: Rialto General Plan. Hogle-Ireland, Inc. (2010).

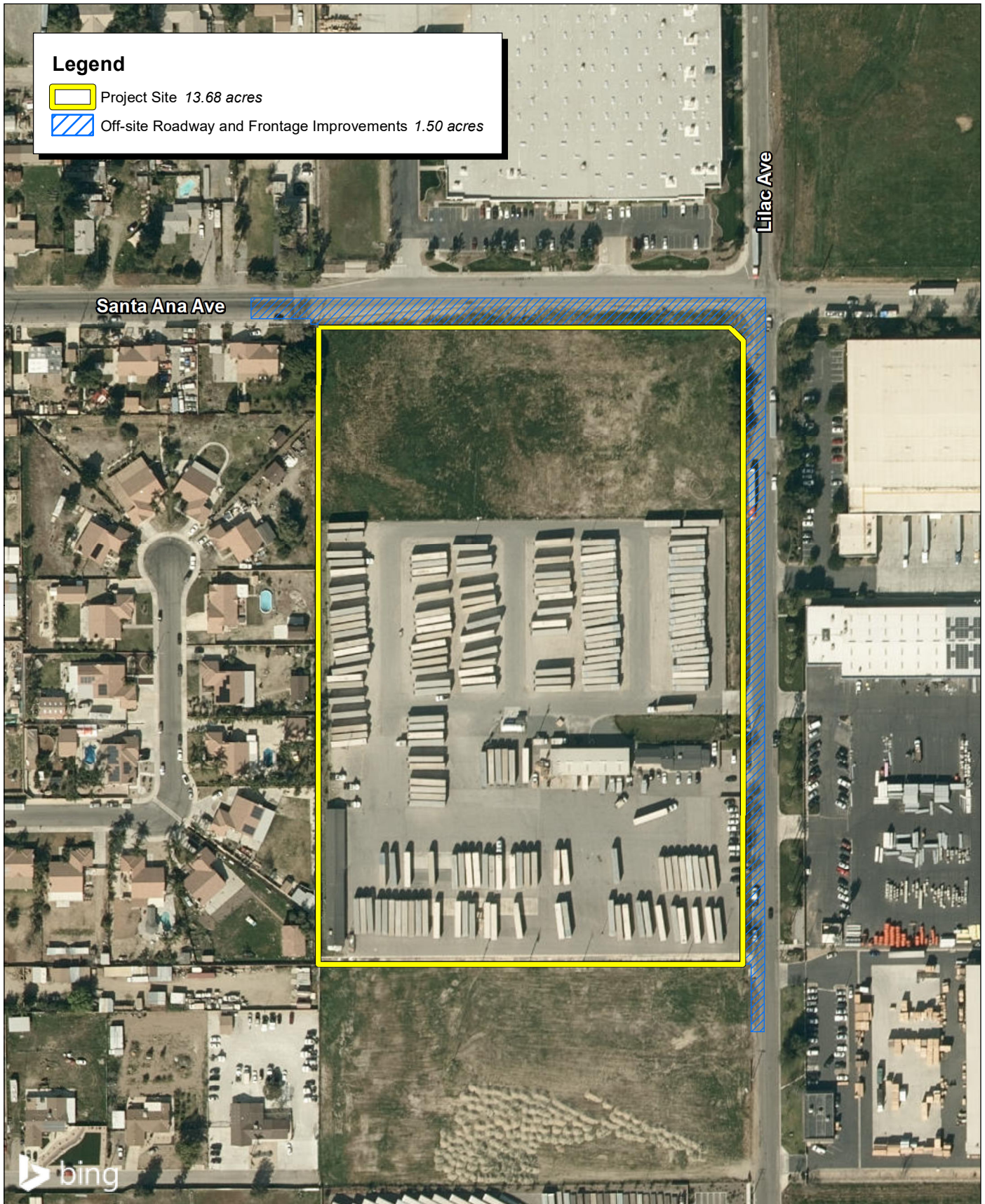
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Source: City of Rialto General Plan. Hogle-Ireland, Inc. (2012).

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Source: Bing Aerial Imagery. Kimley-Horn 7/13/2022.

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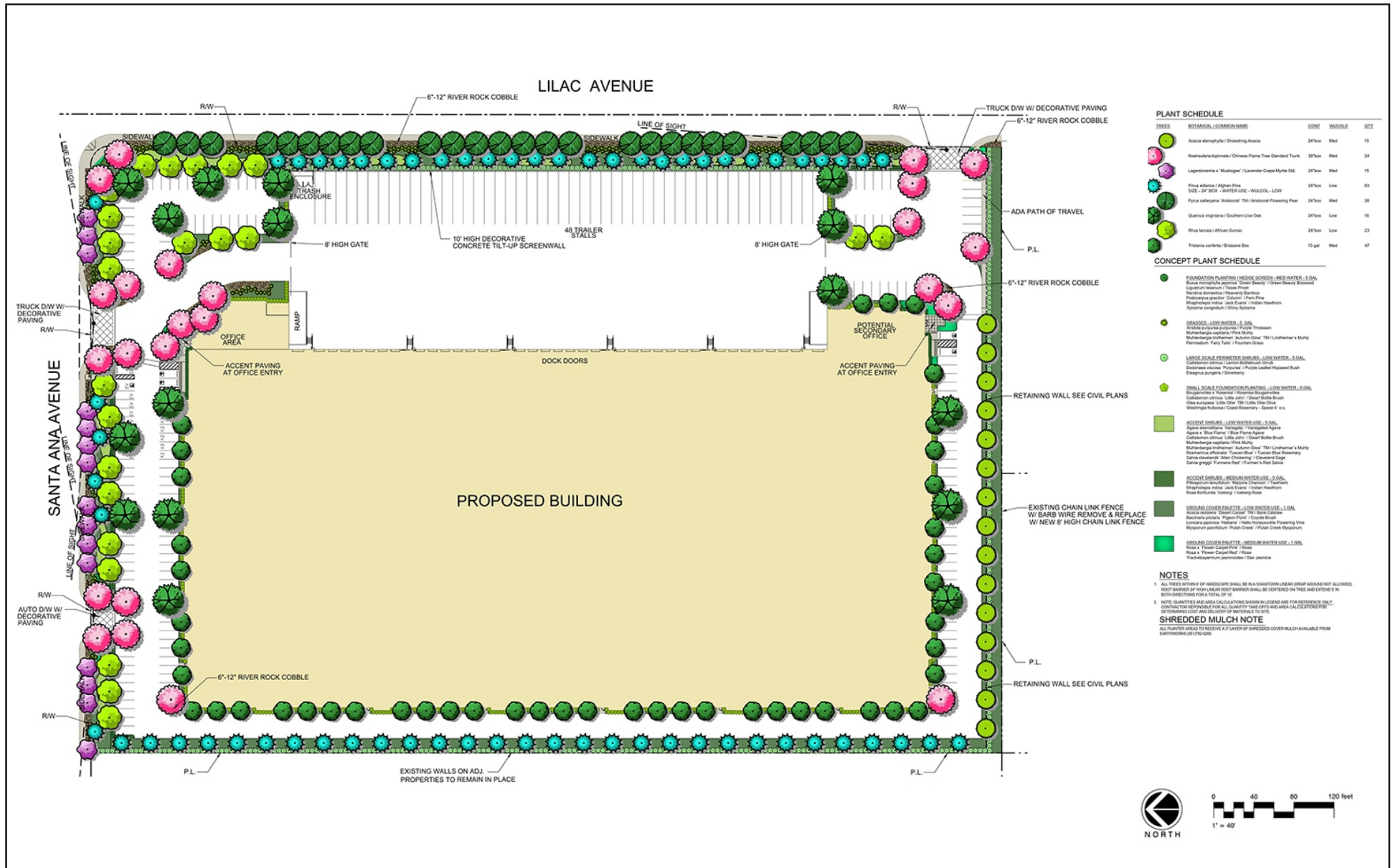
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Exhibit 6 Off-site Roadway and Frontage Improvements

SEEFRIED INDUSTRIAL PROPERTIES, INC.
LILAC AVENUE AND SANTA ANA AVENUE WAREHOUSE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Source: Environs Landscape Architecture Inc; Seefried Industrial Properties, 07/28/2022.

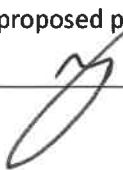
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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology/Soils	☒	Greenhouse Gas Emissions	☐	Hazards/Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☒	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☒	Transportation	☒	Tribal Cultural Resources
☐	Utilities/Services Systems	☐	Wildfire	☒	Mandatory Findings of Significance
Environmental Determination					

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 5-18-2023 Signed: 

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

Environmental Evaluation

Setting

The City of Rialto (City) is located in San Bernardino County (County). The City is situated southwest of the San Gabriel Mountains and west of the San Bernardino Mountains. The City of San Bernardino lies to the north; Muscoy (a census-designated place in San Bernardino County) and the City of San Bernardino lie to the east; portions of the cities of Bloomington, Colton, Riverside, and Grand Terrace lie to the south; and the City of Fontana lies to the west. The project site is bounded by industrial uses to the north, east, residential uses directly to the west, and a vacant lot directly south.

The General Plan defines scenic vistas as picturesque views that are visible from certain parts of the City. There are a number of goals and policies contained in the General Plan, such as Policy 2-14.1 and 2-14.2, that aim to protect views of the San Gabriel and San Bernardino Mountains, La Loma Hills, Jurupa Hills, Box Spring Mountains, Moreno Valley, and Riverside by ensuring that building heights are consistent with the scale of surrounding existing development and restricting the use of building materials that produce glare, such as polished metals or reflective windows.¹² The City Planning Commission conducts design review of proposed development to ensure its compatibility with the existing and potential development in the surrounding area, including visual compatibility.

Would the project:

¹² City of Rialto. 2010. Rialto General Plan, Scenic Vistas. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 13, 2022.

a) Have a substantial adverse effect on a scenic vista?

Less than significant impact. The northern portion of the project site is undeveloped, while the southern portion is developed and contains an existing truck and trailer parking lot with three associated structures. The project site is surrounded by Santa Ana Avenue and existing logistics operations to the north, Lilac Avenue and existing logistics operations to the east, a vacant lot to the south, and residential development to the west.

The Jurupa Hills to the southwest are visible from the project site, as well as the San Bernardino Mountains and San Gabriel Mountains to the north. However, the proposed project is located in an area designated and zoned as Light Industrial, and the proposed project would be consistent with the site's General Plan land use and zoning designation. Specifically, adjacent industrial uses have a maximum allowable building height of six stories, or 75 feet.¹³ The proposed project would have a typical height of 42 feet and a maximum allowable height of approximately 45 feet. Therefore, the proposed project would be consistent with General Plan Policies 2-14.1 and 2-14.2 by ensuring that building heights are consistent with the scale of surrounding, existing development. The proposed project would comply with General Plan Policies intended to protect scenic vistas. Furthermore, the proposed project would be reviewed by the City's Planning Commission to ensure visual compatibility with existing development, including design review to ensure compatible colors and materials. Therefore, the impact would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

No Impact. There are no California Department of Transportation (Caltrans) Designated or Eligible State Scenic Highways within the City. The nearest designated State Scenic Highway is Route 210 from the Los Angeles-San Bernardino County line to just northeast of the La Canada Flintridge area in the San Gabriel Mountains, approximately 26.22 miles to the northwest.¹⁴ The distance of this highway from the site precludes the potential for substantial damage to scenic resources within view of a State Scenic Highway. Therefore, no impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than significant impact. The project site is located within an urbanized area within the City and would be consistent with the existing land designation and zoning. Furthermore, the City Planning Commission would review the project's Precise Plan of Design to ensure compliance with Chapter 18.65 of the Municipal Code as a condition of project approval.¹⁵ The Planning Commission would

¹³ City of Rialto. 2022. Code of Ordinances, Section 18.32.030 - Height, bulk, and space requirements.

¹⁴ California Department of Transportation (Caltrans). 2022. California State Scenic Highway System Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed July 13, 2022.

¹⁵ City of Rialto. 2021. Rialto Municipal Code, Chapter 18.65, Precise Plan of Design. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.65PRPLDE. Accessed July 13, 2022.

ensure the proposed project would be compatible with applicable zoning and other regulations while ensuring consistency with existing development and the surrounding area. Furthermore, the proposed use would not conflict with existing visual character. As discussed previously, the project site is bounded by industrial uses and logistics operations to the north and east, residential uses to the west, and a vacant lot directly south; therefore, the proposed project would be consistent with the existing character of the area. As such, the proposed project would not conflict with applicable regulations governing scenic quality or degrade the existing visual character and the impacts would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than significant impact. Sources of daytime glare include direct beam sunlight and reflections from windows, architectural coatings, glass, and other reflective surfaces. Nighttime illumination and associated glare are generally divided into two sources: stationery and mobile. Stationary sources include structure lighting and decorative landscaping, lighted signs, and streetlights. Mobile sources are primarily headlights from motor vehicles.

The project currently contains an existing truck and trailer parking lot and three associated structures that act as existing sources of lighting or glare. Additional sources of existing lighting and glare near the project site are from streetlights along Santa Ana Avenue and Lilac Avenue, as well as single-family residential lighting to the west and lighting associated with existing logistic operations to the north and east of the project site. Cars parked within the parking areas of the logistic facilities to the north and the east, as well as the windows of these facilities, both act as sources of glare.

The proposed project would include new sources of daytime and nighttime lighting such as streetlights, exterior and interior lighting as part of the proposed building, and new mobile sources of lighting from employee vehicles. Although the proposed project would result in new sources of light and glare, the site is located in an urbanized area that already contains existing sources of light and glare. Proposed lighting would comply with Article 18.61.140, Lighting, of the City Municipal Code. Article 18.61.140 includes lighting standards that are intended to control outdoor lighting and maintain adequate visibility and safety and protect against excessive lighting and glare.¹⁶ In addition, the proposed plan would comply with General Plan Policy 2-14.3 which ensures the use of building materials that do not produce glare. Furthermore, the Planning Commission would review project plans and include requirements in the Conditions of Approval for the project to ensure all lighting includes the required lighting specifications that would reduce lighting and glare impacts to the maximum extent practicable. As a result, the proposed project would not create a significant new source of lighting and glare and the impacts would be less than significant.

Mitigation Measures

None required.

¹⁶ City of Rialto. 2021. Rialto Municipal Code, Article 18.61.140 Lighting. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.61DEGU_18.61.140LI. Accessed July 13, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.2 Agriculture and Forestry Resources <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>				
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 nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Evaluation

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CAL FIRE) regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Would the project:

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

No impact. The proposed project is located in a developed area of the City, with residential and industrial uses surrounding the project site. The project site is designated and zoned as M-1 by the General Plan and Zoning Map.^{17,18} According to the Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the project site is designated as Urban and Built-Up Land.¹⁹ The nearest area of Prime Farmland is located approximately 0.64 mile to the southwest of the project site. Because the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), the proposed project would not necessitate the conversion of such lands. As such, there would be no impact associated with implementation of the proposed project. the impacts would be less than significant.

- b) **Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

No impact. As discussed above in impact 2.2 (a), the project site is located in a developed area of the City and is designated and zoned as Light Industrial. The City does include some areas that are zoned as agricultural, but the project site is not designated as such, and the nearest designated site is 1.91 miles north of the project site. As mentioned above, the project site is designated as Urban and Built-Up Land. As such, no Williamson Act Contract land or agriculturally zoned land exists within the project site. Therefore, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract and there would be no impact associated with implementation of the proposed project.

- 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))?**

No impact. As discussed above in impact 2.2 (a), the project site is located in a developed area of the City and is designated and zoned as Light Industrial. The project site is not zoned for forest land, timberland, or timberland zoned Timberland and there are no such land designations or zoning within the City.^{20,21} Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The

¹⁷ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 8, 2022.

¹⁸ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map---July-2013>. Accessed July 8, 2022.

¹⁹ California Department of Conservation. 2016. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed July 8, 2022.

²⁰ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 8, 2022.

²¹ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map---July-2013>. Accessed July 8, 2022.

proposed project would be consistent with the existing Light Industrial land use designation and zoning. As such, there would be no impact associated with implementation of the proposed project.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No impact. As discussed above in Impact 2.2(a), the project site is located in a developed area of the City and is designated and zoned as Light Industrial. The site does not contain any forest land. Therefore, there would be no impact associated with implementation of the proposed project.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

No impact. As discussed above in Impact 2.2(a), the project site is located in a developed area of the City and is designated and zoned as Light Industrial. As mentioned previously in Impact 2.2(a) and (d), the project site does not contain Farmland or forest land. As such, implementation of the proposed project would not result in the conversion of Farmland to nonagricultural use or the conversion of forest land to non-forest use.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.3 Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
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 nonattainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report prepared by FirstCarbon Solutions (FCS) on November 18, 2022 (Updated May 4, 2023). The report can be found in Appendix A.

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

Setting

Air Pollutants

Air pollutants relevant to the CEQA checklist questions for Air Quality are briefly described below.

- Ozone is a gas that is formed when reactive organic gases (ROG) 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, light wind, and warm temperature conditions are conducive to its formation. Health effects can include, but not be limited to irritated respiratory system, reduced lung function, and aggravated chronic lung diseases.
- ROG, or volatile organic compounds (VOCs), are defined as any compound of carbon—excluding carbon monoxide (CO), carbon dioxide (CO₂), carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROG and VOCs, the two terms are often used interchangeably.

- Nitrogen dioxide (NO₂) forms quickly from NO_x emissions. Health effects from NO₂ can include the following: the potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; contribution to atmospheric discoloration; increased visits to the hospital for respiratory illnesses.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are a primary source of CO, higher ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO depends on exposure and can include slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; death.
- Sulfur dioxide (SO₂) is a colorless, pungent gas. At levels greater than 0.5 parts per million (ppm), the gas has a strong odor, similar to rotten eggs. Sulfur oxides (SO_x) include SO₂ and sulfur trioxide. Sulfuric acid is formed from SO₂, which can lead to acid deposition and can harm natural resources and materials. Although SO₂ concentrations have been reduced to levels well below State and federal standards, further reductions are desirable because SO₂ is a precursor to sulfate and PM₁₀.
- Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5}) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours/days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravation of existing lung disease, causing asthma attacks and acute bronchitis; heart attacks and arrhythmias on populations suffering from heart disease. Health effects from long-term exposure can include the following: reduced lung function, chronic bronchitis, changes in lung morphology, or death.
- Toxic Air Contaminants (TACs) refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

The SCAQMD has developed daily regional and localized thresholds of significance to evaluate construction and operational emissions within its jurisdiction to address the State CEQA Guidelines. The established emissions thresholds were based on attainment status of the air basin relative to air quality standards for specific criteria pollutants. Because concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are considered conservative and would overstate an individual project's contribution related to air quality and health risks.

Regional Thresholds

Construction Emissions

Projects in the South Coast Air Basin (SoCAB) would generate significant construction-related regional emissions if daily emissions would exceed:

- 75 pounds per day of VOC, also known as ROG;
- 100 pounds per day of NO_x;
- 550 pounds per day of CO;
- 150 pounds per day of SO_x;
- 150 pounds per day of PM₁₀; or
- 55 pounds per day of PM_{2.5}.

Regional Thresholds for Operational Emissions

Projects in the SoCAB would generate significant operational regional emissions if daily emissions would exceed:

- 55 pounds per day of VOC;
- 55 pounds per day of NO_x;
- 550 pounds per day of CO;
- 150 pounds per day of SO_x;
- 150 pounds per day of PM₁₀; or
- 55 pounds per day of PM_{2.5}.

Localized Air Quality Significance Thresholds

The SCAQMD recommends that all air quality analyses include a localized assessment of both construction and operational emissions on nearby sensitive receptors. The SCAQMD has developed localized significance thresholds (LSTs) to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs represent maximum mass emissions from a project site that would not result in pollutant concentrations that exceed National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). LSTs are based on ambient concentrations of that pollutant within the State Responsibility Area (SRA) where a project is located, distance to nearest sensitive receptor, and size of the project site, all of which are the primary factors that influence pollutant concentrations.

The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003; revised 2009) for guidance. The LST Methodology assists lead agencies in analyzing localized air

quality impacts, particularly CO, NO_x, PM₁₀, and PM_{2.5}. The SCAQMD provides LST mass rate lookup tables for projects with active construction areas that are less than or equal to 5 acres. These LST lookup values are provided to be used as a screening tool for identifying whether a more detailed analysis is needed for localized impacts. The appropriate LSTs can be determined based on the project's SRA, size, and distance to nearest sensitive receptor. The appropriate SRA for the LSTs is Central San Bernardino Valley (SRA 34) since this area includes the project site. LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. LSTs were obtained for sensitive receptors located within 25 meters from the source area based on the project's proximity to existing sensitive receptors.

Construction

The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds."²² The California Emissions Estimator Model (CalEEMod) calculates construction emissions based on the quantity and types of construction equipment, equipment hours, rates of emission, and maximum daily disturbance activity possible for each piece of equipment for several land use projects and their developmental intensity. The daily maximum disturbed area during construction serves as a factor in determining the project size value of the applicable LSTs for construction. Though the project site is approximately 13.68-acres, grading for the proposed project would result in a 3-acre maximum daily disturbed acreage (see Appendix A).

Construction and Operation

As noted earlier, the SCAQMD has defined LSTs for project areas up to 5 acres in size. Specifically, LSTs are provided for 1-, 2-, and 5-acre sites. Table 2 shows the LSTs for NO₂/NO_x, CO, PM₁₀, and PM_{2.5} for both construction and operational activities for with sensitive receptors being within 25 meters. Appendix A includes a detailed explanation for the selection of the appropriate LSTs. If a project exceeds an applicable LST, then the SCAQMD recommends that project-specific air quality modeling be performed.

Table 2: SCAQMD Localized Significance Thresholds

Pollutant	Construction LST	Operation LST
NO ₂ /NO _x	203 lbs/day	270 lbs/day
PM ₁₀	9 lbs/day	4 lbs/day
PM _{2.5}	5 lbs/day	2 lbs/day
CO	1,230 lbs/day	1,746 lbs/day
Notes: CO = carbon monoxide lbs = pounds LST = localized significance threshold NO_x= nitrogen oxides SO_x= sulfur oxides PM₁₀= particulate matter with an aerodynamic resistance diameter of 10 micrometers or less PM_{2.5}= particulate matter with an aerodynamic resistance diameter of 2.5 micrometers VOC = volatile organic compounds Source: Appendix A.		

²² South Coast Air Quality Management District (SCAQMD). Undated. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>. Accessed November 9, 2022.

Carbon Monoxide Hotspot Thresholds

A CO hotspot represents a condition wherein high concentrations of CO may be produced by motor vehicles accessing a congested traffic intersection under heavy traffic volume conditions.

SCAQMD's analysis of CO attainment in the SoCAB can be used to assist in evaluating the potential for CO exceedances in the SoCAB. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning (AM) and afternoon (PM) peak-hour. These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that of Wilshire Boulevard and Veteran Avenue, which has a volume of approximately 100,000 vehicles per day.

Considering this information, the proposed project would result in a less than significant impact to localized CO concentration if the project traffic would not increase traffic volumes at affected intersections to more than those modeled in the 2003 AQMP.

Health Risk Significance Thresholds

For pollutants without defined significance standards or for air contaminants not covered by the standard criteria cited above, the definition of substantial pollutant concentrations varies. For TACs, "substantial" means that the individual cancer risk exceeds a threshold that is considered to be a prudent risk management level.

The SCAQMD has defined several health risk significance thresholds that it recommends lead agencies use in assessing a project's health risk impacts. The City has not adopted its own set of thresholds. Therefore, the following SCAQMD thresholds are used for this analysis.

Project-Specific Health Risk Significance Thresholds

The SCAQMD has established the following project-specific health risk significance thresholds:²³

- Maximum Incremental Cancer Risk: ≥ 10 in 1 million
- Hazard Index (project increment) ≥ 1.0

A significant impact would occur if a project's impacts exceeded any of these thresholds.

Cumulative Health Risk Significance Thresholds

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.

²³ South Coast Air Quality Management District (SCAQMD). 2023. South Coast AQMD Air Quality Significance Thresholds. Website: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>. Accessed April 26, 2023.

Where available, the significance criteria established by the SCAQMD may be relied upon to make the following determinations.

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than significant impact. This analysis examines the proposed project's impact using three steps based on the SCAQMD's recommended criteria. The three steps are assessing:

- Step 1: Project's contribution to air quality violations
- Step 2: Consistency with basis of SCAQMD's AQMP
- Step 3: Compliance with applicable emission control measures in the AQMP

Step 1 represents an assessment of the overall impacts associated with the proposed project. As discussed further in Impact 2.3(b), the proposed project would not exceed the regional significance thresholds for criteria pollutant emissions from either project construction or operation. Furthermore, as analyzed in Impact 2.3(c), the proposed project would not result in a significant health risk to nearby sensitive receptors or have a localized significant air quality impact. The proposed project would not result in exceedances of SCAQMD's regional thresholds or other air quality standards, contribute to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations after the incorporation of recommended measures. Therefore, Step 1 does not indicate any significant impacts resulting from the implementation of the proposed project.

Step 2 examines the proposed project's consistency with assumptions made in the AQMP. The AQMP is based on land use patterns and forecasts contained in local general plans and other land use planning documents. The proposed project, which would consist of a dry storage warehouse, would be consistent with the City's General Plan and zoning designations for the project site. All five parcels comprising the project site are designated as Light Industrial according to the Rialto General Plan²⁴ and zoned as Light Industrial (M-1) according to the Rialto Zoning Map.²⁵ The project site would not require a General Plan Amendment or rezone. As a result, the proposed project would be consistent with the Rialto General Plan and therefore also consistent with the growth assumptions made for the City of Rialto in the AQMP. In other words, the AQMP accounts for development of the proposed project at the project site.

SCAG is SCAQMD's partner in the preparation of the AQMP, providing the latest economic and demographic forecasts and developing transportation measures. Regional population, housing, and employment projects developed by SCAG are based, in part, on a City's General Plan land use designations. These projections form the foundation for the emissions inventory of the AQMP and are incorporated into the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

²⁴ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed October 29, 2022.

²⁵ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map-July-2013>. Accessed October 29, 2022.

prepared by SCAG to determine priority transportation projects and Vehicle Miles Traveled (VMT) in the SCAG region. Because the AQMP strategy is based on projections from local general plans, projects that are consistent with the local general plan are considered consistent with the air quality-related regional plan. Therefore, Step 2 does not indicate any significant impacts.

Step 3 is an analysis of the proposed project's compliance with applicable emission control measures included in the AQMP. The AQMP relies on the SCAQMD's rule and regulations for emission control, as well as all applicable State and federal regulations. The proposed project would be required to comply with all applicable rules and regulations, including SCAQMD Rule 403 (reducing fugitive dust during construction) and State Building Code requirements. The City of Rialto would verify that the proposed project would comply with these regulations as part of the demolition, grading, and construction permit issuance process and design review. Step 3 does not indicate any significant impacts.

Conclusion

As identified above, the proposed project would be within the development density allowed by the City's General Plan as well as the growth assumptions which form the basis of the applicable AQMP. In addition, the proposed project would not conflict with applicable emission control measures of the AQMP or result in an exceedance in regional significance thresholds. This impact is less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Less than significant impact. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the air basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the State CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the SCAQMD regional thresholds of significance for construction and operations on a project level. Projects that generate emissions below the SCAQMD significance thresholds would be

considered consistent with regional air quality planning efforts would not generate cumulatively considerable emissions.

Regional construction and operational emissions of the proposed project, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the proposed project were estimated using CalEEMod (Version 2020.4.0). The assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix A.

Cumulative Construction Emissions

Construction emissions are described as “short-term” or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the proposed project would result in the temporary generation of VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from construction activities such as site preparation, grading, building construction, architectural coating, and asphalt paving. Fugitive dust emissions are primarily associated with earth disturbance and grading activities, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. Construction-related NO_x emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. VOC emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving.

Table 3 presents the project’s maximum daily construction emissions for each construction activity and during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. Complete CalEEMod output files are included as part of Appendix A.

Table 3: Unmitigated Emissions by Construction Activity (Max Emissions per Day)

Construction Activity	Pollutants (Pounds per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2023						
Demolition	2.39	25.17	21.04	0.06	2.8	1.3
Grading	3.92	66.43	36.11	0.23	7.59	3.77
Building Construction	2.66	18.63	27.05	0.07	1.86	1.05
2024						
Building Construction	2.49	17.65	26.29	0.07	1.77	0.97
Paving	1.71	9.56	15.15	0.02	0.52	0.45
Architectural Coating	36.01	1.33	3.56	0.01	0.23	0.12
Frontage Improvements	2.14	14.80	21.33	0.04	1.14	0.74
Overlap of Building Construction, Paving, Architectural Coating, and Frontage Improvements	42.34	43.34	66.57	0.14	3.67	2.27

Construction Activity	Pollutants (Pounds per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD Significance Thresholds	75	100	550	150	150	55
Emissions Exceed Thresholds?	No	No	No	No	No	No
Notes: CO = carbon monoxide lbs = pounds NO _x = nitrogen oxides PM ₁₀ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less PM _{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers SO _x = sulfur oxides VOC = volatile organic compounds Source: Appendix A.						

As shown in Table 3, construction of the proposed project would not result in any emissions that would exceed SCAQMD maximum daily emissions thresholds.

Cumulative Operational Emissions

Following project construction, long-term operational emissions would be generated from daily operations. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile source emissions are those associated with automobiles that would travel to and from the project site. Assumptions used to estimate mobile source emissions generated by the proposed project were consistent with those presented in the Santa Ana and Lilac Warehouse Traffic Analysis Traffic Analysis dated April 2023. The proposed project was estimated to generate 520 average daily trips during the operational period, with 310 of those trips from passenger vehicles and 210 of the daily trips from trucks.²⁶ Area-source emissions are those associated with natural gas combustion for space and water heating, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with electricity consumption and are more pertinent for greenhouse gas (GHG) emissions than air quality pollutants. Table 4 presents the project's maximum daily operational emissions.

Table 4: Unmitigated Operational Regional Pollutants (Max Emissions per Day)

Operational Activity	Regional Pollutant Emissions (pounds per day) ¹					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	6.44	<0.01	0.03	<0.01	<0.01	<0.01
Energy	0.02	0.17	0.14	<0.01	0.01	0.01
Mobile—Passenger Vehicles	1.97	2.99	21.70	0.05	5.07	1.38
Mobile—Trucks	0.73	45.85	10.52	0.23	8.17	2.58
Stationary	0.29	0.80	0.73	<0.01	0.04	0.04
Total Operational Emissions	9.44	49.81	33.00	0.29	13.30	4.01

²⁶ Urban Crossroads. 2023. Santa Ana and Lilac Warehouse Traffic Analysis. April 2023.

Operational Activity	Regional Pollutant Emissions (pounds per day) ¹					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Notes: CO = carbon monoxide NO_x = oxides of nitrogen PM₁₀ = particulate matter less than 10 microns in diameter PM_{2.5} = particulate matter less than 2.5 microns in diameter SCAQMD = South Coast Air Quality Management District SO_x = sulfur oxides VOC = volatile organic compound ¹ Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent maximum daily emissions that could occur throughout the year. Source: Appendix A.						

As shown in Table 4, the proposed project's regional daily operational emissions would not exceed any of the SCAQMD thresholds of significance. Considering that the proposed project's long-term operational emissions would not exceed any significance thresholds, the proposed project would not result in a cumulatively considerable net increase of operational emissions. The cumulative impact from long-term operation of the proposed project would be less than significant.

Conclusion

As the proposed project would not generate construction or operational emissions at levels above the SCAQMD significance thresholds, impacts related to a cumulatively considerable net increase of any criteria pollutant would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This impact evaluates the potential for the proposed project's construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. Sensitive receptors are defined as individuals who are sensitive to air pollution including children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.²⁷ Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as NO₂ and CO), commercial and/or industrial facilities would be considered sensitive receptors. The nearest sensitive receptors to the proposed project would be single-family residences directly adjacent to the west of the project site, along Trenmar Lane. The

²⁷ South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Website: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed November 30, 2020.

next closest sensitive receptors would also be single-family residences located approximately 80 feet northwest of the project site, across Santa Ana Avenue.

To result in a less than significant impact, the following criteria must be true:

- **Criterion 1:** LST assessment: emissions and air quality impacts during project construction or operation must be below the applicable LSTs to screen out of needing to provide a more detailed air quality analysis. If the proposed project exceeds any applicable LST when the mass rate lookup tables are used as a screening analysis, then project-specific air quality modeling may be performed to determine significance.
- **Criterion 2:** A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would result in an exceedance of the CO ambient air quality standards.
- **Criterion 3:** A TAC analysis must demonstrate that the project would not result in significant health risk impacts to sensitive receptors. This would be achieved by demonstrating that construction or operation of the project would not result in an exceedance of the health risk significance thresholds.

Criterion 1: Localized Significance Threshold Analysis—Criteria Pollutants

The localized construction and operational analyses use thresholds (i.e., LSTs) that represent maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.²⁸ If the proposed project's construction or operational emissions are under those thresholds, the proposed project would not cause or contribute to an exceedance of the standard and would not expose sensitive receptors to substantial pollutant concentrations.

Localized Construction Analysis

The LST Methodology only applies to on-site emissions and states that “off-site mobile emissions from the project should not be included in the emissions compared to LSTs.” Therefore, for purposes of the construction LST analysis, only on-site emissions were compared with the applicable LSTs.

Table 5 presents the proposed project's maximum daily on-site emissions compared with the applicable LSTs for SRA 34, Central San Bernardino Valley. As explained earlier, LSTs for a 3-acre project site were utilized based on the proposed project's anticipated maximum daily disturbed acreage. These LSTs were linearly interpolated from the SCAQMD's 2-acre and 5-acre LSTs. LSTs were obtained for sensitive receptors located 25 meters from the source based on the project site's proximity to existing sensitive receptors. The CalEEMod analysis assumes that all construction activities would comply with SCAQMD Rule 403 for fugitive dust, as is mandatory for all construction projects in the SoCAB.

²⁸ South Coast Air Quality Management District (SCAQMD). 2009. Final Localized Significance Threshold Methodology, Appendix C. Revised October 21, 2009. Website: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed November 9, 2022.

Table 5: Construction Localized Significance Screening Analysis

Activity	On-site Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2023				
Demolition	21.48	19.64	2.47	1.15
Grading	34.52	28.05	5.07	2.74
Building Construction	14.38	16.24	0.70	0.66
2024				
Building Construction	13.44	16.17	0.61	0.58
Paving	9.52	14.63	0.47	0.43
Architectural Coating	1.22	1.81	0.06	0.06
Frontage Improvements	14.30	20.01	0.62	0.59
Overlap (Building Construction, Paving, Arc. Coating, and Frontage Improvements)	38.48	52.61	1.76	1.66
Total Construction Duration (2023-2024)				
Maximum Daily On-site Construction Emissions	38.48	52.61	5.07	2.74
Localized Significance Thresholds	203	1,230	9	5
Exceeds Threshold?	No	No	No	No
Notes: CO = carbon monoxide NO _x = oxides of nitrogen PM ₁₀ = particulate matter less than 10 microns in diameter PM _{2.5} = particulate matter less than 2.5 microns in diameter Source: Appendix A.				

As shown in Table 5, the proposed project's maximum daily on-site emissions would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀ and PM_{2.5}. Therefore, localized construction impacts related to these air pollutants would be less than significant.

Localized Operational Analysis

Like the construction LST analysis above, the applicable operational LSTs were obtained for a project located in SRA 34, Central San Bernardino Valley, with the nearest sensitive receptor being 25 meters away. LSTs assumed a 5-acre project size, which is the largest project size used for analysis in the LST guidance document. The LST Methodology recommends that only on-site emissions are evaluated using LSTs. Because most of the proposed project's mobile source emissions would occur on the local and regional roadway network away from the project site, a trip length of 0.5 mile was used in the modeling input assumptions to account for on-site emissions and from mobile sources. The 0.5-mile on-site trip length is a conservative estimate that accounts for the maximum project site

distance a vehicle could travel, not the most likely or fastest route, to ensure all potential impacts are considered. Table 6 presents the proposed project's maximum daily on-site emissions compared with the appropriate LSTs.

Table 6: Operational Localized Screening Significance Analysis

Emissions Source	Pounds per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area	<0.01	0.03	<0.01	<0.01
Energy	0.17	0.14	0.01	0.01
Mobile	0.57	3.48	0.20	0.06
Mobile – Trucks Only	5.04	4.13	0.10	0.03
Stationary	0.80	0.73	0.04	0.04
Maximum Daily On-site Operational Emissions	6.58	8.51	0.36	0.14
Localized Significance Thresholds	270	1,746	4	2
Exceeds Threshold?	No	No	No	No
Notes: CO = carbon monoxide NO _x = oxides of nitrogen PM ₁₀ = particulate matter less than 10 microns in diameter PM _{2.5} = particulate matter less than 2.5 microns in diameter Source: Appendix A.				

As shown in Table 6, the proposed project's maximum daily on-site emissions would not exceed SCAQMD LSTs for NO_x, CO, PM₁₀ and PM_{2.5}. Accordingly, the proposed project's operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. Therefore, this impact would be less than significant.

Criterion 2: Carbon Monoxide Hotspot Analysis

As previously discussed, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods in the SCAQMD's 1992 CO Plan. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood).²⁹ These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. Therefore, if operation of the proposed project results in less than 100,000 daily vehicle trips at affected intersections or roadways segments under existing plus project conditions, then a less than significant CO impact would occur.

²⁹ South Coast Air Quality Management District (SCAQMD). 2003. Final 2003 AQMP Appendix V, Modeling and Attainment Demonstrations. August.

The traffic analysis prepared for the proposed project by Urban Crossroads identified that the proposed project would generate fewer than 60 new actual peak-hour trips (52 AM peak-hour trips and 55 PM peak-hour trips) and fewer than 100 new passenger car equivalent (PCE) peak-hour trips (86 AM peak-hour trips and 91 PM peak-hour trips).³⁰ The analysis further determined that the proposed project would neither individually nor cumulatively result in less than acceptable Level of Service at surrounding intersections. These factors indicate that the proposed project would not generate the traffic volumes or congestion necessary to result in CO hotspots. Therefore, the proposed project would not result in a significant impact to air quality regarding CO hotspots.

Criterion 3: Toxic Air Contaminant Analysis

Toxic Air Pollutants—On-site Workers

A variety of State and national programs protect workers from safety hazards, including high air pollutant concentrations.^{31,32} On-site workers are not required to be addressed through this health risk assessment process. A document published by the California Air Pollution Control Officers Association (CAPCOA) indicates that on-site receptors are included in risk assessments if they are persons not employed by the project.³³ Persons not employed by the proposed project would not remain on-site for any significant period. Therefore, a health risk assessment for on-site workers (employed or not employed by the project) is not required or recommended. No further discussion is necessary.

Health Risk Assessments

During construction and operation, the proposed project would result in emissions of several TACs that could potentially impact nearby sensitive receptors. The SCAQMD has defined health risk significance thresholds. These thresholds are represented as a cancer risk to the public and a non-cancer hazard from exposures to TACs. Cancer risk represents the probability (in terms of risk per million individuals) that an individual would contract cancer resulting from exposure to TACs continuously over a period of several years. The principal TAC emission analyzed in this assessment was DPM from operation of off-road equipment and diesel-powered delivery and worker vehicles during construction and operation. DPM has been identified by the California Air Resources Board (ARB) as a carcinogenic substance. For purposes of this analysis, DPM is represented as exhaust emissions of PM₁₀. DPM represented as exhaust PM₁₀ adequately addresses impacts from PM₁₀ and PM_{2.5} emissions, as PM_{2.5} comprises a component of PM₁₀. Fugitive dust components of PM₁₀ and PM_{2.5} would be controlled through compliance with SCAQMD Rule 403 (reducing fugitive dust during construction). The SCAQMD and California Office of Environmental Health Hazard Assessment (OEHHA) recommends that an exposure duration (residency time) of 30 years be used to estimate individual cancer risk for the maximally individual resident.³⁴ Exposures to TACs can also result in

³⁰ Urban Crossroads. 2023. Santa Ana and Lilac Warehouse Traffic Analysis. April 2023.

³¹ Occupational Safety and Health Administration (OSHA). 2003. United States Department of Labor. Safety and Health Topics: Methane. Website: www.osha.gov/dts/chemicalsampling/data/CH_250700.html. Accessed October 24, 2022.

³² Centers for Disease Control and Prevention (CDC). 2012. Construction—website: www.cdc.gov/niosh/construction/. Indoor Environmental Quality—website: www.cdc.gov/niosh/topics/indoorenv/constructionieq.html. Accessed October 24, 2022.

³³ California Air Pollution Control Officers Association (CAPCOA). 2009. Health Risk Assessments for Proposed Land Use Projects. Website: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf. Accessed October 24, 2022.

³⁴ Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program-Risk Assessment Guidelines. February.

both short-term (acute) or long-term (chronic) non-cancer health impacts. Such impacts could include illnesses related to reproductive effects, respiratory effects, eye sensitivity, immune effects, kidney effects, blood effects, central nervous system, birth defects, or other adverse environmental effects.

Toxic Air Contaminant Construction Analysis

The cancer risk probability is determined by multiplying the chemical's annual concentration by its cancer potency factor, a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It is an upper-limit estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu\text{g}/\text{m}^3$) over a lifetime of 30 years. Guidance from OEHHA recommends a refinement to the standard point estimate approach with the use of age-specific breathing rates and age sensitivity factors to assess risk for susceptible subpopulations such as children. For the inhalation pathway, the procedure requires the incorporation of several discrete variates to effectively quantify dose for each age group. Once determined, contaminant dose is multiplied by the cancer potency factor in units of inverse dose expressed in milligrams per kilogram per day ($\text{mg}/\text{kg}/\text{day}$) ⁻¹ to derive the cancer risk estimate. Detailed parameters, a detailed description of the methodology, and complete calculations are contained in Appendix A of this Draft IS/MND. Table 7 summarizes the emission rates of unmitigated DPM during construction of the project.

Table 7: Project DPM Construction Emissions—Unmitigated

On-site DPM—Area 1 (grams/sec)	Off-site DPM—Segment 1 (grams/sec)	Off-site DPM—Segment 2 (grams/sec)	Off-site DPM—Segment 3 (grams/sec)
Annual Construction Emissions—Unmitigated			
0.003243	0.000007	0.000001	0.000006
Source: Appendix A.			

The estimated health and hazard impacts at the Maximally Impacted Sensitive Receptor (MIR) from the project's unmitigated construction emissions are provided in Table 8.

Table 8: Estimated Health Risks and Hazards During Project Construction—Unmitigated

Source	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index
Risks and Hazards at the MIR ¹	6.06	0.0068
Significance Threshold	10	1
Exceeds Individual Source Threshold?	No	No
Notes: MIR = Maximally Impacted Sensitive Receptor ¹ The MIR was determined to be an existing single-family dwelling unit located approximately 110 feet (33.6 meters) southwest of the project site. Source: Appendix A.		

The MIR during construction, which is the sensitive receptor that has the highest cancer risk and the highest non-cancer hazard index, was determined existing single-family dwelling unit located approximately 110 feet (33.6 meters) west of the project site. As noted in Table 8, the project's construction DPM emissions would not exceed the SCAQMD's cancer risk significance threshold or non-cancer hazard index significance threshold at the MIR. Therefore, the proposed project would not result in a significant impact on nearby sensitive receptors from TACs during construction.

Toxic Air Contaminant Operational Analysis

Common sources of TACs include high traffic freeways, distribution centers, large gas dispensing facilities, and dry cleaners. The proposed project would develop and operate a warehouse building with ancillary office space, which would include on-site sources of TACs during operation. The proposed project would primarily generate passenger vehicle trips from employees, visitors, and light-duty delivery vehicles traveling to and from the project site; however, the proposed project would also be served with daily truck deliveries. The main source of DPM from the long-term operations of logistic centers is from combustion of diesel fuel in diesel-powered engines in on-road delivery trucks. Motor vehicle emissions refer to DPM exhaust emissions from motor vehicles that would travel to and from the project site each day. An estimate of the number of vehicle trips that the proposed project would generate was prepared by Urban Crossroads, as shown in Table 9.

Table 9: Vehicle Trip Generation During Operations (Daily)

Vehicle Type	Daily Trips
Passenger Cars	310
2-Axle Trucks	6
3-Axle Trucks	58
4+-Axle Trucks	146
Total Project Trips (Actual Vehicles)	520
Source: Urban Crossroads. 2023. Santa Ana and Lilac Warehouse Traffic Analysis. April 19, 2023.	

Operational emissions for the proposed project were assessed assuming the first year of operations would occur in 2024. DPM emissions (as PM₁₀ exhaust) were estimated using EMFAC2021. Assumptions used in the analysis, as well a more detailed description of the methodology used in the analysis, are contained in Appendix A.

An operational HRA was performed to determine calculate the cancer health risks and the non-hazard indices for sensitive receptors within approximately 2,000 feet of the project boundary. Similar to the HRA performed for construction emissions, air dispersion modeling was utilized to assess the proposed project's potential health risks using the American Meteorological Society/EPA Regulatory Model (AERMOD) Version 22112. The results HRA prepared for project operations, for cancer risk and long-term chronic cancer risk, are summarized below in Table 10.

Table 10: Summary of Health Risk Impacts from Project Operations (30-Year Exposure)

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index
Operations Only		
Risks and Hazards at the MIR over 30-year exposure	2.75	0.0006
SCAQMD Significance Threshold	10	1
Exceeds Individual Source Threshold?	No	No
Notes: MIR = Maximally Impacted Sensitive Receptor SCAQMD = South Coast Air Quality Management District Source: Appendix A.		

As noted in Table 10, the health risks and hazard index are below the SCAQMD's thresholds of significance at the MIR. Furthermore, although construction and operational impacts are considered separately, combined exposure from construction and operations would not exceed the applicable health risk thresholds. Therefore, the proposed project's operation would not expose sensitive receptors to substantial pollutant concentrations.

Cumulative Toxic Air Contaminant Operational Analysis

As previously discussed, projects that exceed project-specific significance thresholds are considered cumulatively considerable by the SCAQMD. Conversely, projects that do not exceed project-specific thresholds are generally not considered cumulatively significant. As discussed in Criteria 1 through 3, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Since the proposed project would not exceed project-specific thresholds the proposed project would not result in cumulatively significant impacts.

Conclusion

As demonstrated above, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during construction or operation of the proposed project. Therefore, the proposed project would result in a less than significant impact.

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

Less than significant impact. Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Odor-related symptoms reported in several studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea,

loss of appetite, stomachache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation.³⁵

The SCAQMD's role is to protect the public's health from air pollution by overseeing and enforcing regulations. The SCAQMD's resolution activity for odor compliance is mandated under California Health and Safety Code Section 41700 and falls under SCAQMD Rule 402. This rule on Public Nuisance Regulation states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

The SCAQMD does not provide a suggested screening distance for odor-generating land uses and operations. However, the San Joaquin Valley Air Pollution Control District does have a screening distance for odor sources that can be used as a guide to assess whether nearby facilities could be sources of significant odors. These screening distances by type of odor generator are listed in Table 11.

Table 11: Screening Levels for Potential Odor Sources

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Source: Appendix A.	

³⁵ South Coast Air Quality Management District (SCAQMD). 2007. Odor Detection, Mitigation and Control Technology Forum and Roundtable Discussion. 2007. Website: <http://www.aqmd.gov/docs/default-source/technology-research/Technology-Forums/odorforumsummary.pdf>. Accessed November 17, 2022.

Construction-related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel fueled construction equipment. However, because of the low intensity of these emissions, intermittent and short-term nature of construction activities, and highly diffusive properties of diesel exhaust, a substantial number of nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The proposed project would utilize typical construction techniques, and odors would be typical of most construction-sites and temporary in nature. This impact would be less than significant.

Operational-related Odors

The proposed project would develop and operate a warehouse building with ancillary office space. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, wastewater pump stations, composting facilities, feed lots, coffee roasters, asphalt batch plants, and rendering plants. The proposed project would not engage in any of these activities and would not be considered an odor generator as identified in Table 11. Therefore, the proposed project would not be considered a substantial generator of objectionable odors during operations. Minor sources of odors, such as exhaust from mobile sources, are not typically associated with numerous odor complaints, but are known to have temporary and less concentrated odors. In summary, the project's long-term operational activities would not have any substantial odor sources that would expose nearby receptors.

Conclusion

Neither construction nor long-term operations of the proposed project is anticipated to generate any significant objectionable odors that affect a substantial number of people. Considering the low intensity of potential odor emissions, the proposed project's operational activities would not expose receptors to objectionable odor emissions. This impact would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.4 Biological Resources <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States 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, and regulations or by the California Department of Fish and Wildlife or United States 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 wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan?	☐	☐	☐	☒

Environmental Evaluation

The analysis in this section is based, in part, on the Biological Resources Assessment (BRA) prepared by FirstCarbon Solutions (FCS) on November 3, 2022. The BRA can be found in Appendix B.

Setting

The City is located in San Bernardino Valley, which is bounded by the San Gabriel and San Bernardino Mountains to the north; the San Jacinto Mountains to the east; the Temescal and Santa Ana Mountains to the south; and Pomona Valley to the west. The project site and surrounding area are

located on an alluvial terrace of the Santa Ana River, which is located approximately 1.7 miles to the southeast. The project site is surrounded by Santa Ana Avenue and existing logistics operations to the north, Lilac Avenue and existing logistics operations to the east, a vacant lot to the south, and residential development to the west.

An FCS Biologist conducted a general biological survey of the project site on July 15, 2022, between approximately 6:00 p.m. and 6:45 p.m. Ruderal/disturbed habitat was mapped in the northern, undeveloped portion of the site as well as a strip of landscaped area in the developed portion of the site along Lilac Avenue. This portion of the site had been recently disked and is likely disked on a regular basis as part of weed abatement activities. Species observed in this disturbed habitat included a mixture of non-native and native plant species. Several trees are located in the ruderal/disturbed areas mapped on-site, including a small group of lemon-scented gum (*Corymbia citriodora*) located along Lilac Avenue and a row of Chinaberry trees (*Melia azedarach*) in the landscaped area between the existing development and Lilac Avenue as well as in the northern portion of the site. The southern portion of the project site is developed and was mapped as urban/developed and supports a truck and trailer parking lot, warehouse and office buildings, 8-foot masonry block walls along eastern and western property lines, and a chainlink fence along the northern and southern property lines. An area of non-native grassland was mapped northeast of and within 500 feet of the project site and was observed to be dominated by wild oat (*Avena fatua*) and common fiddleneck (*Amsinckia intermedia*) and included other species observed in the ruderal/disturbed habitat on the project site.

Wildlife activity during the general biological reconnaissance survey was moderate and consisted primarily of avian species including house finch (*Haemorrhous mexicanus*), mourning dove (*Zenaida macroura*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), American kestrel (*Falco sparverius*), and western kingbird (*Tyrannus verticalis*). Other bird species expected to occur on-site include common species such as California scrub jay (*Aphelocoma californica*) and northern mockingbird (*Mimus polyglottos*). Three mammal species were detected on-site, including striped skunk (*Mephitis*; carcass), California ground squirrel (*Otospermophilus beecheyi*; burrows), and valley pocket gophers (*Thomomys bottae*; burrows). One reptile, western side-blotched lizard (*Uta stansburiana*), was observed on the project site. The western fence lizard (*Sceloporus occidentalis*), a common lizard, is also expected to occur on-site.

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

Less than significant with mitigation incorporated. An FCS Biologist compiled a list of threatened, endangered, and otherwise special-status species previously recorded in the project vicinity. The list was based on a search of the California Natural Diversity Database (CNDDDB), United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database, and the California Native Plant Society Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants

of California database for the *Fontana, California*, USGS 7.5-minute Topographic Quadrangle Map. The California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System (BIOS 5) was used to determine distances between species occurrences and the project site.

The CNDDB, CNPSEI, and IPaC identified 29 special-status plant species and 49 special-status wildlife species as occurring within 10 miles of the project site.^{36,37,38} Each of these species are listed in Appendix C, Tables 1 and 2 of the project BRA (Appendix B). Tables 1 and 2 list each species' status, required habitat, and potential to occur within the project site.

Special-status Plants

The potential for occurrence of a species was based on presence of suitable habitats, soil types, and occurrences recorded by the CNPSEI and CNDDB.^{39,40,41} The project site is significantly disturbed and is surrounded by urbanized development and undeveloped lands that have been repeatedly disturbed (disked). Because of the conditions on and adjacent to the project site, all special-status plants that occur in the region were assessed as having no or low potential to occur on or adjacent to the project site.

Special-status Wildlife Species

Most of the 49 special-status wildlife species recorded within the project vicinity were assessed as having no or low potential to occur because the project site is outside of their known distributional range or does not support suitable habitat. The project site contains suitable habitat conditions for two species, Cooper's hawk (*Accipiter cooperi*) and burrowing owl (*Athene cunicularia*). These species were found to have moderate potential to occur on-site.

Cooper's hawk

The Cooper's hawk is considered a Watch List species by the California Department of Fish and Wildlife (CDFW) and nests of this species are protected by the Migratory Bird Treaty Act (MBTA) and Fish and Game Codes pertaining to native nesting avian species. Cooper's hawk typically occurs in wooded areas but has adapted to foraging and nesting in urban areas with sufficient tree cover. This species typically hunts small birds in broken woodland and habitat edges, and nests in deciduous trees in crotches 6-15 meters above the ground. A small group of lemon-scented gum trees in the northern portion of the project site may provide suitable nesting habitat for Cooper's hawk. There is one recent record of occurrence between 5 and 10 miles from the project site.⁴² There is moderate potential for this species to occur on-site as a nester or forager.

³⁶ California Department of Fish and Wildlife (CDFW). 2022. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx>. Accessed July 14, 2022.

³⁷ California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS 5). Website: <https://map.dfg.ca.gov/bios/>. Accessed July 14, 2022.

³⁸ United States Fish and Wildlife Service (USFWS). 2022. Information for Planning and Consultation (IPaC). Website: <https://ecos.fws.gov/ipac/>. Accessed July 14, 2022.

³⁹ California Department of Fish and Wildlife (CDFW). 2022. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx>. Accessed July 14, 2022.

⁴⁰ California Native Plant Society (CNPS). 2022. California Native Plant Society Rare and Endangered Plant Inventory. Website: <http://www.rareplants.cnps.org/>. Accessed July 14, 2022.

⁴¹ California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS 5). Website: <https://map.dfg.ca.gov/bios/>. Accessed July 14, 2022.

⁴² Ibid.

Burrowing owl

The burrowing owl is considered a Special Species of Concern (SSC) by the CDFW and a Bird of Conservation Concern (BCC) by the USFWS and nesting burrows of this species are protected by the MBTA and Fish and Game Codes pertaining to native nesting avian species. Burrowing owls occur in open, dry, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. This species utilizes, modifies, and nests in burrows created by other species, most notably those of the California ground squirrel, but also those excavated by coyotes, desert kit foxes, desert tortoises, American badgers, and other burrowing mammals. The northern portion of the project site contains suitable habitat with low-growing vegetation and small mammal burrows (California ground squirrels and valley pocket gophers). There are five recent records of occurrence within 5 miles of the project site and nine recent records and two historical records between 5 and 10 miles from the project site.⁴³ Therefore, there is moderate potential for this species to occur on-site as a breeder, winter resident, and/or for post-breeding dispersal. To prevent potential project impacts on burrowing owl that may utilize the project site, pre-construction surveys shall be conducted prior to any project-related ground disturbance, as described in Mitigation Measure (MM) BIO-1. The implementation of this mitigation measure would reduce potential impacts to less than significant levels.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?

No impact. The CNDDDB identified two sensitive natural communities that are known to occur within 5 miles of the project site: Riversidian Alluvial Fan Sage Scrub and Southern Cottonwood Willow Riparian Forest. Three sensitive natural communities, including Southern California Arroyo Chub, Southern Riparian Scrub, and Southern Sycamore Alder Riparian Woodland have been recorded in the CNDDDB between 5 and 10 miles from the project site.⁴⁴ These communities are not present on or adjacent to the project site. Therefore, the proposed project would have no impact.

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?

No impact. The project site does not contain any State or federally protected wetlands, nor any vernal pools or features indicative of the historic presence of vernal pools on the project site or within 500 feet. The project site has been developed previously and does not support any protected wetlands. Because there are no wetlands or vernal pools on or adjacent to the project site, the proposed project would have no impact related to effects on State or federally protected wetlands or vernal pools.

⁴³ California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS 5). Website: <https://map.dfg.ca.gov/bios/>. Accessed July 14, 2022.

⁴⁴ California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS 5). Website: <https://map.dfg.ca.gov/bios/>. Accessed July 14, 2022.

- 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 wildlife nursery sites?**

Less than significant with mitigation incorporated. The project site does not function as a wildlife movement corridor. The majority of the project site consists of developed lands containing three structures and truck and trailer parking. The project site is also surrounded by fencing in the southern developed portion of the site, as well as roads and highways to the east and north, and residential development to the west, all of which limits wildlife movement to and from the project site. While wildlife movement within the project site and between adjacent lands is feasible, the surrounding human development is likely to obstruct the movement of terrestrial wildlife. Therefore, the proposed project would not have a significant impact on the movement of local wildlife and no mitigation is required.

Nesting Birds

The project site contains potential nesting habitat for a variety of bird species. Many common passerine species may nest in suitable habitats on and adjacent to the project site (trees, non-native annual grassland), including mourning dove, Anna's hummingbird, northern mockingbird, and house finch, among others. Cooper's hawk and other common raptor species such as red-tailed hawk and American kestrel may nest in trees on or adjacent to the project site. Burrowing owl (if suitable burrows are present) may nest and forage in barren areas, on and adjacent to the project site. Ground nesting birds that prefer open habitats may nest in the undeveloped area in the northern portion of the project site.

Project activities could directly or indirectly cause impacts to nesting birds on and adjacent to the project site. Project construction activities could cause direct impacts through destruction of nests, eggs, or chicks, or indirect impacts through hazing or harassment of actively nesting birds to a degree that causes them to abandon the nest temporarily or permanently. These impacts would be considered violations of the MBTA and Sections 3800, 3513, and 3503.5 of the Fish and Game Code. Avoidance and mitigation measures would be implemented to minimize impacts on nesting birds. These include reasonable and prudent measures to avoid impacts to nesting birds, such as seasonal avoidance, which are described in MM BIO-2. The implementation of this mitigation measure would reduce potential impacts to nesting birds to less than significant levels.

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

No impact. Prior to conducting the reconnaissance-level field survey, an FCS Biologist reviewed applicable City and County ordinances pertaining to tree and native vegetation preservation and protection and ascertained whether measures or permits are required to remove, replace, or transplant protected trees or native vegetation. As discussed previously, several trees are located in the ruderal/disturbed areas mapped on-site, including a small group of lemon-scented gum located along Lilac Avenue and a row of Chinaberry trees in the landscaped area between the existing development and Lilac Avenue as well as in the ruderal/disturbed area in the northern portion of the site as well. None of the trees on-site would be considered street trees subject to Municipal Code

(Chapter 11.08—Street Trees—Vegetation) pertaining to the management of street trees and public trees. Therefore, the proposed project would not conflict with any local policies or ordinances and would have no impact.

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?

No impact. The proposed project does not lie within the boundaries of any adopted Habitat Conservation Plan (HCP) Natural Community Conservation Plan (NCCP), or other approved local, regional, or State Habitat Conservation Plan. Therefore, the proposed project would have no impact.

Mitigation Measures

MM BIO-1 Pre-construction Surveys for Burrowing Owl (including avoidance if found)

To determine whether burrowing owls have occupied the project site prior to its development, a qualified Biologist shall perform a pre-construction burrowing owl survey to determine burrow locations within 30 days prior to construction activities using California Department of Fish and Wildlife (CDFW) Guidelines.²⁷ If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. Survey for occupied burrows shall be completed within all construction areas and within 300 feet from the proposed project impact area (where possible and appropriate based on locations of barren or ruderal habitats). At least 15 days prior to the expected start of any project-related ground disturbance activities, or restart of activities, the City shall provide a burrowing owl survey report with mapping exhibits to the CDFW. If no burrowing owl are detected during the pre-construction survey, no further action is necessary.

If burrowing owl is detected during the pre-construction survey, the project proponent shall retain a qualified Biologist to develop and implement a Burrowing Owl Mitigation Plan. The Burrowing Owl Mitigation Plan shall contain the following elements (as outlined in the CDFW guidelines) at a minimum:

- Avoidance of burrowing owl during construction, including establishment of a 160-foot radius around occupied burrows during the nonbreeding season (September 1 through February 14) or a 300-foot radius around occupied burrows during the breeding season (February 15 through August 31), within which construction activities may not occur until a qualified Biologist has determined that (1) nonbreeding season owl have dispersed from the area; or (2) breeding season owl have fledged their juveniles from the occupied burrows and the juveniles are foraging independently and are capable of independent survival or have dispersed from the area.
- A plan for implementing a passive relocation program for nonbreeding owls, should it be needed. The passive relocation techniques shall be consistent with

CDFW guidelines, including installation of artificial burrows at an off-site location and use of one-way exclusion doors to ensure owls have left the burrow(s).

MM BIO-2 Protection of Active Bird Nests (includes pre-construction survey and avoidance, if found).

- No action is necessary if construction will occur outside of the avian breeding season (typically September 1 through January 31).
- If construction activities are scheduled to occur during the nesting season (February 1 through August 31), mitigation would be necessary to avoid potential impacts to migratory birds and their nests.
- If construction or tree removal is proposed during the breeding/nesting season for migratory birds (typically February 1 through August 31), a qualified Biologist shall conduct pre-construction surveys for migratory birds on the project site, including a 300-foot survey buffer, no more than 3 days prior to the start of ground-disturbing activities. If construction is delayed or suspended for more than 3 days after the survey, the area shall be resurveyed to re-confirm the presence/absence of any active nests.
- No action is necessary if no active nests are found. If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW) (as appropriate) will be notified regarding the status of the nest. Furthermore, construction activities will be restricted as necessary to avoid disturbance of the nest until it is abandoned, or the Biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 300 feet around an active raptor nest and 50-foot radius around an active non-raptor passerine bird nest) or alteration of the construction schedule.
- A qualified Biologist will delineate the buffer using nest buffer signs, environmentally sensitive area fencing, pin flags, and/or flagging tape. The buffer zone will be maintained around the active nest site(s) until the young have fledged and are foraging independently.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.5 Cultural Resources and Tribal Cultural Resources				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
<i>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>				
d) 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	☐	☒	☐	☐
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☒	☐	☐

Environmental Evaluation

This section is based, in part, on the findings of the Phase I Cultural Resources Assessment (Phase I CRA) (Appendix C) prepared by FCS on October 31, 2022.

Setting

This section describes the existing cultural resources setting and potential effects from project implementation on the project site and its surrounding area. Descriptions and analysis in this section are based on information provided by the California Native American Heritage Commission (NAHC), South Central Coastal Information Center (SCCIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks (CHL) list, California Points of Historic Interest (CPHI) list, and the California Built Environment Resource Directory (BERD).

The confidential Phase I CRA and other supporting information may be requested by those with appropriate credentials.

South Central Coastal Information Center

On October 11, 2022, a records search for the project site and a 0.5-mile radius beyond the project boundaries was conducted at the SCCIC located at California State University, Fullerton. The current inventories of the NRHP, the CRHR, the CHL list, the CPHI list, and the California BERD for San Bernardino County were reviewed to determine the existence of previously documented local historical resources. The results of the records search indicate that 10 cultural resources (one prehistoric resource and two historic resources) have been recorded within the 0.5-mile search radius, none of which are located within the project area. Although no cultural resources are recorded within the project boundaries, the prehistoric resource is immediately adjacent to the project boundaries. In addition, 11 area-specific survey reports are on file with the SCCIC for the project site and its 0.5-mile search radius, none of which were within the project boundaries indicating that the project site has not been previously surveyed.

Native American Heritage Commission

On July 26, 2022, FCS sent a request to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on September 27, 2022, indicating that the Sacred Lands File search failed to locate the presence of Native American cultural resources within the immediate project area. The NAHC provided a list of 17 tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential Tribal Cultural Resources (TCRs) that may be affected by the proposed project are addressed, a letter containing project information requesting any additional information was sent to each tribal representative on October 25, 2022. Four responses from tribal representatives were received. A response was received on October 25, 2022, from the Gabrieleño Tongva Indians of California indicating that the tribal band is coastal and do not wish to comment. Three additional responses were received on October 26, 2022, one from the Gabrieleño Band of Mission Indians-Kizh Nation requesting lead agency information. The Quechan Tribe of the Fort Yuma Reservation did not wish to comment on the proposed project and deferred to more local Tribes and expressed support for their determination on the proposed project. The final response was from the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) and the Tribe determined that the proposed project is not located near any known TCRs.

The City of Rialto initiated AB 52 consultation on November 4, 2022. The City received a response from the Yuhaaviatam of San Manuel Nation (YSMN) on November 30, 2022, indicating that the project area exists within Serrano ancestral territory. The Tribe does not have any concerns with the implementation of the project, but the YSMN requested that their mitigation measures be included as part of the project permit/planning conditions to reduce potential impacts to TCRs. A response was also received from the Gabrieleño Band of Mission Indians–Kizh Nation indicating that the project is of interest to the tribe. A consultation meeting was scheduled for January 19, 2022, and the results of that meeting included the submittal of the Kizh Nation’s project mitigation measures. The final response the City received was from the Morongo Band of Mission Indians in December

2022, requesting project documents that will assist them in determining if the tribe wants to pursue consultation. To date, the Morongo Band of Mission Indians have not responded after receiving the requested documents.

Historic Aerials

According to the 2022 Phase I Environmental Site Assessment (Phase I ESA) Trucking Yard and Vacant Land Report prepared by The Vertex Companies, LLC, (VERTEX) and review of collected historical information, the project site contained two buildings within the western section of the project site by 1896. A review of 19 historical aerial photographs depicting the project site from 1938 to 2020 indicate that from the earliest aerial in 1938 the project site was utilized for agricultural purposes and contained additional residential/agricultural buildings in the northern, central, southwestern portions of the site. Sometime between 1948 and 1959 a homestead was constructed in the eastern portion of the project site; however, the land surrounding the project area remained undeveloped and was used for agricultural purposes. From 1959 to the mid-1970s the project site experienced gradual changes with the removal of buildings on the southwestern section of the property, and the addition of residential buildings throughout the northern section of the project site. By 1988, the maintenance and office building were constructed in the central section of the property. Sometime between 1978 and 1994, the areas surrounding the project site became more urbanized and residential and industrial development was prevalent throughout the City. By 2002, the original structures appear to be replaced by commercial and industrial buildings, and by 2008 the buildings within the central and southern sections of the property were remodeled with the present improvements. In 2016 the residential buildings within the northern section of the project were demolished and remain vacant. The property was occupied by several companies throughout the years. In the 1990s it was occupied by Allied Heavy Moving, Inc., the Mon May Enterprises in 2000, the Bloomington Lumber in 2005, and the Alliance Shipper, Inc. in 2018 to present. Aerials from 1994 to 2020 exhibit the progressive development of the area.

Pedestrian Survey

On August 26, 2022, FCS Osteologist/Staff Archaeologist Kweku A. Williams, MA, RPA conducted a pedestrian survey for unrecorded cultural resources at the project site. The survey covered the subject property where possible, beginning at the northern boundary which runs parallel to Santa Ana Avenue. The eastern boundary runs parallel to Lilac Avenue. The first transect began in the northeast corner bearing 258 degrees west. All the transects were spaced at 15-meter intervals moving east to west. There was a pre-existing building in a large area toward the southern portion of the project site that was not accessible due to barbed wire fencing and concrete walls enclosing it. Although the area was fenced, visibility of the area was possible and a completely paved area containing a warehouse building and associate structures was observed. The 1-story building also contained a large aluminum access garage located on the western portion of the project site. In the accessible areas, visibility of native soils was high averaging 90 percent across the site. The soil in the northern portion of the project site consisted of gray and brown (10 YR 5/6) silty sand soil, interspersed with quartz cobbles ranging from 2 to 5 centimeters.

Survey conditions were documented using digital photographs and field notes. During the survey, the FCS Osteologist/Staff Archaeologist examined all areas of the exposed ground surface for

prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, toolmaking debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). All areas of the project site were closely inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No historic or prehistoric cultural resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were observed. The surface of the project site was littered with modern debris and garbage.

Buried Site Potential

In addition to the pedestrian survey, the potential for yet-identified cultural resources in the vicinity was reviewed against geologic and topographic geographic information system data for the general area and information from other nearby projects. The proposed project was evaluated against a set of criteria identified by a geoarchaeological overview of the Central Valley that was prepared for Caltrans Districts 6 and 9. This study mapped the “archaeological sensitivity,” or potential to support the presence of buried prehistoric archaeological deposits, throughout the Central Valley based on geology and environmental parameters including distance to water and landform slope. The methodology used in the study is applicable to other parts of California and concluded that sites consisting of flat, Holocene-era deposits in close proximity to water resources had a moderate to high probability of containing subsurface archaeological deposits when compared to earlier Pleistocene deposits situated on slopes or further away from drainages, lakes, and rivers.

The project site consists of undeveloped land (northern portion) and hardscaped commercial development (southern portion). According to the geological map of Morton, the project site is entirely situated upon Holocene alluvium and Pleistocene alluvium. Applying the criteria set forth above, all Holocene-era deposits have the potential to contain archaeological deposits, which increases with the ease of the slope and proximity to a water resource. Although the record search results and pedestrian survey failed to identify the presence of recorded and unrecorded prehistoric and historic resources within the project boundaries, the project site is situated on Holocene alluvium, and it is north of the Santa Ana River. Therefore, the project site has a moderate to high potential for unanticipated buried cultural resources to be impacted by project construction.

Cultural Resources

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

Less than significant impact. The record search conducted at the SCCIC for the project site determined that two historic resources are located within a 0.5-mile radius, and none are within the project site boundaries. As mentioned above, during the August 26, 2022, pedestrian survey, no historic or prehistoric cultural resources or raw materials were observed. The southern portion of the project site currently contains a truck and trailer parking lot and three associated structures. Implementation of the proposed project would involve demolition of the three existing structures

and associated on-site parking areas. As discussed above, historic aerials of the project site indicated that project site's original structures appear to have been replaced by commercial and industrial buildings by 2002, and the buildings within the central and southern sections of the property were remodeled with the present improvements by 2008. Therefore, the three existing structures on the project site are less than 50 years old and thus none of the structures meet the age criterion to be considered potentially historic resources. As such, the proposed construction and ground disturbance would not result in adverse change or cause a loss in significance to a historical resource, therefore a less than significant impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than significant with mitigation incorporated. The record search conducted at the SCCIC for the project site determined that there is one prehistoric resource and two historic resources within the 0.5-mile radius, none are located within the project site boundaries. While not located within the project boundaries, the prehistoric resource is immediately adjacent to the project boundaries. Furthermore, the project site is entirely situated upon Holocene alluvium and Pleistocene alluvium. All Holocene-era deposits have the potential to contain archaeological deposits, which increases with the ease of the slope and proximity to a water resource. The presence of a recorded prehistoric resource immediately adjacent to the project boundaries and its proximity to the Santa Ana River, located approximately 1.7 miles to the southeast, indicates that undiscovered cultural resources may be encountered and impacted by construction activities. Therefore, the project site has a moderate to high potential for unanticipated buried cultural resources to be impacted by project construction. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less than significant level.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant with mitigation incorporated. As discussed above, the project site in its existing state consists of undeveloped land in the northern portion of the site and hardscaped commercial development in the southern portion of the site. A review of 19 historical aerial photographs depicting the project site from 1938 to 2020 indicated that the project site was utilized in the past for agricultural purposes and has contained residential, agricultural, commercial, industrial, and maintenance and office buildings throughout the years and has been occupied by several companies. Therefore, the potential for human remains to be discovered during ground-disturbing activities is low. While it is highly unlikely that the presence of human remains exists within or near the project site, there is always the possibility that subsurface construction activities associated with the proposed project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains.

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. MM CUL-2 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with these guidelines and statutes,

implementation of this mitigation would reduce potential impacts related to human remains to a less than significant level.

Tribal Cultural Resources

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:

- d) **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**

Less than significant impact with mitigation incorporated. A review of the CRHR, local registers of historic resources, a records search conducted at the SCCIC, and an NAHC Sacred Lands File search failed to identify any listed TCRs that may be adversely affected by the proposed project. As described above, letters containing project information requesting any additional information were sent to 17 tribal representatives to obtain additional information regarding TCRs, as identified by the NAHC, on October 25, 2022. Four tribe responses were received and did not provide additional information pertaining to known TCRs; however, should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3 and MM TCR-4 would reduce potential impacts to a less than significant level.

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

Less than significant with mitigation incorporated. Tribal consultation efforts pursuant to AB52 to identify additional significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 were initiated by the City on November 4, 2022. The City received a response from the Yuhaaviatam of San Manuel Nation (YSMN) on November 30, 2022, indicating that the project area exists within Serrano ancestral territory. The Tribe does not have any concerns with the implementation of the project, but the YSMN requested that their mitigation measures be included as part of the project permit/planning conditions to reduce potential impacts to TCRs. A response with a request for consultation was received from the Gabrieleño Band of Mission Indians – Kizh Nation expressing the tribe's interest in the proposed project. A consultation meeting was scheduled for January 19, 2022, and the results of that meeting included the submittal of the Kizh Nation's project mitigation measures. The final response the City received was from the Morongo Band of Mission Indians in December 2022, requesting project documents that will assist them in determining if the Tribe wants to pursue consultation. To date, the Morongo Band of Mission Indians have not responded after receiving the requested documents. If any undiscovered TCRs are encountered during project construction, implementation of MM TCR-1, MM TCR-2, MM TCR-3, and MM TCR-4 would reduce potential impacts to a less than significant level.

Mitigation Measures

MM CUL-1 An Archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards for archaeology to conduct “tailgate” Worker Environmental Awareness Program (WEAP) training for archaeological resources to be attended by all construction personnel directly involved with project-related ground disturbance. The training shall include visual aids, a discussion of applicable laws and statutes relating to archaeological resources, types of resources that may found within the project site, and procedures to be followed in the event such resources are encountered. Additionally, the qualified Archaeologist must be present to monitor the initial clearing and grading of the site to check for the inadvertent exposure of cultural materials. This may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist, but full-time archaeological monitoring is not recommended at this time.

If buried cultural resources are discovered during construction, operations shall stop within a 100 foot buffer of the find and the qualified Archaeologist shall be consulted to determine whether the resource requires further study. Work on the other portions of the project outside of the buffered area may continue during this assessment period. The qualified Archaeologist shall make recommendations to the lead agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) and the Gabrieleño Band of Mission Indians – Kizh Nation shall be notified, as detailed within TCR-1 and TCR-2, 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, to provide Tribal input with regard to significance and treatment.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the Archaeological Monitor and recommended to the lead agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. 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 YSMN and the Kizh Nation for review

and comment, as detailed within TCR-1. The Archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

No further grading shall occur in the area of the discovery until the lead agency approves the recommended, or other equally effective, measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the lead agency where they would be afforded long-term preservation to allow future scientific study.

MM CUL-2 Inadvertent Discovery of Human Remains

In the event of an accidental discovery or recognition of any human remains, Public Resource Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is inadvertent discovery or recognition of any human remains, the following steps shall be taken:

- There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98, or
- Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:
 - The NAHC is unable to identify a Most Likely Descendant, or the Most Likely Descendant failed to make a recommendation within 48 hours after being notified by the Commission;
 - The descendant identified fails to make a recommendation; or
 - The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

MM TCR-1 The Yuhaaviatam of San Manuel Nation Mitigation Measures

- A. The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be notified, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided

information regarding the nature of the find, so as to provide Tribal input with regard 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 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 the project, should YSMN elect to place a monitor on-site.

- B. 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.

MM TCR-2 Kizh Nation Mitigation Measures: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCRs”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by

the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

- E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh Monitor and/or Kizh Archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary Objects

- A. Native American human remains are defined in Public Resources Code 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). The NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for the means of treating, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.
- C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code Section 5097.98(d)(1) and (2).
- D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh Monitor and/or Archaeologist deems necessary) (CEQA Guidelines § 15064.5(f)).
- E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the

Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

- F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM TCR-4 Procedures for Burials and Funerary Remains

- A. If the Kizh Nation is determined to be the Most Likely Descendant (MLD) by the NAHC, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.
- B. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.
- C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations shall either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.
- D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed.
- E. In the event preservation in place is not possible despite good faith efforts by the project applicant/developer and/or landowner, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects.
- F. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on-site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site

but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

- G. The Tribe will work closely with the project's qualified Archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.6 Energy <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report prepared by FCS on November 18, 2022 (Updated May 4, 2023). The report can be found in Appendix A.

Setting

Energy sources include electricity, natural gas, and other fuels. Energy is generally transmitted in the form of electricity, measured in kilowatts or megawatts, or natural gas measured in therms or cubic feet.^{45, 46, 47} Fuel, such as gasoline or diesel, is measured in gallons. Energy usage is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by one degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (1 therm) of natural gas, and a kilowatt-hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

The proposed project would be served with electricity provided by Southern California Edison (SCE) and with gas provided by Southern California Gas (SoCalGas). Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for construction and operation. All supporting information for this section is included in Appendix A.

Would the project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

⁴⁵ 1 kW = 1,000 watts; a watt is a derived unit of power that measure rate of energy conversion. 1 watt is equivalent to work being done at a rate of 1 joule of energy per second. In electrical terms, 1 watt is the power dissipated by a current of 1 ampere flowing across a resistance of 1 volt.

⁴⁶ 1 MW = 1 million watts

⁴⁷ A therm is a unit for quantity of heat that equals 100,000 BTU. A BTU is the quantity of heat required to raise the temperature of 1 pound of liquid water 1 degree Fahrenheit at a constant pressure of 1 atmosphere.

Less than significant impact. A significant impact would occur if the proposed project would result in the wasteful, inefficient, or unnecessary use of energy. Project construction and operation are discussed separately below.

Construction

According to applicant-provided information, the project construction schedule is anticipated to begin in July 2023 and conclude in June 2024. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient, equipment is replaced by newer and cleaner equipment. Project construction would require energy for the manufacturing and transportation of building materials, preparation of the site (e.g., demolition, grading), and the actual construction of the proposed warehouse. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Construction equipment is estimated to consume a total of 40,618 gallons of diesel fuel over the entire construction duration.

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB EMFAC mobile source emission model. The specific parameters used to estimate fuel usage are included in Appendix A. In total, the proposed project is estimated to generate 1,167,383 VMT and consume a combined 78,062 gallons of gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Single-wide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 6,544 kilowatt-hours (kWh) during the approximate 12-month construction duration.

The overall construction schedule and process is already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting, maintaining, and fueling the equipment. Therefore, the opportunities for future efficiency gains during construction are limited. Therefore, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Operation

The proposed project would consume energy as part of building operations and transportation activities. Project energy consumption is summarized in Table 12.

Table 12: Estimated Annual Project Energy Consumption

Energy Consumption Activity	Annual Consumption
Electricity Consumption	823,626 kWh/year
Natural Gas Consumption	614,950 kBTU/year
Total Fuel Consumption	621,166 gallons of gasoline and diesel
Notes: kBTU = kilo-British Thermal Unit kWh = kilowatt-hour Source: Appendix A	

Operation of the proposed project would consume an estimated 823,626 kWh of electricity and an estimated 614,950 kilo-British Thermal Unit (kBTU) of natural gas annually. The proposed project's building would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. These are widely regarded as the most advanced building energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 621,166 gallons of gasoline and diesel annually.⁴⁸ Vehicles utilized during project operation would be subject to applicable State vehicle fuel efficiency standards, which would incrementally improve with each year of project operation. In addition, as the operation of vehicles and consumption of transportation fuels is driven by the cost of business operation, there is an incentive to reduce overall fuel consumption where feasible to reduce operating costs.

Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 164-168, the proposed project would be considered to result in wasteful, inefficient, or unnecessary consumption of energy resources if it would conflict with the following energy conservation goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

Decreasing Overall Per Capita Energy Consumption

The VMT Analysis by Urban Crossroads determined that the proposed project's VMT per employee would be below the City's impact thresholds and therefore less than significant.⁴⁹

Decreasing Reliance on Fossil Fuels

The proposed project would be designed and constructed in accordance with the California Building Standards Code (CBC) energy efficiency standards. For example, the proposed project would install

⁴⁸ Based on the countywide average fuel consumption rate.

⁴⁹ Urban Crossroads. 2022. Lilac Avenue and Santa Ana Avenue Warehouse Vehicle Miles Traveled (VMT) Analysis. July 25.

low-flow plumbing fixtures and high-efficiency light that are compliant with the CBC. CBC energy efficiency standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. Compliance with the CBC would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. As a result, the increase in energy conservation and efficiency would reduce the amount of potentially fossil fuel-sourced electricity consumption, and thereby reducing project reliance on fossil fuels.

Project-related vehicle trips would consume 621,166 gallons of fuel throughout the life of the proposed project resulting from vehicles traveling to and from the project site. This analysis evaluated operational fuel consumption based on the proposed project's operational assumptions. In addition, the proposed project tenant would comply with heavy-duty truck idling limitations as trucks would unload and load goods to avoid fuel waste. Fuel consumption associated with operations of the proposed project would be expected to decrease over time as State programs, such as the ARB's Advanced Clean Trucks Regulation, are implemented and scaled. As noted earlier, this regulation mandates an increasing sales percentage of zero-emissions trucks in California from 2024 to 2035. Other regulations would similarly reduce fuel consumption of the proposed project's trucks and other vehicles. Further, it is worth noting that the project site is in an industrialized area with convenient access to I-10, a rail yard, and a multitude of other warehousing facilities. These factors would likely serve to reduce VMT from the proposed project's truck trips. The project site is also located in a High Quality Transit Area (HQT), meaning that employees would have the opportunity to utilize high quality transit systems for commuting. Thus, the location of the proposed project would help minimize fossil fuel reliance with respect to transportation fuel consumption.

Increasing Reliance on Renewable Energy Sources

The proposed project would be considered to conflict with this criterion if it did not take steps to increase the reliance on renewable energy sources. The proposed project would be required to comply with the applicable electric vehicle (EV) charging infrastructure standards for the development type, such as pre-wiring to facilitate future installation of EV charging stations. As a result, the proposed project would be incrementally increasing overall reliance on renewable energy sources by including on-site renewable energy generation technologies and incorporating EV charging infrastructure to facilitate the future use of EVs.

Conclusion

As energy consumption resulting from construction and operation of the proposed project would not be considered wasteful, inefficient, or unnecessary, this impact is less than significant.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than significant impact. A significant impact would occur if the proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts related to the project's construction and operations are discussed separately below.

Construction

As described above, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. California Code of Regulations, Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. Therefore, the construction phase of the proposed project would not conflict with State or local renewable or energy efficiency objectives. Construction-related energy impacts would be less than significant.

Operation

The proposed project would be served with natural gas provided by SoCalGas. SoCalGas has set a voluntary goal to reduce their own electricity usage. Their energy conservation program seeks to (1) reduce GHG emissions, (2) advance new technologies in energy efficiency and emerging, renewable energy, and (3) lower estimated electricity consumption at company facilities through comprehensive energy efficiency retrofits and incorporation of energy-efficient measures into new construction.⁵⁰ Therefore, the proposed project would be served by a gas company that strives for increased use of renewable energy sources and energy conservation.

The proposed project would be served with electricity provided SCE, which was required to meet California's Renewable Portfolio Standard (RPS) of 33 percent by 2020. SCE's 2020 power mix included 30.9 percent eligible renewable (biomass and waste, geothermal, eligible hydroelectric, solar, and wind), 3.3 percent large hydroelectric, 15.2 percent natural gas, 8.4 percent nuclear and 42.0 percent unspecified sources of power.⁵¹ SCE also offers the SCE Green Rate 50 Percent option, which includes 65.4 percent eligible renewable (geothermal, solar, and wind), 1.6 percent large hydroelectric, 7.6 percent natural gas, 4.2 percent nuclear and 21.0 percent unspecified sources of power, and the SCE Green Rate 100 Percent option, which includes 100 percent eligible renewable (solar). SCE would be required to meet California's RPS of 60 percent by 2030 and carbon-free electricity by 2045.

The proposed project would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, as applicable. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting. The incorporation of the Title 24 standards into the design of the proposed project would ensure that the proposed project would not result in the use of energy in a wasteful manner.

In addition, the proposed project would be consistent with the applicable GHG and air pollution-reducing policies from the City's General Plan, which include various energy efficiency and energy conservation policies. Many of the City's policies therein are specific to the City's actions or programs for the City to implement; however, the proposed project is consistent with or would not

⁵⁰ Southern California Gas Company (SoCalGas). 2021. Sustainability at SoCalGas. Website: <https://www.socalgas.com/ko/taxonomy/term/731> Accessed October 12, 2022.

⁵¹ California Energy Commission (CEC). 2021. 2020 Power Content Label. Website: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label/annual-power-content-1>. Accessed October 11, 2022.

preclude or conflict with any applicable policy of the City's General Plan intended to improve energy efficiency or energy conservation.

Conclusion

As energy consumption resulting from construction and operation of the proposed project would not constitute a conflict with or obstruct a State or local plan for renewable energy or energy efficiency, this impact is less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.7 Geology and Soils <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Environmental Evaluation

The analysis in this section is based, in part, on the Geotechnical Investigation prepared by Southern California Geotechnical (SoCalGeo) on June 1, 2022 and the Paleontological Records Search (PRS) conducted by Dr. Kenneth Finger on August 3, 2022. The Geotechnical Investigation and PRS can be found in Appendix D.

Setting

Geotechnical Investigation

SoCalGeo prepared a Geotechnical Investigation for the proposed project on June 1, 2022. SoCalGeo conducted a subsurface exploration at the site consisting of six borings advanced to depths of 15 to 25± feet below the existing site grades. Asphaltic Concrete (AC) pavements were encountered at the ground surface at Boring numbers B-4 and B-5. The pavement sections at these locations consist of 2 to 2.5± inches of AC, underlain by 0 to 4± inches of aggregate base.

Artificial soils were encountered at the ground surface of all boring locations except for Boring No. B-1 extending to depths ranging from 3 to 5.5± feet below existing site grades. The artificial soils consist of loose to medium dense silty fine to coarse sands, and loose silty fine sands. Medium dense gravelly fine to coarse sands and fine to coarse sands were also observed in the fill strata. The fill soils possess a disturbed appearance, resulting in the classification of artificial fill.

Native alluvium was encountered at the ground surface at Boring number B-1 and beneath the artificial fill soils at all of the other boring locations, extending to at least the maximum explored depth of 25± feet below the existing site grades. The native alluvial soils consist of dense to very dense silty fine to coarse sands and medium dense to very dense gravelly fine to coarse sands and fine to coarse sands. A medium dense fine sandy silt layer was encountered at Boring number B-5 at a depth of 5 feet at a depth of 24± feet below site grades.

Groundwater was not encountered during the drilling of any of the borings. Based on the lack of water within the borings and the moisture content of the recovered soil samples, the static groundwater table is considered to have existed at a depth in excess of 25± feet below existing site grades at the time of the subsurface investigation. Results of the laboratory testing for the boring samples can be found in the Geotechnical Investigation in Appendix D.

The Geotechnical Investigation determined that the site is not located within an Alquist-Priolo Earthquake Fault Zone. SoCalGeo did not identify any evidence of faulting during the Geotechnical Investigation, and therefore the possibility of significant fault rupture on the site is considered to be low. Furthermore, other geologic hazards such as seismically induced settlement, lateral spreading, tsunamis, inundation, seiches, flooding, and subsidence affecting the site is considered low. It was determined that the proposed project is considered feasible from a geotechnical standpoint.

Paleontological Records Search

Dr. Kenneth Finger conducted a PRS for the proposed project on the University of California Museum of Paleontology (UCMP) database. The results were provided to FCS on August 3, 2022. The results indicated that the surface of the site is on Holocene alluvium and Pleistocene alluvium. The project site also includes alluvium of indeterminate age, older Holocene alluvium, and Holocene-Pleistocene dune sands.

A PRS of the UCMP database focused on the Pleistocene of San Bernardino County. It revealed 47 Pleistocene vertebrate localities in, all in the late Pleistocene Matrix Formation of the Mojave Desert; none is within 30 miles of Rialto. In addition, there is one UCMP Pleistocene plant locality at the

Searles Lake paleoshoreline, which is also quite distant from this project site. A records search of the database of the Natural History Museum of Los Angeles County (NHM) revealed four Pleistocene vertebrate localities recorded in the Chino-Corona area, which is more than 15 miles east of Rialto (Bell, 2020). A third records search on the San Bernardino County Museum (SBCM) database would likely reveal many more Pleistocene localities in the region, including the southwestern part of the County (south of the Mojave Desert).

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less than significant impact. As mentioned above, the Geotechnical Investigation determined that the site is not located within an Alquist-Priolo Earthquake Fault Zone. SoCalGeo did not identify any evidence of faulting during the Geotechnical Investigation, and therefore the possibility of significant fault rupture on the site is considered to be low. Furthermore, the proposed project would be required to adhere to all requirements of the most recent California Building Standards Code (CBC) for reducing seismic hazards. With adherence to these requirements, impacts related to the rupture of a known earthquake fault would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. The project site is located in Southern California, and would therefore be subject to strong ground shaking associated with seismic activity. The nearest fault to the project site is the San Jacinto Fault, located approximately 2.37 miles northeast. An unnamed fault near Fontana is located approximately 2.30 miles northwest of the site.⁵² Because of the proximity of these faults to the site, there is potential for strong seismic ground shaking. As mentioned above, the proposed project would be required to adhere to all requirements of the most recent CBC for reducing seismic hazards. Furthermore, adherence to the measures listed under MM GEO-1 would ensure that impacts related to strong seismic ground shaking are reduced to a less than significant level through adequate design of the project. Therefore, with implementation of MM GEO-1, impacts would be less than significant with mitigation incorporated.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or

⁵² United States Geological Survey (USGS). 2022. U.S. Quaternary Faults. Website: <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>. Accessed July 7, 2022.

exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and grain size characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. According to the Geotechnical Investigation, liquefaction is not considered to be a design concern for the proposed project.⁵³ Therefore, impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

Less than significant impact. The project site is located in a flat area surrounded by existing development and vacant land. There are no steep slopes surrounding the project site. Therefore, the project is not subject to landslides and impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Less than significant impact. Construction activities such as clearing, grading, and excavation could disturb surface soils and make them vulnerable to wind and precipitation, which could lead to soil erosion. projects that disturb one or more acres of soil are required to obtain a General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit), issued by the California State Water Resources Control Board (State Water Board). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) that the proposed project will implement to control erosion and prevent the conveyance of sediments off-site. Implementation of the conditions of the Construction General Permit would reduce erosion impacts resulting from proposed construction to less than significant levels.

During project operation, the proposed project would include new impervious surfaces and landscaping that would minimize soil exposure and erosion risks at the site. The proposed project would be required to submit a Storm Water Quality Management Plan (SWQMP) for review and approval by the City, as outlined in Section 12.60.260 of the Rialto Municipal Code.⁵⁴ The SWQMP would include all BMPs that the proposed project would incorporate to control stormwater and non-stormwater pollutants during and after construction. Therefore, impacts related to substantial soil erosion and the loss of topsoil would be less than significant.

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?

Less than significant impact with mitigation incorporated. As mentioned above, the Geotechnical Investigation determined that geologic hazards such as liquefaction, seismically induced settlement, lateral spreading, subsidence affecting the site is considered low, and that the proposed project is

⁵³ Southern California Geotechnical (SoCalGeo). 2022. Geotechnical Investigation. June.

⁵⁴ City of Rialto. 2022. Rialto Municipal Code. Storm Water Quality Management Plan (SWQMP). Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT12PUUT_DIV3ST_CH12.60MUSESTSESYMS_ARTVCO_RE_12.60.260STQUMAPLSW. Accessed July 7, 2022.

considered feasible from a geotechnical standpoint. There are no steep slopes on or near the site, therefore the likelihood of on- or off-site landslide is low. Adherence to the requirements of MM GEO-1 would further reduce impacts associated with these hazards. As such, impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than significant impact. Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support. The Geotechnical Investigation found that the near-surface soils of the site consist of gravelly sands, sands, and silty sands with no appreciable clay content. Based on the results of the expansion index testing, these materials have been classified as non-expansive. Therefore, the proposed project would not be located on expansive soil and impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less than significant impact. The project site currently utilizes septic systems. Wastewater discharges are directed to septic systems that are connected to the office and storage buildings. The septic systems are serviced by an outside contractor every 3 to 4 months, as needed. No concerns have been identified related to the current septic systems.⁵⁵ Although the site currently contains a septic system, the proposed project would connect into and discharge wastewater to an existing public sanitary sewer main located in Lilac Avenue. Therefore, the proposed project does not propose the use of septic tanks or alternative wastewater disposal systems. As such, impacts would be less than significant.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant impact with mitigation incorporated. The PRS results did not recommend a paleontological walkover survey because the surface of the site is heavily disturbed. The surficial and sub-Qya Pleistocene layer (Qoa or Qds), however, would be disturbed by construction-related earth-disturbing activities. If Pleistocene, that unit has a low potential but high sensitivity for significant paleontological resources. An SBCM records search would provide for a more accurate assessment. While paleontological walkover survey was not recommended, the results required the diversion and assessment of any identified paleontological resources unearthed during construction, as described under MM GEO-2 below. With the adherence to the requirements of MM GEO-2, the proposed

⁵⁵ The Vertex Companies, LLC (VERTEX). 2022. Phase I Environmental Site Assessment. May 9, 2022

project would not directly or indirectly destroy a unique paleontological resources or site or unique geologic feature. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM GEO-1 Adherence to All Geotechnical Investigation Design Considerations

The project applicant shall implement all measures included in the Geotechnical Investigation related to general design, settlement, shrinkage, subsidence, grading, construction, foundation design and construction, floor slab design and construction, retaining wall design and construction, and pavement design during construction.

MM GEO-2 Inadvertent Discovery of Paleontological Resources During Construction

Should any significant paleontological resources (e.g., bones, teeth) be unearthed by the construction crew, their activities shall be diverted at least 15 feet from the find until a professional paleontologist has assessed it and, if deemed significant, salvaged promptly. Salvaged fossils shall be deposited in an appropriate repository, such as the University of California Museum of Paleontology (UCMP), where they will be properly curated and made available for future research.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.8 Greenhouse Gas Emissions <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☒	☐	☐

Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Analysis Report prepared by FCS on November 18, 2022 (Updated May 4, 2023). The report can be found in Appendix A.

Setting

Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to the way a greenhouse retains heat. Common GHGs include water vapor, CO₂, methane (CH₄), nitrous oxide, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, ozone, and aerosols. Natural processes and human activities emit GHGs. The presence of GHGs in the atmosphere affects the Earth's temperature. Emissions from human activities, such as electricity production and vehicle use, have elevated concentrations of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Individual GHG compounds have varying global warming potential and atmospheric lifetimes. The global warming potential is the potential of a gas or aerosol to trap heat in the atmosphere. To describe how much global warming a given type and amount of GHG may cause, the CO₂ equivalent (CO₂e) is used. The calculation of CO₂e is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent reference gas, CO₂. For example, CH₄'s warming potential of 25 indicates that CH₄ has 25 times greater warming effect than CO₂ on a molecule-per-molecule basis. A CO₂ equivalent is the mass emissions of an individual GHG multiplied by its global warming potential. As described in Appendix A, the GHGs defined by AB 32 include CO₂, CH₄, nitrous oxide, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. A seventh GHG, nitrogen trifluoride, was added to Health and Safety Code Section 38505(g)(7) as a GHG of concern.

Thresholds of Significance

The project site is within the SoCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the air basin in 2008. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document—Interim CEQA GHG Significance Threshold (Interim GHG Thresholds) that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. In 2010, the SCAQMD Tier 3 threshold was expanded to include non-industrial projects, as explained in the minutes from the most recent working group meeting.⁵⁶ The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold.

The SCAQMD currently recommends a 10,000 MT CO₂e per year GHG emission threshold for industrial projects for which it is the lead agency. However, the City of Rialto has instead selected the SCAQMD's more stringent draft 3,000 MT CO₂e per year threshold for assessment of the proposed project's GHG emissions.

To be consistent with State goals detailed in Senate Bill (SB) 32, Executive Order B-30-15, and Executive Order S-3-05 to reduce GHG emissions by 40 percent below 1990 levels by 2030, a scaled screening GHG threshold can be developed for the anticipated proposed project operational year of 2024. This scaled threshold builds on, and accelerates the attainment of, the targets included in AB 32. Though the SCAQMD has not published a quantified threshold beyond 2020, a threshold of 2,520 MT CO₂e per year would be the appropriate scaled GHG threshold for the buildout year of 2024 based on the GHG reduction goals of SB 32 and Executive Order B-30-15. This is calculated as: $2,520 = 3,000 - ((2024 - 2020) * \{[3,000 - 3,000 * (1 - 40\%)] / 10\})$. This threshold is applied to evaluate Impact 2.8(a).

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less than significant impact with mitigation incorporated. GHG emissions from construction and operations of the proposed project are evaluated below.

Construction Emissions

The proposed project would generate GHG emissions during construction activities resulting from emission sources such as construction equipment, haul trucks, and construction worker vehicles. Although these emissions would be temporary and short-term in nature, they could represent a

⁵⁶ South Coast Air Quality Management District (SCAQMD). 2010. Greenhouse Gas CEQA Threshold Stakeholder Working Group Meeting #15. September 28. Website: www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/ghgmtg15-web.pdf. Accessed November 9, 2022.

substantial contribution of GHG emissions. Construction emissions were modeled using CalEEMod Version 2020.4.0.

Table 13 presents the proposed project’s total construction emissions, which are amortized over the assumed lifetime of the project (30 years) and added to annual operational emissions.

Table 13: Estimated Construction-Related Greenhouse Gas Emissions

Construction Activity	Total GHG Emissions (MT CO ₂ e per year)
Demolition (2023)	55
Grading (2023)	343
Building Construction (2023)	250
Building Construction (2024)	400
Architectural Coating (2024)	13
Paving (2024)	21
Frontage Improvements (2024)	32
Total Project Construction	
Total Construction GHG Emissions	1,115
Amortized Construction GHG Emissions (30 years) ¹	37
Notes: GHG = greenhouse gas MT CO ₂ e = metric ton carbon dioxide equivalent Emissions may not add up due to rounding. ¹ Construction GHG emissions are amortized over the anticipated 30-year lifetime of the project. Source: Appendix A.	

Operational Emissions

Operational or long-term emissions occur over the life of the project. Project operations were modeled for the 2024 operational year, following the completion of construction. Sources for operational emissions are summarized below. Sources for operational GHG emissions include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Area Sources:** These emissions refer to those produced during activities such as landscape maintenance.

- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

Table 14 presents the estimated annual GHG emissions from the proposed project's operational activities. As shown in Table 14, the proposed project would generate approximately 5,845 MT CO₂e per year after the inclusion of 37 MT CO₂e per year from project construction.

Table 14: Estimated Operations-Related Greenhouse Gas Emissions

Emission Source	Total GHG Emissions (MT CO ₂ e per year)
Project Operation	
Area	<1
Energy	180
Mobile	802
Mobile—Trucks	4,423
Stationary	1
Waste	142
Water	260
Amortized Construction Emissions ¹	37
Total Project Operational GHG Emissions	5,845
Adjusted SCAQMD GHG Threshold	2,520
Emissions Exceed Threshold?	Yes
Notes: MT CO ₂ e = metric tons carbon dioxide equivalent ¹ Construction GHG emissions are amortized over the anticipated 30-year lifetime of the project. Source: Appendix A.	

As shown in Table 14, the proposed project operations are estimated to result in an annual GHG emissions inventory of approximately 5,845 MT CO₂e. As discussed, the adjusted significance threshold for the proposed project, which is based on the SCAQMD's draft 3,000 MT CO₂e threshold, is 2,520 MT CO₂e per year. Therefore, without mitigation, this would be considered a potentially significant impact. To reduce the proposed project's annual GHG emissions to below this threshold, Mitigation Measure (MM) GHG-1 is required, which stipulates that the project applicant shall purchase carbon credits or offsets in an amount sufficient to offset the proposed project's annual GHG emissions to below the 2,520 MT CO₂e threshold of significance. Based on the current estimate of the proposed project's annual GHG emissions inventory, shown in Table 14, this would be equivalent to no less than 3,325 MT CO₂e per year for the first 30 years of proposed project operations, or 99,750 MT CO₂e total. Implementation of MM GHG-1 would offset the impact of the

proposed project's GHG emissions to below the 2,520 MT CO₂e per year threshold of significance and therefore result in a less than significant impact.

Conclusion

After implementation of MM GHG-1, the project's construction and operational GHG emissions would not result in a significant impact on the environment and impacts would be less than significant with mitigation incorporated.

b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than significant impact with mitigation incorporated. This impact is addressed by assessing the proposed project's consistency with the applicable measures, policies, and strategies contained in the ARB's 2017 Scoping Plan, ARB's 2022 Scoping Plan, and the SCAG 2020-2045 RTP/SCS. A consistency analysis for each of these plans is presented below.

2017 Scoping Plan

The 2017 Scoping Plan summarizes key policies that contribute to GHG reduction. Table 15 provides an analysis of the proposed project's consistency with the applicable 2017 Scoping Plan measures.

Table 15: 2017 Scoping Plan Consistency

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	Not applicable. This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	Not applicable. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The proposed project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the project site would benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	Not applicable. This measure applies to vehicle manufactures and does not apply to individual development projects. Nonetheless, implementation of this measure over time would serve to further reduce the proposed project's GHG emissions as ZEVs increase their numbers within Statewide fleets.

2017 Scoping Plan Update Reduction Measure	Project Consistency
Sustainable Freight Action Plan The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero-emission operation and maximize near zero-emission freight vehicles and equipment powered by renewable energy by 2030.	Not applicable. This measure calls upon State agencies and regulators to implement recommendations of the California Sustainable Freight Action Plan. The proposed project's future warehouse users may be subject to, or influence by, future implementation of these recommendations.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	Not applicable. This measure revolves around ARB's SLCP Reduction Strategy that was released in April 2016 as a result of SB 650. SB 650 required the State to develop a strategy to reduce emissions of SLCPs. DPM reductions have come from strong efforts to reduce on-road vehicle emissions. Car and truck engines used to be the largest sources of anthropogenic black carbon emissions in California, but the State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years. These policies are based on existing technologies.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	Not applicable. The proposed project does not include the development of a Regional Transportation Plan.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	Not applicable. The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the Governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	Not applicable. The project site is in a built-up area and would not be considered natural or working lands.
Source: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf . Accessed October 12, 2022.	

As discussed in Table 15, the proposed project would not conflict with any applicable 2017 Scoping Plan Update measures.

2022 Scoping Plan

The 2022 Scoping Plan addresses the recent signing of AB 1279, which codified Executive Order B-55-18's target for California to achieve and maintain carbon net neutrality by 2045 (equivalent to a reduction in Statewide anthropogenic GHG emissions of 85 percent below 1990 levels). The 2022 Scoping Plan establishes a scenario by which the State may achieve this goal by 2045 or earlier.

The 2022 Scoping Plan reaffirms and clarifies the role of local governments in achieving the State's climate goals, particularly as it concerns the approval of new land use development projects and their environmental review under CEQA. In other words, the 2022 Scoping Plan considers these approaches to evaluate whether a project may have a less than significant impact on GHG emissions.

The first approach involves consistency with a GHG reduction plan, such as a CEQA-qualified Climate Action Plan (CAP). However, the City of Rialto has not developed such a CAP. Therefore, this approach is not applicable to the proposed project.

The second approach involves determining whether a project would result in net-zero GHG emissions. However, the 2022 Scoping Plan acknowledges that this approach may not be appropriate or even feasible for every project. Therefore, since the proposed project would not result in net-zero GHG emissions, this approach is not applicable to the proposed project.

The third approach involves assessing a project's consistency with key project attributes that have been demonstrated to reduce operational GHG emissions while advancing fair housing. Although the proposed project is not residential in nature, an evaluation of the project's consistency with the 2022 Scoping Plan by assessing the project's consistency with key project attributes identified in the 2022 Scoping Plan remains a valid approach. An evaluation of the project's consistency with the Scoping Plan serves as a roadmap for evaluating a project's current design, and to determine whether it complies with current policies and planned reduction measures for GHG emissions. The comparison of a project design to Scoping Plan proposals is not by itself a metric for determining project-level significance, but a step in showing how the project supports current regulations and is aligned with future GHG reduction strategies in development stages.

Table 16 presents the project's consistency with the 2022 Scoping Plan.

Table 16: Proposed Project Consistency with 2022 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Scoping Plan Measure	Project Consistency
Light-Duty Vehicles: Smart Growth/Reduce Vehicle Miles Traveled. VMT per capita reduced 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	Consistent. As described in the project-specific Traffic Analysis, ⁵⁷ the proposed project would result in 13.8 VMT per employee, which is an 18.34 percent reduction compared to the threshold of 16.9 VMT per employee. As such, the proposed project would not conflict with this measure. Furthermore, the Scoping Plan does not rely upon on VMT reductions from the freight and truck transportation sector.

⁵⁷ Urban Crossroads. 2023. Santa Ana and Lilac Warehouse Traffic Analysis. April 19, 2023.

Scoping Plan Measure	Project Consistency
Deploy ZEVs. Medium-Heavy and Heavy Heavy-Duty Trucks. This measure is supported by Executive Order N79-20 and plans in the AB 74 ITS Report: 100 percent of MD/HDV sales are ZEV by 2040.	Consistent with mitigation. Medium-heavy and heavy heavy-duty trucks would be compliant with truck Fuel Economy Standards: California Phase II GHG Standards and would transition to ZEV by 2045. Infrastructure for the proposed project would be required to support this transition to ZEV; as such, MM GHG-2 and MM GHG-3 are required to demonstrate consistency with this measure. The proposed project would implement MM GHG-2, which would require the project to include infrastructure for electric vehicle charging stations. MM GHG-3 would limit emissions from Transport Refrigeration Units (TRUs) entering the project site if cold storage uses are contemplated in the future. The project does not currently propose cold storage use.
Decarbonize buildings. All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed Statewide by 2030.	Consistent. The proposed project is consistent with the AB 197 commercial timeline. CALGreen measures for 2022 require rooftop solar photovoltaic system with battery storage for warehouses and heat pumps for office space in warehouses consistent with decarbonization strategies.
Low Carbon Fuels for Transportation. Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Consistent. Off-road construction equipment would utilize renewable diesel in compliance with the In-Use Off-Road rule. On-road diesel trucks would also utilize these fuels consistent with the LCFS.
Low Carbon Fuels for Fuels for Buildings and Industry. In 2030s renewable natural gas (RNG) blended in pipeline, ramping up to 2040. Dedicated hydrogen pipelines constructed to serve certain industrial clusters	Consistent. Natural gas utilized by the proposed project would contain this RNG blend as implemented by the Scoping Plan and the energy providers.
Coordinate supply of liquid fossil fuels with declining CA fuel demand. Phase-out oil and gas extraction operations by 2045. Carbon Capture and Sequestration (CCS) on majority of petroleum refining operations by 2030. Interim goals are to reduce petroleum production reduced in line with its demand.	Not applicable. The proposed project is not related to the petroleum industry.
Generate clean electricity. Electric sector GHG target of 38 MMTCO ₂ e in 2030 and 31 MMTCO ₂ e7 in 2045. This GHG target is determined to meet the loads associated with the scenario and corresponds to meeting the 2021 SB 100 Joint Agency Report's 100 percent of retail sales with eligible renewable and zero-carbon resources definition.	Not applicable. The proposed project would benefit indirectly from these goals; however, there are no actions related to the project itself.
Decarbonize industrial energy supply. Electrification goals by industry sector specific to Food Industry, Agriculture, and Chemical and Allied Products and Pulp and Paper Industry for milestone years 2030	Consistent. Construction equipment used for the proposed project would comply with ARB off-road regulations meeting milestones for electrification as required by regulations as promulgated. Starting in

Scoping Plan Measure	Project Consistency
and 2045. Other Industrial Manufacturing: 0 percent energy electrified by 2030 and 50 percent by 2045. Construction Equipment: 25 percent energy demand electrified by 2030 and 75 percent by 2045. Retire all combined heat and power facilities by 2040.	2024, amendments to the off-road In-Use Diesel Rule require use of renewable diesel consistent with the 2022 Scoping Plan and implementing the LCFS. Other portions of this measure are not applicable to the proposed project.
Reduce non-combustion emissions. This involves two strategies targeting methane and HFCs. • Increase capture of methane and from landfill and dairy digester and from the oil and gas infrastructure components. • Introduction of Low GWP refrigerants introduced as building electrification increases mitigating HFC emissions.	Consistent. The proposed project would not include cold storage; however, refrigerants may be used for space cooling. The proposed project would use low GWP refrigerants consistent with current California Significant New Alternatives Policy (SNAP) regulations.
Compensate for remaining emissions. This measure uses Carbon Dioxide Removal (CDR) to compensate for remaining emissions.	Not applicable. This measure relates to remaining emissions and is not applicable at the individual project level.
Source: California Air Resources Board (ARB). 2022. Scoping Plan for Achieving Carbon Neutrality. November.	

As evaluated in Table 16, the proposed project would comply with all regulations adopted to further the Scoping Plan to the extent required by law and to the extent that they are applicable to the project. MM GHG-2 and MM GHG-3 are required to ensure that the proposed project would not hinder the future transition to ZEV trucks. As such, the proposed project would not conflict with the applicable Scoping Plan measures with implementation of MM GHG-2 and GHG-3.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

In September 2008, former Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning efforts for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger VMT and trips, all for the purpose of meeting ARB-determined regional GHG emissions reduction targets. The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and is tasked with addressing regional issues related to transportation, the economy, community development, and the environment.

ARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 2018. Adopted on September 3, 2020, SCAG's latest long-range plan, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS or "Connect SoCal"), serves as the roadmap for fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and it

acknowledges how this relationship can help the regional make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for all people across the region.

The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and buildout the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040. HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the EPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and Statewide benefits including reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, which would reduce automobile use and—crucially—associated GHG emissions.

As noted, implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita by 5 percent by 2045. Generally, projects are considered consistent with the provisions and policies of applicable land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new, dense housing and/or job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Development of the proposed project would be consistent with this land use pattern and related smart growth policies to increase housing density within HQTAs. By developing a project with job growth opportunities in an infill location, surrounded by similar industrial uses, that is also within a HQTA, the proposed project would contribute directly to the goals of the 2020-2045 RTP/SCS. The proposed project is appropriately located and supports the 2020-2045 RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in an effort to reduce VMT and related GHG emissions.

Conclusion

Considering the above consistency analysis, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions with implementation of MM GHG-2 and MM GHG-3. Therefore, impacts are considered less than significant after incorporation of mitigation.

Mitigation Measures

MM GHG-1 Prior to the issuance of any certificate of occupancy for the proposed project, the project applicant shall provide the City with documentation, to the City's satisfaction, that demonstrates verifiable purchases of carbon credits in an amount sufficient to offset the proposed project's greenhouse gas emissions beyond the adopted significance threshold of 2,520 metric tons (MT) carbon dioxide equivalent (CO₂e) per year for the first 30 years of project operations. This would be equivalent to no less than 3,325 MT CO₂e per year or 99,750 MT CO₂e total, based on current estimates of the proposed project's annual greenhouse gas (GHG) emissions inventory.

All purchased carbon credits shall be pursuant to the following performance standards and requirements: (i) the carbon credits shall achieve real, permanent, quantifiable, verifiable, enforceable, and additional reductions as set forth in California Health and Safety Code Sections 38562(d)(1) and (d)(2). Such credits shall be based on protocols consistent with the criteria set forth by Section 95972, subdivision (a), of Title 17 of the California Code of Regulations, as determined by an expert qualified to make such a determination, and shall not include credits originating outside of California, except to the extent that the quality of the credits and their sufficiency under the standards set forth herein, can be verified by an expert qualified to make such a determination.

As an alternative to purchasing carbon credits, the project applicant may elect to contribute to carbon offsets through a local or regional program or institution in an amount sufficient to offset the proposed project's GHG emissions by the previously identified amounts. Contributions to a local or regional program or institution may include, but are not limited to, funding for renewable energy infrastructure or technologies beyond what would otherwise be required for compliance with existing laws and regulations. Carbon offsets, expressed in an amount of MT CO₂e per year, realized due to contributions made by the project applicable for this purpose shall reduce the required MT CO₂e reductions contained in this mitigation by an equal amount and be pursuant to the following performance standards and requirements: (i) the carbon offsets shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions as set forth in California Health and Safety Code Sections 38562(d)(1) and (d)(2); and (ii) one carbon offset shall mean the past reduction or sequestration of one MT CO₂e that is "not otherwise required" (CEQA Guidelines Section 15126.5(c)(3)).

MM GHG-2 Prior to the issuance of a building permit, the City of Rialto Planning Department shall confirm that the project is designed to include the following:

The buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for the future installation of electric vehicle (EV) truck charging stations on the site. Conduit should be installed from the

electrical room to tractor trailer parking spaces in a logical location(s) on the site determined by the project applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available and the buildings are being served by trucks with electric-powered engines.

- MM GHG-3** Warehouse usage shall be limited to dry storage. If the warehouse is used for cold storage, then prior to the issuance of occupancy permits, the Planning Department shall confirm that tenant lease agreements include contractual language that requires all Transport Refrigeration Units (TRUs) entering the project site be plug-in capable. Electrical hookups shall be provided as part of the tenant improvements for any tenant that requires cold storage. The electrical hookups shall be provided at loading bays for truckers to plug in any onboard auxiliary equipment and power refrigeration units while their truck is stopped.

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

Environmental Evaluation

The analysis in this section is based, in part, on the Phase I ESA prepared by VERTEX on May 9, 2022. The Phase I ESA can be found in Appendix E.

Setting

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic—causes human health effects
- Ignitable—has the ability to burn
- Corrosive—causes severe burns or damage to materials
- Reactive—causes explosions or generates toxic gases

Hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. California Code of Regulations, Title 22, Sections 66261.20–24 contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Phase I ESA

VERTEX prepared a Phase I ESA to determine whether Recognized Environmental Conditions (RECs) were present within the project site. A REC refers to (1) the presence or likely presence of any hazardous substances or petroleum products in, on, or at the project site due to a release to the environment, (2) the likely presence of hazardous substance or petroleum products in, on, or at the project site due to a release or likely release to the environment, or (3) the presence of hazardous substances or petroleum products in, on, or at the project site under conditions that pose a material threat of a future release to the environment.

Based on VERTEX's review of historical information, it appears that the subject property was developed with two buildings on the west section of the subject property by 1896. By 1931, the subject property was used for agricultural uses, with additional residential/agricultural buildings developed on the north, central and southwest sections of the subject property from the late 1940s until the late 1950s. Past agricultural use is not considered a REC. By the mid-1970s, the buildings on the southwest section of the subject property were removed and additional residential buildings were developed on the north section of the subject property and agricultural land on the south section of the subject property. The office and maintenance building were developed on the central section of the subject property and additional residences developed on the north section of the subject property in 1988. By 2008, the central and south sections of the subject property were developed with the present improvements. By 2016, the residences on the north section of the subject property were removed and the land left vacant. The subject property was occupied by Allied Heavy Moving Inc in the 1990s, Mon May Enterprises Inc in 2000, Bloomington Lumber by 2005, and Alliance Shippers Inc from at least 2018 to present. No RECs were identified in connection with the historical use of the subject property.

VERTEX's regulatory database review included a search of State and federal regulatory databases to identify environmental concerns for the project site and surrounding properties. The project site address under the business name Monmay Enterprises was listed on the Facility and Manifest Data (HAZNET) and Hazardous Waste Tracking System (HWTS) databases for the disposal of unspecified

oil-containing waste in 2001. Based on the nature of the listing, type of waste and lack of reported releases, this is not a REC in connection with the project site.

The project site address under the business name Bloomington Lumber Co. Inc. was listed on the HWTS database in 2008 as a hazardous waste transporter. Based on the nature of the listing and lack of reported releases, this is not a REC in connection with the project site.

The project site address under the business name Alliance Shippers Inc was listed on the Resource Conservation and Recovery Act, Former Hazardous Waste Generators/No Longer Regulated Sites (RCRA NonGen/NLR) database for being a non-generator or no longer regulated generator of hazardous waste in 2012, and no violations were found. Based on the nature of the listing and lack of reported releases, this is not a REC in connection with the project site.

The project site address under the business name Alliance Shippers Inc was listed on the Registered Waste Tire Haulers Listing (HAULERS) database for having an active status. Based on the nature of the listing and lack of reported releases, this is not a REC in connection with the project site.

The project site address under the business name Alliance Shippers Inc was listed on the aboveground storage tank (AST) and CERS TANKS database for having permitted ASTs at the subject property. Violations were noted in 2015, 2018, and 2021 that were returned to compliance. Based on the nature of the listing and lack of reported releases, this is not a REC in connection with the project site. The project site currently utilizes septic systems. Based on VERTEX's observations as industrial operations began in the late 1980s under increased regulatory scrutiny, the presence of the septic systems is not considered a REC. No concerns were identified with the current septic systems. Furthermore, as mentioned previously, the proposed project would remove the existing septic systems and connect to an existing sewer line in Lilac Avenue.

The project site is located in an area comprised of light industrial and residential development. Review of readily available historical information reveals that the surrounding properties were primarily vacant land prior to 1896. By 1931, the adjoining properties were agriculturally developed, with a building developed on the northwest adjoining property. Additional buildings were developed on the south adjoining property from the late 1940s through the late 1950s. By the late 1970s, residences/agricultural buildings were developed on the southwest adjoining property. The east adjoining property was developed as vacant, graded land by 1985, and by 1994, the north section of the east adjoining property was developed with the present commercial building. By 2002 and 2005, the east and southeast adjoining properties were developed with the present commercial buildings and the west adjoining property was developed with a residential neighborhood. By 2009, the north adjoining property was developed with the current commercial building. No environmental concerns were identified with respect to current or past use of adjoining properties

VERTEX's regulatory database review identified off-site facilities within the American Society of Testing and Materials (ASTM) search distances of the project site. Based on distance, apparent gradient relationship, regulatory status, and/or other facility-specific characteristics, no RECs to the subject property were identified with respect to these off-site facilities.

Alliance Shippers Inc. is currently occupying the project site. Tenant operations include the maintenance and storage of fleet trucks. Significant quantities of petroleum products and hazardous material usage or storage were observed. Hazardous materials observed included one 10,000-gallon red diesel AST and one 1,000-gallon clear diesel AST, which are used for refueling the fleet trucks. The 10,000-gallon AST is double-walled and is staged on concrete paving and the 1,000-gallon AST is placed in secondary containment and staged on concrete paving, both on the central portion of the subject property. A 300-gallon used oil AST, a 100-gallon fresh oil AST, and several 55-gallon steel drums containing used oil filters, parts and antifreeze were all stored on secondary containment staged on asphalt paving in a gated enclosure on the west side of the maintenance building. Additionally, retail-sized janitorial cleaning supplies, which were stored in the maintenance building and in the office. All ASTs and drums were labeled, and no staining or concerns were observed.

Furthermore, based on the date of construction of existing buildings within the project site, it was determined that significant quantities of asbestos-containing materials (ACMs) and lead-based paint (LBP) were unlikely to be present.

Would the project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less than significant impact. The proposed project consists of the construction of a warehouse with associated offices and parking. The proposed project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility that routinely transports, uses, or disposes of hazardous materials. However, proposed construction and operations would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers. During construction, the routine transport of fuels, oils, greases, solvents, and other similar hazardous materials would be required. However, these materials would be contained within vehicles, or would be stored in adequate containers to ensure releases to the environment do not occur. Furthermore, based on the limited term of construction, the small quantities of these substances, and the presence of regulatory oversight, the potential for releases to the environment is minimal. No disposal of hazardous materials on the project site is expected to occur. Additionally, hazardous substances utilized for the construction phase of this development would be maintained in compliance with local and State regulations. If a release were to occur, compliance with these local regulations would ensure impacts to the environment remain less than significant. Therefore, impacts would be less than significant.

- 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?**

Less than significant impact. The proposed project consists of the construction of a warehouse with associated offices and parking. The proposed project does not include any uses or activities that would create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As

mentioned above, the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Contractors would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials, which would minimize potential spill occurrences. Spills that may occur during construction activities would likely be minimal and potential adverse effects would be localized. Plans and specifications typically require contractors to clean up immediately any spills of hazardous materials. The Phase I ESA observed significant amounts of petroleum products and hazardous materials usage or storage on the project site. This includes one 10,000-gallon red diesel AST, one 1,000-gallon clear diesel AST, one 300-gallon used oil AST, one 100-gallon fresh oil AST, and several 55-gallon steel drums containing used oil filters, parts, and antifreeze.⁵⁸ However, as mentioned previously, all ASTs and drums are appropriately labeled, and no staining or concerns were identified.

During operation, hazardous materials would be limited to common materials, including commercial cleaning products, landscaping chemicals and fertilizers, and other substances associated with commercial uses. Additionally, the project would be required to comply with all federal, State, and local laws regulating the management and use of common hazardous materials. The proposed project's compliance with these regulations would ensure that the project would not create a potential hazard to the public through the release of hazardous materials into the environment during operations.

According to the Phase I ESA, based on the date of construction of existing buildings on the project site, it is unlikely that LBP or significant quantities of ACMs are located on the project site. Should ACMs or LBP be discovered during work on the project site, these materials would be handled in accordance with the National Emission Standard for Hazardous Air Pollutants and other applicable local, State, and federal regulations.⁵⁹ Therefore, impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than significant impact. The proposed project is not located within 0.25-miles of a school. The nearest schools to the site are Crestmore Elementary School, located approximately 0.68 miles southwest, and Slover Mountain High School, located approximately 0.83 miles northwest of the site. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a 0.25 mile of an existing or proposed school. As such, impacts would be less than significant.

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?

Less than significant impact. The Phase I ESA prepared by VERTEX for the proposed project conducted a review of regulatory agency databases to determine the presence of hazardous materials on-site. The Phase I ESA found that the project site address was listed under the business

⁵⁸ The Vertex Companies, LLC (VERTEX). 2022. Phase I Environmental Site Assessment. May 9, 2022.

⁵⁹ Ibid.

name Monmay Enterprises on the HAZNET and HWTS databases, under the business name Bloomington Lumber Co on the HWTS database, and under the business name Alliance Shippers Inc on the HAULERS, AST, CERS TANKS, NPDE and California Integrated Water Quality System (CIWQS) databases. However, based on the nature of these listings and the lack of reported releases, these are not RECs in connection with the project site.⁶⁰ Additionally, no environmental concerns or RECs were identified among the six adjoining or immediately surrounding properties. Therefore, the project site is not listed on a hazardous materials site compiled pursuant to Government Code Section 65962.5. As such, impacts would be less than significant.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

Less than significant impact. The proposed project is not located within 2 miles of a public use airport. The nearest airport to the project site is Rialto Municipal Airport, located approximately 4.59 miles north of the site. The San Bernardino International Airport is located approximately 7.41 miles northeast of the site. The project site is not located within the Airport Land Use Compatibility Plan (ALUCP) for Rialto Municipal Airport.⁶¹ Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than significant impact. The City's Emergency Operations Plan (EOP) addresses the City's planned response to emergencies associated with natural disasters and technological incidents.⁶² The proposed project does not include any features that would impact the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

Less than significant impact. According to Exhibit 5.3, Fire Hazards, of the General Plan, the majority of the City, including the project site, is not located within a fire hazard severity zone. Fire zones are predominantly located in the northern part of the City, near the mountains. Furthermore, the CAL FIRE Fire Hazard Severity Zone (FHSZ) Viewer, the project site is not located within a FHSZ.⁶³ Furthermore, the project site is predominantly surrounded by existing development and would

⁶⁰ The Vertex Companies, LLC (VERTEX). 2022. Phase I Environmental Site Assessment. May 9, 2022.

⁶¹ San Bernardino County Airport Land Use Commission. 1991. Final comprehensive Land Use Plan. Rialto Municipal Airport. Website: <http://www.sbcounty.gov/Uploads/lus/Airports/Rialto.pdf>. Accessed July 7, 2022.

⁶² City of Rialto. Emergency Operations Plan (EOP). Website: <https://www.yourrialto.com/DocumentCenter/View/943/Emergency-Operations-Plan-PDF>. Accessed July 7, 2022.

⁶³ California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed June 22, 2022.

adhere to the California Fire Code to reduce hazards related to wildland fires. Therefore, impacts related to wildland fires would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.10 Hydrology and Water Quality				
<i>Would the project:</i>				
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 or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Environmental Evaluation

The analysis in this section is based in part on the Preliminary Water Quality Management Plan (PWQMP) prepared by Kimley-Horn and Associated on July 28, 2022. The PWQMP can be found in Appendix F.

Setting

The City is provided potable water by three providers: the City of Rialto Department of Public Works Water Division, the WVWD, and the Fontana Water Company (FWC). The project site is located in the WVWD's service area.⁶⁴

WVWD operates within a service area of approximately 31 square miles, including portions of the City of Rialto, Fontana, Colton, Jurupa Valley, and unincorporated areas of San Bernardino County. The WVWD utilizes water from five underground basins and treats surface water from Lytle Creek and the State Water Project water at the 14.4-million gallon per day (mgd) Oliver P. Roemer Water Filtration Facility to serve over 20,000 water service connections. The WVWD uses groundwater for approximately 65 percent of its water supply from wells. The WVWD extracts groundwater from five regional groundwater basins: Bunker Hill and Lytle Creek, Rialto-Colton, Riverside North, and Chino Basins.

Would the project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

Less than significant impact. The proposed project has the potential to release water pollutants during construction and operation that may violate water quality standards and degrade surface or groundwater quality. During construction, runoff carrying eroded soils and pollutants could enter storm drainage systems and the Santa Ana River, increasing sedimentation and degrading downstream water quality or seep into the groundwater table. This would represent a potentially significant impact related to surface and groundwater quality.

Under the NPDES General Construction Permit (NPDES No. CAS612008, Order No. R2-2015-0049) process, projects that disturb one or more acres of land, such as the proposed project, are required to obtain a permit before the start of construction activity. As a part of the NPDES General Construction Permit, the proposed project would be required to prepare and implement a SWPPP during construction in accordance with federal and State requirements. The SWPPP would identify structural and nonstructural BMPs intended to prevent erosion during construction. For example, temporary BMPs include temporary dikes, sediment traps, and straw bale that would prevent sediment and other pollutants from leaving the project site in stormwater flows. Although construction activities have the potential to generate increased water pollution and sedimentation, compliance with applicable policies and regulations would minimize the potential to degrade water quality in downstream water bodies to the maximum extent possible. As a result, construction-related project impacts related to surface and groundwater water quality would be less than significant.

Under existing conditions, the project site is primarily comprised of pervious surfaces including dirt, grasses, and vegetation. The proposed project would construct a 297,500-square-foot warehouse

⁶⁴ West Valley Water District (WVWD). 2018. Service Area. Website: <https://wvwd.org/customers/service-information/>. Accessed July 12, 2022.

building with a 3,500-square-foot mezzanine. As a result, new impervious surfaces would be created on-site compared to existing conditions. The proposed project would be subject to Section 12.60.260 of the Rialto Municipal Code, which requires projects to submit a WQMP for review and approval by the City.⁶⁵ According to the Geotechnical Investigation completed for the project site, groundwater was not encountered during the drilling of any of the borings and the groundwater table is considered to exist at a depth in excess of 25 feet below the project site. Groundwater data obtained from a monitoring well approximately 1,445 feet southwest of the project indicate a groundwater level of at least 78 feet below the ground surface.⁶⁶ The PWQCP prepared for the proposed project identifies 10 potential stormwater pollutants, such as sediment, motor oil, or trash, which could enter downstream waterways and degrade surface or groundwater quality. The proposed project includes three underground infiltration basins on-site to capture and fully infiltrate stormwater runoff from the site as well as partially store the 100-year storm runoff volumes. Overflow from the 100-year storm runoff would outlet via storm drainpipe to an existing concrete channel along the south of the property, or overflows into Lilac Avenue through the project site driveway.

The PWQCP identifies several BMPs to control structural and nonstructural sources of potential pollutants. These BMP are required to be incorporated into all new development and significant redevelopment projects. With compliance with the Rialto Municipal Code, implementation of BMPs, and installation of landscaping throughout the site, the project would not violate water quality standards or waste discharge requirements. As such, impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than significant impact. The proposed project would connect to the existing WVWD water supply infrastructure and would not require the use of groundwater wells on-site. As discussed in Section 2.18, Utilities and Service Systems, a majority of the WVWD water supply is drawn from its groundwater wells. While the proposed project would increase the demand for potable water, the proposed project would not significantly reduce water supplies. According to the WVWD 2020 Urban Water Management Plan (UWMP), total projected WVWD water supply for 2030 is 28,791 acre-feet (AF), with 18,691 AF supplied from groundwater sources. Total projected WVWD water supply for 2045 is 34,229 AF, with 24,129 AF supplied from groundwater sources. The WVWD has sufficient supply to meet demand in normal, single-dry, and multiple-dry years scenarios through 2045.⁶⁷ Because the proposed project is consistent with existing General Plan land use designation of Light Industrial it is therefore a planned use and would have been accounted for in the WVWD supply and demand projections detailed in the UWMP as part of the 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan.

⁶⁵ City of Rialto. 2022. Rialto Municipal Code. Chapter 12.60.260 Stormwater Quality Management Plan (SWQMP). Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT12PUUT_DIV3ST_CH12.60MUSESTSESYMS_ARTVCO_RE_12.60.260STQUMAPLSW. Accessed October 26, 2022.

⁶⁶ Southern California Geotechnical (SoCalGeo). 2022. Geotechnical Investigation. June.

⁶⁷ Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. 2020. Part 2: Local Agency UWMPs, Chapter 10.

The proposed project would increase the amount of impervious surfaces on the project site, which could interfere with groundwater recharge. However, as discussed above, groundwater was not encountered during the drilling of borings as part of the Geotechnical Investigation conducted for the proposed project. The groundwater table depth, therefore, is considered to be at least 25 feet below ground and a monitoring well near the project site indicated that groundwater levels were at least 78 feet below the ground surface. Infiltration testing performed at the project site by Southern California Geotechnical indicated infiltration rates between 17.4 and 22.6 inches per hour.⁶⁸ As detailed in the PWQCP, the proposed project would include on-site stormwater infiltration consisting of a below-grade chambers with an infiltration rate of 17.0 inches per hour. These on-site underground chambers would capture runoff from impervious surfaces and the capture volume would be fully infiltrated into the ground. For 100-year storm events, overflow would be discharged into the existing concrete channel. Furthermore, the proposed project would feature 72,000 square feet of landscaping. Therefore, the proposed project would have a less than significant impact on groundwater supplies or groundwater recharge.

c) Substantially alter the existing drainage pattern of 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;

Less than significant impact. During construction and grading the proposed project would likely alter the on-site drainage pattern. However, the proposed project would be required to implement a SWPPP as part of the Construction General Permit. The SWPPP is designed to ensure that erosion, siltation, and flooding are prevented or minimized to the maximum extent feasible during construction. Furthermore, the proposed project would be required to adhere to Section 12.60.260 of the Rialto Municipal Code, which requires submittal and approval of a SWQMP.⁶⁹

During project operation, the proposed project would include new impervious surfaces and landscaping that would minimize soil exposure and erosion risks at the site. The proposed project would be required to submit a WQMP for review and approval by the City, as outlined in Section 12.60.260 of the Municipal Code. A PWQMP, which includes all BMPs that the proposed project will incorporate to control stormwater and non-stormwater pollutants during and after construction, has been prepared for the proposed project. In addition, the three underground infiltration basins located on the project site would further reduce impacts associated with soil erosion. Therefore, impacts related to substantial soil erosion and the loss of topsoil would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

⁶⁸ Kimley-Horn and Associates. 2022. Preliminary Water Quality Management Plan For: Santa Ana and Lilac Warehouse, Appendix E. July.

⁶⁹ City of Rialto. 2022. Rialto Municipal Code. Chapter 12.60.260 Stormwater Quality Management Plan (SWQMP). Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT12PUUT_DIV3ST_CH12.60MUSESTSESYMS_ARTVCO_RE_12.60.260STQUMAPLSW. Accessed October 26, 2022.

Less than significant impact. The proposed project would increase the amount of impervious surface area on-site compared to existing conditions, which could increase the rate or amount of surface runoff that could result in flooding. However, as mentioned above under Impact 10(c)(i), the proposed project would adhere to Section 12.60.260 of the Municipal Code which requires the approval and implementation of a WQMP.⁷⁰ Measures contained in the PWQMP prepared for the proposed project, such as landscaping and infiltration basins, would reduce the peak stormwater runoff flow rate and volumes to prevent flooding on- or off-site. Therefore, impacts would be less than significant.

- (iii) **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;**

Less than significant impact. The proposed project would increase the amount of surface runoff generated on the project site because of an increase in impervious surfaces compared to existing conditions. However, as stated in Impact 10(c)(i) and (ii), the implementation of measures detailed in the PWQMP would reduce the amount and rate of stormwater runoff the proposed project would generate. In addition, compliance with the Municipal Code would ensure that the City reviews and approves the WQMP prior to project approval. As part of this requirement, the WQMP would need to demonstrate that project stormwater flows would not be greater than existing stormwater flows. The PWQMP prepared for the proposed project indicates that the three proposed underground infiltration basins would fully infiltrate captured runoff from a 2-year storm, as well as partially store and infiltrate the 100-year storm runoff volumes. Overflow from the 100-year storm runoff would outlet via storm drainpipe to an existing concrete channel along the south of the property. As a result, the proposed project would not create or contribute runoff such that it would exceed the capacity of existing or planned stormwater drainage systems or generate substantial sources of polluted runoff. Therefore, impacts would be less than significant.

- (iv) **impede or redirect flood flows?**

Less than significant impact. The proposed project is not located in an area prone to flooding or in a designated flood hazard zone. As described under Impact 10(d) below, the project site is not susceptible to inundation from flood, tsunami, or seiche. As such, the proposed project would not impede or redirect flood flows. Therefore, impacts would be less than significant.

- d) **In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

Less than significant impact. According to Exhibit 5.2, Flooding Hazards, of the General Plan, the project site is located in an area outside of the 500-year floodplain.⁷¹ Furthermore, according to the Federal Emergency Management Agency (FEMA) flood mapper, the project site is not located within

⁷⁰ City of Rialto. 2022. Rialto Municipal Code. Chapter 12.60.260 Stormwater Quality Management Plan (SWQMP). Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT12PUUT_DIV3ST_CH12.60MUSESTSESYSMS_ARTVCO_RE_12.60.260STQUMAPLSW. Accessed October 26, 2022.

⁷¹ City of Rialto. 2010. Rialto General Plan, Exhibit 5.2—Flooding Hazards. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed October 26, 2022.

or adjacent to a flood hazard zone.⁷² Seiches and tsunamis are short duration, earthquake-generated, water waves in large, enclosed bodies of water and the open ocean. Finally, the project site is not located near any large bodies of water, and the Geotechnical Investigation prepared for the proposed project determined that the project is not subject to inundation, seiche, or tsunami.⁷³ Therefore, impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than significant impact. Given that proposed construction would disturb more than 1 acre of land, the proposed project would be required to comply with the terms of the Construction General Permit, which require the preparation and implementation of a SWPPP, as discussed above. Furthermore, the proposed project would receive potable water from the WVWD. The WVWD draws approximately 65 percent of its water supplied from its groundwater wells from five regional groundwater basins. Because of the size of the groundwater basins utilized by the WVWD; a single dry year will not affect well production. Recommended water conservation measures during times of normal supply as well as water shortage contingency measures outlined in the 2015 San Bernardino Valley Regional UWMP would further reduce water use. In adherence with Section 12.60.260 of the Municipal Code, a PWQMP that includes BMPs to ensure reduction of pollutants from runoff potentially entering surface water or groundwater basins has been prepared for the proposed project. Therefore, the proposed project would have a less than significant impact to the implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures

None required.

⁷² Federal Emergency Management Agency (FEMA). 2022. FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search?AddressQuery=lilac%20and%20santa%20ana%20rialto%20ca#searchresultsanchor>. Accessed July 7, 2022.

⁷³ Southern California Geotechnical (SoCalGeo). 2022. Geotechnical Investigation. June.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.11 Land Use and Planning <i>Would the project:</i>				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Environmental Evaluation

Setting

The project site is designated as Light Industrial according to the General Plan,⁷⁴ and zoned as M-1 according to the Zoning Map.⁷⁵

Would the project:

a) Physically divide an established community?

Less than significant impact. The four parcels on the northern portion of the site are undeveloped, while the fifth parcel on the southern portion of the site is currently developed and contains three structures as well as truck and trailer parking. The area surrounding the project site consists of land designated by the General Plan as Residential 2, General Industrial, Light Industrial, and Light Industrial with Agua Mansa Industrial Corridor Specific Plan Overlay.⁷⁶ While the project site abuts a residential area, the site itself does not contain any existing housing. In addition to the development of a new warehouse building and associated parking, the proposed project would also include approximately 1.5 acres of off-site improvements, including approximately 8,250 square feet of sidewalk, 7,300 square feet landscape improvements, and new curb and gutter along the project frontages. Paving, curb, and gutter improvements would total approximately 49,790 square feet. As such, the proposed project would not alter or remove roadways, nor would it introduce barriers that would divide an established community or reduce connectivity. Therefore, the proposed project would not physically divide an established community and any impact would be less than significant.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

⁷⁴ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed June 29, 2022

⁷⁵ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map---July-2013>. Accessed July 8, 2022.

⁷⁶ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed June 29, 2022

Less than significant impact. All five parcels are designated as Light Industrial according to the General Plan,⁷⁷ and zoned as M-1 according to the Zoning Map.⁷⁸ The Light Industrial land use designation allows for light industrial activity such as processing, packaging, machinery repair, fabrication, distribution, warehousing and storage, research and development, and similar uses which are low impact. According to the Municipal Code, the M-1 zone permits light manufacturing, processing, or treatment of products, as well as specific uses such as lumber yards, truck terminals, and hauling and storage yards, among others.⁷⁹ The proposed project consists of 294,000 square feet of warehouse space, a 3,500-square-foot mezzanine, 7,000 square feet of offices, and associated vehicle, EV, and trailer parking. The proposed project would be consistent with the site's General Plan land use and zoning designation and would not require a General Plan Amendment or rezone. Therefore, the proposed project would not conflict with any land use plan, policy, or regulation and would have a less than significant impact.

Mitigation Measures

None required.

⁷⁷ City of Rialto. 2013. Rialto Zoning Map. Website: <https://www.yourrialto.com/DocumentCenter/View/1513/Zoning-Map---July-2013>. Accessed July 8, 2022.

⁷⁸ Ibid.

⁷⁹ City of Rialto. 2010. Rialto General Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 8, 2022

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.12 Mineral Resources <i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

Environmental Evaluation

Setting

According to the General Plan, the proposed project is partially located in Sector A-27, an area designated as areas lost to land uses incompatible with mining since 1987.⁸⁰ The area is also designated as MRZ-2, areas where geologic data indicate that significant Portland Cement Concrete (PCC)-Grade aggregate resources are present.⁸¹

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

Less than significant impact. As mentioned above, the project site is located in an area designated as MRZ-2, an area where geologic data indicates that PCC-Grade aggregate resources are present. Review of Department of Conservation Mineral Land Classification Maps indicates that there are no areas within the project site or project vicinity that are located within a recognized mineral resource recovery zone.⁸² As a result, the proposed project would not be located in a resource recovery zone and would not result in the loss of a known mineral resource. Therefore, the impacts would be less than significant.

- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

Less than significant impact. the General Plan does not delineate a mineral resource recovery site on the project site. According to the General Plan, mineral resource designations are intended to

⁸⁰ City of Rialto. 2010. Rialto General Plan, Exhibit 2.6 Aggregate Resources. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 10, 2022.

⁸¹ City of Rialto. 2010. Rialto General Plan, Exhibit 2.7 Mineral Resource Zones. Website: <https://www.yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 10, 2022.

⁸² California Department of Conservation. 2015. Mineral Land Classification. Website: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed July 10, 2022.

prevent incompatible land use development in areas determined to have significant mineral resource deposits.⁸³ As described in Impact 2.11, Land Use and Planning, the proposed project would be consistent with existing land use and zoning designations. As a result, the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site.

Mitigation Measures

None required.

⁸³ City of Rialto. 2010. Rialto General Plan, Mineral Resources. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 10, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.13 Noise <i>Would the project result in:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Environmental Evaluation

Setting

This analysis is based, in part, on the Noise Impact Analysis Report prepared by FCS, dated November 4, 2022, to determine the off-site and on-site noise impacts associated with the proposed project. The report is contained in Appendix G of this document.

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5A-weighted decibel (dBA) is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the dBA was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent

Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and L_{max} is the maximum instantaneous noise level occurring over a sample period.

Would the project result in:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Short-term Construction Impacts

Less than significant impact with mitigation incorporated. For purposes of this analysis, a significant impact would occur if construction activities would generate a substantial temporary 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 City has not adopted construction-related noise thresholds of significance for CEQA consideration. The General Plan does not contain quantitative noise standards for construction activities, but Policy 5-10.3 establishes that acceptable noise levels should be maintained near noise-sensitive uses in accordance with the noise standards shown in Table 5 of the noise report contained in Appendix G. The Municipal Code does not contain quantitative noise standards for construction activities. During allowable construction hours, construction-related noises are exempt from Municipal Code provisions, provided that mitigation measures are in place. From a CEQA standpoint, the City's regulatory framework does not adequately meet the requirements of a threshold by which a determination of significance may be evaluated. As such, the following criteria to determine significance are informed by the available regulatory framework, in addition to other considerations. The proposed project's construction noise impact would be considered significant if any of the following were to occur:

- Construction activities would take place outside the allowable hours established by Rialto Municipal Code Section 9.50.070.
- Construction activities would cause ambient noise levels at noise-sensitive land uses to increase by 5dba CNEL or more to or within the City's "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility categories, as defined by Exhibit 5-5 of the Rialto General Plan.

As a 5 dBA increase represents a readily perceptible change in noise level, this threshold considers any temporary construction-related increase in ambient noise levels to or within a sensitive land uses "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility category to be significant so long as the noise level increase can be considered readily perceptible.

Construction Equipment Operational Noise

Construction of the proposed project would generate noise during the approximately 1-year schedule of demolition, site preparation, grading, building construction, paving, and architectural coatings activities. The proposed project is anticipated to utilize a standard 5-day work week, and

construction would occur during standard daytime hours, which are generally between 7:00 a.m. and 5:00 p.m. Construction would not occur during the hours prohibited by Rialto Municipal Code Section 9.50.070.

For the proposed project, the grading phase of construction is anticipated to generate the highest noise levels as heavy-duty excavators, graders, and bulldozers would be required to grade the project site. Other construction phases would require much less powerful vehicles such as a crane truck, several construction forklifts, and skid steer loaders. For these reasons, the following analysis assesses noise impacts that may result from the proposed project's grading activities.

Grading for the proposed project is estimated to last approximately 6 weeks. The bulk of grading activities would be characterized by extensive use of a grader, which would be utilized across the project site to level the site and establish proper slopes and drainages. Other vehicles, such as excavators, would also be utilized to trench for utility connections and remove soils where required, but these vehicles are not as loud as graders, and their activities would generally be located near the footprint of the proposed warehouse building, farther away from noise-sensitive residential land uses to the north and south. Given these considerations, the noise impact associated with the proposed project's grading activities has been evaluated by modeling the noise levels that would be associated with two scrapers grading a 1-acre parcel of land in proximity to surrounding sensitive residential land uses.

As shown in Table 6 of the noise report contained in Appendix G, grading for the proposed project could expose residences west of the proposed project to noise levels up to 73 dBA CNEL, in excess of the 60 dBA CNEL significance criteria. Thus, the proposed project's construction-related noise impact would be considered significant without mitigation. Implementation of MM NOI-1 would require the installation of noise barriers to shield nearby residences from the proposed project's construction noise, which would reduce construction-related noise levels at residences west of the proposed project to 58 dBA CNEL as shown in Table 7 of the noise report contained in Appendix G. This is below the existing noise levels in the vicinity of the project site, and the proposed project's mitigated construction-related noise levels of 58 dBA CNEL would not be capable of causing 5 dBA CNEL noise increases in this environment. Therefore, with the implementation of MM NOI-1, the proposed project's construction-related noise impact would be less than significant. Construction analysis worksheets related to the calculation of this impact are contained in Appendix G.

Construction-related Traffic Noise

Haul truck trips, construction worker vehicle trips, and other construction-related trips would occur over the course of the proposed project's construction. Haul truck trips typically have the greatest potential to result in substantial off-site noise increases along nearby roadways. Construction of the proposed project could require up to approximately 76 haul truck trips per day to transport fill material to the project site—less than 10 trucks per hour over the course of a standard construction workday. However, these haul truck trips are unlikely to result in substantial noise increases along surrounding roadways used to access the project site. Vehicle counts conducted as part of the proposed project's Traffic Analysis (TA) indicate that surrounding roadways carry dozens of truck

trips per hour.⁸⁴ Typically, an approximate doubling of traffic volumes is required to cause a 3 dBA noise increase. Because the proposed project's haul truck trips would represent a small fraction of daily truck traffic, they would not be capable of doubling traffic volumes along surrounding roadways and causing 3 dBA noise increases, much less 5 dBA noise increases that are the basis of the significance criteria. As such, this impact would be less than significant.

Off-site Mobile Source Operation Noise Impacts

A significant impact would occur if the proposed project's off-site mobile sources (i.e., vehicle traffic) would generate a substantial permanent increase in ambient noise levels surrounding the proposed project and any nearby roadways. The Municipal Code does not contain quantitative standards that would apply to the proposed project's off-site mobile sources and the City has not adopted mobile operational-related noise thresholds of significance for CEQA consideration. However, General Plan Policy 5-10.3 establishes that acceptable noise levels should be maintained near noise-sensitive uses in accordance with the noise standards shown in Table 5 of the noise report contained in Appendix G. For the purposes of this analysis, the following criteria to determine significance are informed by Rialto General Plan Policy 5-10.3 and the acceptable noise levels outlined in Table 5 of the noise report contained in Appendix G. The proposed project's mobile source operational noise impact would be considered significant if any of the following were to occur:

- Proposed project traffic would cause ambient noise levels at sensitive land uses to increase by 3 dBA CNEL or more to or within the City's "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility categories, as defined by Exhibit 5-5 of the Rialto General Plan (and shown in Table 5 of the noise report contained in Appendix G).

As a 3 dBA increase represents a barely perceptible change in noise level, this threshold considers any permanent increase in ambient noise levels to or within a sensitive land uses "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility category to be significant so long as the noise level increase can be considered barely perceptible. Increases less than 3 dBA CNEL would not result in noticeably louder ambient noise conditions and therefore would be considered less than significant.

Only an estimated 15 percent of the proposed project's passenger vehicle traffic would be distributed to the west of the project site past sensitive residential uses located along Santa Ana Avenue. This would amount to approximately 47 passenger vehicles per day and 21 trucks per day—only several passenger vehicle trips per hour on average.⁸⁵ No trucks would be distributed west of Santa Ana Avenue, in accordance with the moratorium on inter-city truck traffic adopted by the City in December 2022.⁸⁶ Because the proposed project's traffic distributed west along Santa Ana Avenue would represent a small fraction of this roadway's daily traffic, the proposed project's traffic would not cause the doubling of traffic volumes requisite to cause a 3 dBA CNEL noise increase along Santa Ana Avenue. As a result, sensitive residential uses along Santa Ana Avenue to the west of the

⁸⁴ Urban Crossroads. 2023. Santa Ana and Lilac Warehouse Traffic Analysis. April 19.

⁸⁵ Ibid.

⁸⁶ City of Rialto. December 13, 2022. Interim Urgency Ordinance No. 1673 (Truck Route Moratorium).

proposed project would not experience 3 dBA CNEL noise increases due to the proposed project's traffic and effects on ambient noise levels would be indiscernible from existing ambient noise conditions.

The majority of the proposed project's traffic, including approximately 85 percent of the proposed project's passenger vehicle traffic and 100 percent of the proposed project's truck traffic, would be distributed to the east and north along Santa Ana Avenue and Riverside Avenue. Uses along these roadways are limited to industrial facilities that would not be sensitive to the proposed project's traffic-related noise levels.

Therefore, the proposed project would not cause or materially contribute to substantial permanent increases in traffic noise levels, and this impact would be considered less than significant.

On-site Operational Noise Impacts

For purposes of this analysis, a significant impact would occur if the proposed project's on-site noise sources (i.e., parking lot operations, on-site truck loading, etc.) would generate a substantial permanent increase in ambient noise levels surrounding the proposed project. As discussed above, the Municipal Code does not contain quantitative standards that would apply to the proposed project's on-site operational sources and the City has not adopted operational-related noise thresholds of significance for CEQA consideration. However, General Plan Policy 5-10.3 establishes that acceptable noise levels should be maintained near noise-sensitive uses in accordance with the noise standards. Thus, the following criteria to determine significance are informed by General Plan Policy 5-10.3 and the acceptable noise levels outlined in Table 5 of the noise report contained in Appendix G. The proposed project's mobile source operational noise impact would be considered significant if any of the following were to occur:

- On-site operational sources would cause ambient noise levels at sensitive land uses to increase by 3 dBA CNEL or more to or within the City's "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility categories, as defined by Exhibit 5-5 of the Rialto General Plan (as shown in Table 5 of the noise report contained in Appendix G).

As described above, a 3 dBA increase represents a barely perceptible change in noise level, thus this threshold considers any permanent increase in ambient noise levels to or within a sensitive land use's "conditionally acceptable," "normally unacceptable," or "clearly unacceptable" land use compatibility category to be significant so long as the noise level increase can be considered barely perceptible. Increases less than 3 dBA CNEL would be considered less than significant.

The proposed project would generate noise from a variety of on-site noise sources, such as parking lot activities, new exterior mechanical equipment sources, and truck loading and unloading. Potential impacts from these noise sources are discussed below.

Parking Lot Activities

The proposed project would include 180 surface parking spaces for automobiles. The proposed project's parking facilities and the intermittent noises associated with them (e.g., doors slamming,

engines starting, etc.) would have a nominal effect on surrounding exterior noise levels. According to Federal Transit Administration (FTA) equations for the prediction of parking facility noise impacts, a facility with an hourly activity of 33 passenger vehicles (equivalent to the proposed project's peak hourly automobile trip generation) would be expected to result in a noise level of just 42 dBA L_{eq} at a reference distance of 50 feet. Given the orientation and distance of the proposed project's parking areas to residential uses west of the project site, parking lot-related noise levels at these residential uses would be below 40 dBA L_{eq} . This is well-below existing noise levels in the vicinity of the project site that range between 60 dBA CNEL and 65 dBA CNEL. As a result, parking lot-related noise levels would not be capable of causing or materially contributing to noise increases of 3 dBA CNEL at sensitive residential uses west of the project site.

Mechanical Equipment Operations

At the time of preparation of this analysis, details were not available pertaining to the proposed rooftop mechanical ventilation systems for the project; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from commercially available rooftop mechanical ventilation equipment range from 50 dBA to 60 dBA L_{eq} at a distance of 25 feet.

Because the proposed project's rooftop mechanical ventilation equipment would be located no less than 50 feet from sensitive residential uses to the west (as well as behind parapets or screened), noise levels from this equipment would reasonably be less than 45 dBA L_{eq} at these uses. Assuming continuous operations, this corresponds with a 24-hour noise level no greater than 52 dBA CNEL. This is below existing noise levels in the vicinity of the project site that range between 60 dBA CNEL and 65 dBA CNEL. As a result, noise levels from the proposed project's rooftop mechanical ventilation equipment would have a minimal effect on noise levels at sensitive residential uses to the west, below 1 dBA CNEL.

Truck Loading Activities

Noise would be also generated by truck loading and unloading activities at the loading docks along the west side of the proposed project. Typical maximum noise levels from truck loading and unloading activity are 70 dBA L_{max} as measured at 50 feet. These maximum noise levels include noise from associated truck loading/unloading activity, including trucks maneuvering, truck trailer loading, truck trailer unloading, backup alarms or beepers, and truck docking noise.

Sensitive residential uses to the west of the proposed project would be located over 415 feet from the proposed project's loading dock areas. The massing of the proposed project would also shield these areas from sensitive residential uses—meaning that they would have no line of sight to the proposed project's truck loading activities. Conservatively assuming that “worst-case” noise levels of 70 dBA L_{max} at 50 feet may be generated for 50 percent of an hour, this translates to an hourly noise level of 38.6 dBA L_{eq} at the nearby residential uses. As the proposed project would operate 24 hours per day, this would correspond with a 24-hour noise level of 46 dBA CNEL at these residential uses. This is well-below existing noise levels in the vicinity of the project site that range between 60 dBA CNEL and 65 dBA CNEL. As a result, noise levels from the proposed project's truck loading activities would not be capable of causing or materially contributing to noise increases of 3 dBA CNEL at sensitive residential uses west of the project site.

Combined Stationary Sources

As discussed, noise levels from the proposed project's parking lot, mechanical equipment, and truck loading activities would have a minimal impact at sensitive residential uses that are west of the project site. Given that existing noise levels in the vicinity range between 60 dBA CNEL and 65 dBA CNEL, the combined effect of these on-site operational noise sources at the residential uses would be less than a 1 dBA CNEL increase, which is below the minimum 3 dBA CNEL noise increase threshold. Therefore, the impact of noise generated by the proposed project's stationary noise sources would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. There are no federal, State, or City standards that would regulate the proposed project's vibration impacts from temporary construction activities or operations, nor are there quantitative thresholds. Therefore, the proposed project's vibration impacts would be considered significant if the proposed project would generate groundborne vibration levels in excess of the criteria identified by the FTA criteria in its 2018 Transit Noise and Vibration Impact assessment manual, as summarized in Table 8 of the noise report contained in Appendix G.

Short-term Construction Vibration Impacts

Construction of the proposed project would require a variety of large, steel-tracked earthmoving vehicles. According to the FTA, large bulldozers and similar heavy equipment can generate groundborne vibration levels up to 0.089 in/sec peak particle velocity (PPV) at a reference distance of 25 feet. In other words, these vehicles could expose buildings within 25 feet of their construction activities to groundborne vibration levels up to 0.089 in/sec PPV. The nearest buildings to the project site are accessory buildings associated with residential uses, located up to approximately 15 feet west of the project site. At this distance, groundborne vibration levels from large bulldozers and similar heavy grading vehicles operating near the proposed project's western property line would be approximately 0.16 in/sec PPV. The construction and condition of these nearby accessory buildings indicate that their appropriate FTA damage threshold is 0.2 in/sec PPV, at a minimum. As the proposed project's maximum construction-related groundborne vibration levels at these buildings would be less than 0.2 in/sec PPV, the proposed project would not expose these accessory buildings to potentially damaging levels of groundborne vibration.

Other buildings are located at much greater distances from the project site and would experience reduced groundborne vibration levels from the proposed project's construction activities. For example, industrial buildings across Lilac Avenue are located over 80 feet east of the project site. Industrial buildings across Santa Ana Avenue are located approximately 140 feet north of the project site. At these distances, groundborne vibration levels from the proposed project's construction activities would be below the FTA's most stringent thresholds for building damage and even further below the appropriate thresholds for modern industrial buildings. Given these considerations, the proposed project's building damage related groundborne vibration impact from construction activities would be less than significant.

Operational Vibration Impacts

Implementation of the proposed project would not include sources of vibration that could expose persons at nearby residential land uses to perceptible groundborne vibration levels. Vehicles rarely cause perceptible vibrations unless they drive over bumps, cracks, potholes, or other surface irregularities. Vehicles, including trucks, driving on the project site would also travel at low speeds, which would further reduce their potential to generate perceptible groundborne vibrations. Additionally, the location of the proposed project's loading docks where trucks would operate would be over 400 feet from the nearest sensitive residential uses.

Regarding building damage, it is unrealistic to assume that any on-site sources of groundborne vibration would be potentially damaging at nearby buildings, because, as discussed earlier, not even heavy-duty construction vehicles would be capable of generating such impacts.

Given these considerations, the proposed project's groundborne vibration impact from operations would be less than significant.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No impact. A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The project site is not located in the vicinity of a private airstrip. The nearest public airport, San Bernardino International Airport, is located over 7 miles east of the project site. As such, the project site is located outside the influence area of this airport. Implementation of the proposed project would not expose persons residing or working in the vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for land use development, and no impact would occur. Moreover, the proposed project is not a noise-sensitive land use. Development at the project site would not present a land use and noise compatibility issue.

Mitigation Measures

- MM NOI-1** For the duration of the proposed project's on-site construction activities, noise barriers shall be installed along the western property line of the project site that abuts residential properties to the west. The height of the noise barriers shall be sufficient to shield single-family homes associated with these residential properties. The material of the noise barriers shall be rated to achieve a transmission loss value no less than 15 A-weighted decibels (dBA).

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.14 Population and Housing <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Setting

According to the California Department of Finance, the population of Rialto was 103,954 persons as of January 1, 2022, with 3.77 persons per household.⁸⁷ The City had 1,800 unemployed persons as of June 2022.⁸⁸

Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less than significant impact. Unplanned direct population growth would occur if the proposed project produced a population growth not anticipated and evaluated by the City in its General Plan. The proposed project consists of the construction of a warehouse facility and does not propose the construction of any housing. The proposed project would employ approximately 252 employees on-site. According to the California Employment Development Department, there were 1,800 unemployed persons in the City as of June 2022.⁸⁹ It is expected that project employees would be generated from the existing available workforce within the City. Therefore, impacts related to substantial unplanned population growth would be less than significant.

⁸⁷ California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State. Website: <https://dof.ca.gov/forecasting/Demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>. Accessed June 27, 2022.

⁸⁸ Employment Development Department (EDD). Labor Force and Unemployment Rate for Cities and Census Designated Places. San Bernardino County. Website: <https://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html>. Accessed June 22, 2022.

⁸⁹ Ibid.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The proposed project consists of the construction of a warehouse facility and associated office space. As mentioned previously, the northern portion of the project site is vacant, while the southern portion contains an existing truck and trailer operation. There is no existing housing on the project site. Therefore, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. As such, no impacts would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.15 Public Services <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Environmental Evaluation

Setting

The Rialto Fire Department provides fire protection services to the City. The Rialto Fire Department is an all-risk fire agency providing fire suppression, emergency medical, hazardous materials, technical rescue, and other related emergency services.⁹⁰ The Rialto Fire Department operates four fire stations, one administrative office, three engine companies, one truck company, and four paramedic ambulances each day. On-duty personnel provide staffing for the Hazardous Materials unit and Urban Search and Rescue unit.⁹¹ The Rialto Fire Department primarily responds to calls related to fire and rescue (9 percent of total volume), traffic collisions (8 percent of total volume), and medical (83 percent of total volume).⁹² The closest fire station to the project site is Rialto Fire Department Station 205, located at 1485 S Willow Avenue approximately 1.31 miles northeast of the site.⁹³

The Rialto Police Department provides police protection services to the City and maintains 176 total employees within a service area of 28.5 miles, serving a population of over 100,000 people.⁹⁴ The Rialto Police Department provides a full range of law enforcement and community safety programs, including field patrol, K-9, School Resource Officer, Drug Abuse Resistance Education, Street Crime Attack Team, investigations, traffic, narcotics, training/backgrounds, Strategic Weapons and Tactics, and crisis negotiations.⁹⁵ Rialto Police Departments operates three divisions, including an Operations

⁹⁰ City of Rialto. 2010. Rialto General Plan, Fire Department. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

⁹¹ City of Rialto. 2022. Fire Department. Website: <https://yourrialto.com/233/Fire-Department>. Accessed July 11, 2022.

⁹² City of Rialto. 2015. Fire Department Strategic Plan for Fiscal Years 2016-2020.

⁹³ City of Rialto. 2022. Facilities. Website: <https://www.yourrialto.com/Facilities?clear=False>. Accessed July 11, 2022.

⁹⁴ City of Rialto. 2022. Rialto Police Department. Our Department. Website: <https://rialtopolice.com/our-department>. Accessed July 11, 2022.

⁹⁵ City of Rialto. 2010. Rialto General Plan, Police Department. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

Division, Support Division, and Professional Standards Division.⁹⁶ The closest Police Department is approximately 3.03 miles to the north at 128 N Willow Avenue.

The City is served by three school districts: Rialto Unified School District, Colton Joint Unified School District (CJUSD), and Fontana Unified School District.⁹⁷ The project site is located within the service boundaries of the CJUSD,⁹⁸ which as of 2021 had a student population of 20,550 students.⁹⁹ The CJUSD operates a total of 29 schools, including 18 elementary schools, four middle schools, five high schools, one adult school, and one preschool.¹⁰⁰ Crestmore Elementary School is closest to the project site, located approximately 0.66 miles to the south.¹⁰¹

The City currently maintains approximately 127 acres of active use parkland as well as 171.9 acres of open space. In total, the City contains 10 parks, which include mini parks, neighborhood parks, and community parks.¹⁰² The City has adopted a standard of 3 acres of parkland per 1,000 residents and uses this ratio for park dedication/fees requirements.¹⁰³ The nearest City park is Rialto City Park, located approximately 1.61 miles north of the project site.¹⁰⁴ Kessler Park, which is operated by the Bloomington Recreation and Park District established by the County of San Bernardino Board of Supervisors, is located 1.18 miles southwest of the project site.¹⁰⁵

FCS mailed letters to Rialto Fire Department and Rialto Police Department requesting information related to staffing, service ratios, and any other information helpful to the analysis of the project. These letters can be found in Appendix H. No responses have been received to date.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than significant impact. Fire protection services in the City is provided by Rialto Fire Department. As mentioned previously, the proposed project would employ approximately 252

⁹⁶ City of Rialto. 2022. Rialto Police Department. Website: <https://rialtopolice.com>. Accessed July 11, 2022.

⁹⁷ City of Rialto. 2010. Rialto General Plan, Education and Library. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

⁹⁸ City of Rialto. 2010. Rialto General Plan, Exhibit 3.4 School Districts and Facilities. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

⁹⁹ California School Dashboard. 2017. Colton Joint Unified. <https://www.caschooldashboard.org/reports/36676860000000/2021>. Accessed July 11, 2022.

¹⁰⁰ Colton Joint Unified School District (CJUSD). 2022. CUSD Schools Directory. Website: <https://www.cjUSD.net/domain/40>. Accessed July 11, 2022.

¹⁰¹ Colton Joint Unified School District (CJUSD). 2022. District Schools Map. Website: <https://www.cjUSD.net/domain/40>. Accessed July 14, 2022.

¹⁰² City of Rialto. 2010. Rialto General Plan, Open Space and Recreation. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

¹⁰³ Ibid.

¹⁰⁴ City of Rialto. 2022. Facilities Map. Website: <https://yourrialto.com/Facilities?clear=True>. Accessed July 14, 2022.

¹⁰⁵ San Bernardino County Special Districts. 2022. Kessler Park. Website: <https://specialdistricts.sbcounty.gov/home/parks-and-recreation/bloomington-rec-park/bloomington-parks/kessler-park/>. Accessed July 14, 2022.

employees on-site, which would increase demand for fire protection services compared to existing conditions.

Access to the site would be provided via one 40-foot-wide driveway and one 26-foot-wide driveway along Santa Ana Avenue, and one 40-foot-wide driveway along Lilac Avenue which would provide sufficient width and turning radii consistent with the California Fire Code. The proposed project would also include drive aisles that are approximately 26-feet wide along the north, west, and south edge of the project site as well as approximately 40-foot wide drive aisles along the eastern edge of the project site which would facilitate site access in the event fire protection services are required. In addition, the proposed project would be required to pay impact fees consistent with Municipal Code Chapter 3.33.220 Fire Protection Facilities Development Fee to provide for any project-related incremental impacts to fire protection service.¹⁰⁶ Therefore, the proposed project would not result in a need for new or expanded fire protection facilities, and impacts would be less than significant.

b) Police protection?

Less than significant impact. Police protection services in the City are provided by the Rialto Police Department. As mentioned previously, the proposed project would employ approximately 252 employees on-site, which would increase demand for police services compared to existing conditions. However, the proposed project would be required to pay development impact fees consistent with Municipal Code Chapter 3.33.210 Law Enforcement Facilities Development Impact Fee (DIF), which would ensure the Rialto Police Department would have sufficient ability to serve the project site.¹⁰⁷ Therefore, the proposed project would not result in a need for new or expanded police facilities, and impacts would be less than significant.

c) Schools?

Less than significant impact. Consistent with the City's employment projections, the proposed project would employ approximately 252 employees that are anticipated to come from the local labor market and would not result in an increased demand for school services compared to existing conditions. The proposed project would be required to pay a maximum development fee of \$0.78 per square-foot for new commercial/industrial development as set forth by the CJUSD.¹⁰⁸ Pursuant to Government Code Sections 65995 and 65996(b), payment of adopted development fees is considered "full and complete mitigation" for impacts to school facilities, and local governments are prohibited from assessing additional fees or exactions for school impacts. With the payment of these fees, the proposed project would not result in a significant increase in demand for school facilities that would require the construction of new facilities or expansion of existing facilities. As such, impacts would be less than significant.

¹⁰⁶ City of Rialto. 2020. Rialto Municipal Code. Website:
https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT3REFI_CH3.33DEIMFE_3.33.220FIPRFADEFE.
Accessed July 11, 2022.

¹⁰⁷ Ibid.

¹⁰⁸ Colton Joint Unified School District (CJUSD). 2022. Fee Justification Report For Residential & Commercial/Industrial Development.

d) Parks?

Less than significant impact. The proposed project would employ 252 employees which would likely be generated from the existing labor force within the City and would not result in an increase in population as no housing is being constructed. As a result, the proposed project is not expected to increase demand for parks compared to existing conditions. The proposed project would be required to pay DIF consistent with Municipal Code Section 3.33. Parks and Recreation DIF.¹⁰⁹ Payment of these fees would ensure that the City is able to meet its standard of 3 acres per 1,000 residents. With payment of these fees, the proposed project would not create an increase in demand for park facilities that would require the construction of new facilities or expansion of existing facilities. There would be no significant impact to parks.

e) Other public facilities?

Less than significant impact. Other public facilities within the City include libraries. Library services within the City are provided by the San Bernardino County Library System. The City of Rialto contains two branches: The Rialto Branch Library and Carter Branch Library, both of which offer a full range of resources including books, movies, and computers with internet access.¹¹⁰ The Rialto Branch Library is closest to the proposed project and is located approximately 3.06 miles north of the project site. Because of the nature of the proposed project, the proposed project would not create an increase in demand for libraries or other public facilities that would require the construction of new facilities or expansion of existing facilities. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

¹⁰⁹ City of Rialto. 2020. Rialto Municipal Code. Website:
https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT3REFI_CH3.33DEIMFE_3.33.220FIPRFADEFE.
Accessed July 11, 2022.

¹¹⁰ City of Rialto. 2010. Rialto General Plan, Economic Development, Redevelopment, and Infrastructure. Website:
<https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 11, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.16 Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Evaluation

Setting

The City operates one pocket park, six neighborhood parks, three community parks, and six other recreational facilities, including the Rialto Community Center, Rialto Racquet and Fitness Center, Timy Sawyer Swimming Pool, Rialto Community Playhouse, Rialto Activities Center, and Rialto Senior Center.¹¹¹

- 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?**

Less than significant impact. The proposed project consists of the construction of a warehouse with associated offices and parking. The proposed project would not result in an increase in population as no housing is being constructed and future employees would likely be generated from the existing labor force within the City. Therefore, it is unlikely the proposed project would result in an increase in the use of existing neighborhood or regional parks. As such, the impacts would be less than significant.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Less than significant impacts. The proposed project consists of the construction of a warehouse with associated offices and parking. The proposed project does not include the construction of any recreational facilities or parks which might have an adverse physical impact on the environment. As discussed above in Impact 2.15 Public Services, the City of Rialto has a service standard of 3 acres of parks per 1,000 residents. However, the proposed project would not result in an increase in

¹¹¹ City of Rialto. 2010. Rialto General Plan, Open Space and Recreation. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 10, 2022.

population and thus would not require the construction or expansion of recreational facilities. As such, the impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.17 Transportation <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Environmental Evaluation

The analysis in this section is based, in part, on the TA prepared on April 19, 2023 and VMT Analysis prepared on July 25, 2022 by Urban Crossroads, Inc. (Urban Crossroads). The TA and VMT Analysis can be found in Appendix I.

Setting

Traffic Impact Study

Urban Crossroads prepared a TA to evaluate the potential circulation system impacts as a result of the implementation of the proposed project and to provide, where applicable, recommended improvements to achieve a Level of Service (LOS) consistent with the General Plan LOS goals and policies. The TA was prepared in accordance with City Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, the San Bernardino County Congestion Management Program (CMP) Guidelines for CMP Traffic Impact Analysis Reports, and consultation with the City.

The TA assessed potential deficiencies to traffic and circulation for Existing (2022) Conditions, Existing Plus Ambient Growth Plus Project (EAP) (2024) Conditions, and Existing Plus Ambient Growth Plus Project Plus Cumulative (EAPC) (2024) Conditions.

Study Area

The following nine study area intersections were selected based on consultation with City staff.

1. Driveway 1 and Santa Ana Avenue
2. Driveway 2 and Santa Ana Avenue
3. Lilac Avenue and Santa Ana Avenue

4. Lilac Avenue and Driveway 3
5. Willow Avenue and Santa Ana Avenue
6. Riverside Avenue and I-10 Westbound Ramps
7. Riverside Avenue and I-10 Eastbound Ramps
8. Riverside Avenue and Slover Avenue
9. Riverside Avenue and Santa Ana Avenue

Minimum Acceptable Level of Service

LOS is a qualitative description of traffic flow based on several factors, such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. Minimum acceptable LOS and associated definitions of intersection deficiencies has been obtained from each of the applicable surrounding jurisdictions.

Automobile delay, as described solely by LOS or similar measure of traffic congestion, is no longer considered a significant impact under CEQA, except in locations specifically identified in the Guidelines (Public Resources Code [PRC] § 21099(b)(2)). This provision took effect in 2018 when the update to the CEQA Guidelines was certified (CEQA Guidelines § 15064.3).

City of Rialto

The 2010 General Plan Update has established minimum LOS standards. Specifically, General Plan Policies 4-1.20 and 4-1.21 establish the minimum standards to be applied to any Traffic Impact Analysis, as follows:

- Policy 4-1.20** Design City streets so that signalized intersections operate at Level of Service (LOS) D or better during the morning and evening peak-hours and require new development to mitigate traffic impacts that degrade LOS below that level.
- Policy 4-1.21** Design City streets so that unsignalized intersections operate with no vehicular movement having an average delay greater than 120 seconds during the morning and evening peak-hours and require new development to mitigate traffic impacts that increase delay above that level.

The City's Traffic Study Guidelines identifies LOS D as the minimum LOS for intersections and roadway segments, with the exception of Riverside Drive south of the Metrolink tracks to the City's southern border, which can operate at LOS E.

Additionally, the Rialto Municipal Code include performance standards that projects containing indoor storage uses are required to comply with.¹¹²

¹¹² City of Rialto Municipal Code. Chapter 18.112.060 - Performance Standards. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT18ZO_CH18.112INSTUS_18.112.060PEST. Accessed May 2, 2023.

County of San Bernardino

According to the County of San Bernardino’s TA Guidelines, the following LOS will be utilized for study area intersections located within the County: Require development to achieve a peak-hour LOS D or better. Therefore, any intersection operating at LOS E or F is considered deficient for the purposes of the TA.

San Bernardino County Congestion Management Plan

The CMP definition of deficiency is based on maintaining a LOS standard of LOS E or better, where feasible, except where an existing LOS F condition is identified in the CMP document. However, for the purposes of this analysis, LOS D has been utilized for all study area intersections.

Existing (2022) Traffic Counts

The intersection LOS analysis is based on the traffic volumes observed during the peak-hour conditions using traffic count data collected in February 2022. The following peak-hours were selected for analysis:

- Weekday AM peak-hour (peak-hour between 7:00 a.m. and 9:00 a.m.)
- Weekday PM peak-hour (peak-hour between 4:00 p.m. and 6:00 p.m.)

The traffic counts include the following vehicle classifications: Passenger Cars, 2-Axle Trucks, 3-Axle Trucks, and 4- or More Axle Trucks. To represent the effects large trucks, buses, and recreational vehicles have on traffic flow; all trucks were converted into Passenger Car Equivalent (PCE). By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slow-down is much longer than for passenger cars and varies depending on the type of vehicle and number of axles. For the purpose of this analysis, a PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks to estimate each turning movement. These factors are consistent with the values recommended for use in the CMP and the City’s Traffic Study Guidelines. The raw manual peak-hour turning movement traffic count data sheets are included in Appendix I.

Intersection Operation Analysis

Existing peak-hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 Intersection Capacity Analysis of the TA. The intersection operations analysis results are summarized on Table 17 below, which indicates that all existing study area intersections are currently operating at acceptable LOS during the peak-hours. The intersection operations analysis worksheets are included in Appendix I.

Table 17: Intersection Analysis for Existing (2022) Conditions

No.	Intersection	Traffic Control	Delay*(seconds)		Level of Service	
			AM	PM	AM	PM
1	Driveway 1 and Santa Ana Avenue	CSS	9.9	9.3	A	A
2	Driveway 2 and Santa Ana Avenue	CSS	10.0	9.9	B	A

No.	Intersection	Traffic Control	Delay*(seconds)		Level of Service	
			AM	PM	AM	PM
3	Lilac Avenue and Santa Ana Avenue	CSS	11.4	11.8	B	A
4	Lilac Avenue and Driveway 3	—	Future Intersection			
5	Willow Avenue and Santa Ana Avenue	AWS	8.5	8.7	A	A
6	Riverside Ave. and I-10 WB Ramps	TS	17.2	14.3	B	B
7	Riverside Avenue and I-10 EB Ramps	TS	18.9	23.6	B	C
8	Riverside Avenue and Slover Avenue	TS	30.0	29.6	C	C
9	Riverside Avenue and Santa Ana Avenue	TS	13.6	14.3	B	B

Notes:

WB = West Bound; EB = East Bound; CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal

* Per the Highway Capacity Manual (6th Edition), overall average intersection delay and LOS are shown for intersection with a traffic signal, or all way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.

Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.

Traffic Signal Warrant Analysis

Traffic signal warrants for Existing traffic conditions are based on existing peak-hour intersection turning volumes. There are no unsignalized study area intersections that currently warrant a traffic signal for Existing traffic conditions. Existing conditions traffic signal warrant analysis worksheets are provided in Appendix I

Freeway Off-Ramp Queueing Analysis

A queueing analysis was performed for the off-ramps at the study area intersections along I-10 to assess vehicle queues for the off-ramps that may potentially result in deficient peak-hour operations at the ramp-to-arterial intersections and may potentially “spill back” onto I-10 mainlines. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown on Table 18 below, there are no movements that are currently experiencing queueing issues during the weekday AM or weekday PM peak 95th percentile traffic flows. Worksheets for Existing traffic conditions off-ramp queueing analysis are provided in Appendix I.

Table 18: Freeway Off-ramp Queueing Summary for Existing (2022) Conditions

Intersection	Movement	Available Stacking Distance	95th Percentile Queue (Feet)		Acceptable? ¹	
			AM Peak-hour	PM Peak-hour	AM	PM
Riverside Avenue and I-10 WB Ramps	WBL	450	260	250	Yes	Yes
	WBL/T/R	1,200	207	195	Yes	Yes
	WBR	330	113	181	Yes	Yes

Intersection	Movement	Available Stacking Distance	95th Percentile Queue (Feet)		Acceptable? ¹	
			AM Peak-hour	PM Peak-hour	AM	PM
Riverside Avenue and I-10 EB Ramps	EBL	1,350	254	356 ²	Yes	Yes
	EBL/T/R	1,350	214	273 ²	Yes	Yes
	EBR	325	178	218	Yes	Yes
Notes: WBL = West Bound Left WBL/T/R = westbound left/through/right turn lane WBR = West Bound Right EBL = East Bound Left EBL/T/R = eastbound left/through/right turn lane EBR = East Bound Right ¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the staking distance provided. An additional 25 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable. ² 95th percentile volume exceeds capacity; queue may be longer. Queue shown is maximum after two cycles. Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.						

Projected Future Traffic

Project Trip Generation

Trip generation represents the amount of traffic which is both attracted to and produced by a development. Determining traffic generation for a specific project is therefore based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed for a given development. In order to develop the traffic characteristics of the approved Project, trip-generation statistics published in the Institute of Transportation Engineering (ITE) Trip Generation Manual (11th Edition, 2021) were used to estimate the trip generation rates as shown in Table 19 below.

Table 19: Project Trip Generation Rates

Land Use	ITE LU Code	Units ¹	Delay* (seconds)			Level of Service			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicle Trip Generation Rates:									
Warehousing ²	150	TSF	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars (60.0%)			0.095	0.007	0.102	0.013	0.095	0.108	1.026
2-Axle Trucks (0.8%)			0.001	0.000	0.001	0.001	0.000	0.001	0.014
3-Axle Trucks (11.2%)			0.010	0.009	0.019	0.010	0.010	0.020	0.192
4+-Axle Trucks (28.0%)			0.025	0.023	0.048	0.026	0.024	0.050	0.479
Passenger Car Equivalent (PCE) Trip Generation Rates ³									
Warehousing ²	150	TSF	0.131	0.039	0.170	0.050	0.130	0.180	1.710

Land Use	ITE LU Code	Units ¹	Delay* (seconds)			Level of Service			Daily
			In	Out	Total	In	Out	Total	
Passenger Cars			0.095	0.007	0.102	0.013	0.095	0.108	1.206
2-Axle Trucks (PCE=1.5)			0.002	0.001	0.002	0.002	0.001	0.002	0.021
3-Axle Trucks (PCE=2.0)			0.020	0.018	0.038	0.020	0.020	0.040	0.383
4+-Axle Trucks (PCE=2.0)			0.075	0.068	0.143	0.078	0.073	0.151	1.436

Notes:
¹ TSF = thousand square feet
² Vehicle and Truck Mix Source: City of Rialto Public Works Department. 2013. Traffic Impact Analysis Report Guidelines and Requirements.
³ PCE rates are per City of Rialto Public Works Department. 2013. Traffic Impact Analysis Report Guidelines and Requirements.
Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.
Trip Generation Source: Institute of Transportation Engineering (ITE). 2021. Trip Generation Manual, 11th Edition.

As shown in Table 20 below, the proposed project is anticipated to generate 520 two-way trips per day with 52 trips generated during the AM peak-hour and 55 trips generated during the PM peak-hour (in actual vehicles). In comparison, the proposed project is anticipated to generate 874 PCE trips per day with 86 PCE AM peak-hour trips and 91 PCE PM peak-hour trips.

Table 20: Project Trip Generation Summary

Project	Quantity	Units ¹	AM Peak-hour			PM Peak-hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles:									
Santa Ana and Lilac Warehouse	301.000	TSF	–	–	–	–	–	–	–
Passenger Cars:	–	–	29	2	31	4	28	33	310
2-Axle Trucks:	–	–	0	0	0	0	0	0	6
3-Axle Trucks:	–	–	3	3	6	3	3	7	58
4+-Axle Trucks:	–	–	8	7	15	8	7	15	146
Total Trucks:	–	–	11	10	21	11	11	22	210
Total trips (Actual Vehicles) ²	–	–	39	12	52	15	39	55	520
Passenger Car Equivalent:									
Santa Ana and Lilac Warehouse	301.00	TSF	–	–	–	–	–	–	–
Passenger Cars:	–	–	29	2	31	4	28	33	310
2-Axle Trucks (PCE = 1.5)	–	–	0	0	1	0	0	1	10
3-Axle Trucks (PCE = 2.0)	–	–	6	5	11	6	6	12	116
4+-Axle Trucks (PCE = 2.0)	–	–	23	20	43	23	22	46	438
Total Trucks (PCE):	–	–	29	26	55	30	28	58	564

Project	Quantity	Units ¹	AM Peak-hour			PM Peak-hour			Daily
			In	Out	Total	In	Out	Total	
Total Trips (PCE) ²	—	—	58	28	86	34	57	91	874
Notes: ¹ TSF = Thousand Square Feet ² Total trips = Passenger Cars + Truck Trips Source: Urban Crossroads. Santa Ana and Lilac Warehouse. Traffic Analysis. April 19, 2023.									

Project Trip Distribution

The project trip distribution and assignment process represents the directional orientation of traffic to and from the project site. The trip distribution pattern is heavily influenced by the geographical location of the site, the location of surrounding uses, and the proximity to the regional freeway system. In order to comply with the City's truck moratorium, the project trip distribution utilizes Santa Ana Avenue to the east to Riverside Avenue and then north to I-10. Exhibit 4-1 and Exhibit 4-2 of the TA illustrate the truck and passenger car trip distribution patterns for the proposed project, respectively (Appendix I).

Modal Split

The potential for project trips (non-truck) to be reduced by the use of public transit, walking or bicycling have not been included as part of the project's estimated trip generation. Essentially, the project's traffic projections are "conservative" in that these alternative travel modes would reduce the forecasted traffic volumes.

Project Trip Assignment

The assignment of traffic from the project area to the adjoining roadway system is based upon the project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the proposed project. Based on the identified project traffic generation and trip distribution patterns, project weekday Average Daily Traffic (ADT) and weekday peak-hour intersection turning movement volumes are shown on Exhibit 4-3 of the TA (Appendix I).

Background Traffic

Future year traffic forecasts have been based upon background (ambient) growth at 2 percent per year for 2024 traffic conditions. The total ambient growth is 4.04 percent for 2024 traffic conditions. The ambient growth factor is intended to approximate regional traffic growth. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth has been added to daily and peak-hour traffic volumes on surrounding roadways, in conjunction with traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. Opening Year Cumulative (2024) traffic volumes are provided in Section 4.6 of the TA (Appendix I). The traffic generated by the proposed project was then manually added to the base volume to determine EAP/EAPC forecasts.

The near-term TA includes the following traffic conditions, with the various traffic components:

- EAP (2024)
 - Existing (2022) volumes
 - Ambient growth traffic (4.04 percent over 2 years)
 - Project Traffic
- EAPC (2024)
 - Existing (2022) volumes
 - Ambient growth traffic (4.04 percent over 2 years)
 - Project Traffic
 - Cumulative Development traffic

Cumulative Development Traffic

A cumulative project list was developed for the purposes of this analysis through consultation with planning and engineering staff from the City. The cumulative projects listed are those that would generate traffic and would contribute traffic to study area intersections. Cumulative projects from the neighboring jurisdictions of Fontana and the County of San Bernardino have also been included.

Exhibit 4-4 of the TA illustrates the cumulative development location map. A summary of cumulative development projects and their proposed land uses are shown on Table 4-3 of the TA. If applicable, the traffic generated by individual cumulative projects was manually added to the Opening Year Cumulative forecasts to ensure that traffic generated by the listed cumulative development projects on Table 4-3 of the TA are reflected as part of the background traffic. In an effort to conduct a conservative analysis, the cumulative projects are added in conjunction with the ambient growth identified in Section 4.5 Background Traffic. Cumulative ADT and peak-hour intersection turning movement volumes are shown on Exhibit 4-5 of the TA (Appendix I).

Near-Term Conditions

The “buildup” approach has been utilized which combines existing traffic counts with a background ambient growth factor to forecast the EAP (2024) and EAPC (2024) traffic conditions. An ambient growth factor of 4.04 percent accounts for background (area-wide) traffic increases that occur over time up to the year 2024 from the year 2022 (2.0 percent per year, compounded over a 2-year period). Project traffic is added to assess EAP (2024) and EAPC (2024) traffic conditions, respectively. Traffic volumes generated by cumulative development projects are included to assess the EAPC (2024) traffic conditions. The 2024 roadway networks are similar to the existing conditions roadway network with the exception of future roadways and intersections proposed to be developed by the proposed project.

EAP (2024) Conditions

Roadway Improvements

The lane configurations and traffic controls assumed to be in place for EAP (2024) conditions are consistent with those shown on Exhibit 3-1 of the TA (Appendix I), with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the proposed project to provide site access are also assumed to be in place for EAP (2024) conditions only (e.g., intersection and roadway improvements at the proposed project's frontage and driveways).

EAP (2024) Traffic Volume Forecasts

This scenario includes Existing traffic volumes plus an ambient growth factor of 4.04 percent and the addition of project traffic. The weekday ADT and weekday peak-hour intersection turning movement volumes which can be expected for EAP (2024) traffic conditions are shown on Exhibit 5-1 of the TA (Appendix I).

Intersection Operation Analysis

EAP (2024) peak-hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 Methodologies of the TA. The intersection analysis results are summarized on Table 21 below for EAP (2024) traffic conditions, which indicate that all of the study area intersections are anticipated to continue to operate at an acceptable LOS under EAP (2024) traffic conditions, in addition to the intersections previously identified for Existing traffic conditions. The intersection operations analysis worksheets for EAP (2024) traffic conditions are included in Appendix I.

Table 21: Intersection Analysis for EAP (2024) Conditions

No.	Intersection	Traffic Control	Existing (2022)				EAP (2024)			
			Delay*(secs.)		LOS		Delay* (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM
1	Driveway 1 and Santa Ana Avenue	CSS	9.9	9.3	A	A	10.4	9.7	B	A
2	Driveway 2 and Santa Ana Avenue	CSS	10.0	9.9	B	A	11.1	10.9	B	B
3	Lilac Avenue and Santa Ana Avenue	CSS	11.4	11.8	B	A	12.3	12.7	B	B
4	Lilac Avenue and Driveway 3	CSS	Future Intersection				9.5	9.1	A	A
5	Willow Avenue and Santa Ana Avenue	AWS	8.5	8.7	A	A	9.1	9.3	A	A
6	Riverside Avenue and I-10 WB Ramps	TS	17.2	14.3	B	B	18.8	15.2	B	B
7	Riverside Avenue and I-10 EB Ramps	TS	18.9	23.6	B	C	21.1	26.4	C	C
8	Riverside Avenue and Slover Avenue	TS	30.0	29.6	C	C	36.6	35.1	D	D
9	Riverside Avenue and Santa Ana Avenue	TS	13.6	14.3	B	B	14.2	15.0	B	B
Notes: CSS = Cross-street Stop; AWS = All-Way Stop; CSS = Improvement * Per the Highway Capacity Manual (6 th Edition), overall average intersection delay and LOS are shown for intersection with a traffic signal, or all way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.										

No.	Intersection	Traffic Control	Existing (2022)				EAP (2024)			
			Delay*(secs.)		LOS		Delay* (secs.)		LOS	
			AM	PM	AM	PM	AM	PM	AM	PM
Deficient occurs (improvements needed) when the addition of project-related trips causes either peak-hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E/F) or the peak-hour delay to increase as follows: - LOS A/B = By 10.0 seconds - LOS C = By 8.0 seconds - LOS D = By 5.0 seconds - LOS E = By 2.0 seconds - LOS F = By 1.0 seconds Source: Urban Crossroads. Santa Ana and Lilac Warehouse. Traffic Analysis. April 19, 2023.										

Traffic Signal Warrant Analysis

The traffic signal warrant analysis for EAP (2024) traffic conditions are based on the peak-hour volumes or planning level ADT volume-based traffic signal warrants. No study area intersections are anticipated to meet either peak-hour volume or ADT volume-based warrants with the addition of project traffic (see Appendix 5.2 of the TA).

Off-Ramp Queueing Analysis

Queueing analysis findings for EAP (2024) are presented on Table 22 below. As shown on Table 22, there are no movements that are anticipated to experience queueing issues during the weekday AM or weekday PM peak 95th percentile traffic flows with the addition of Project traffic. Worksheets for EAP (2024) traffic conditions off-ramp queueing analysis are provided in Appendix I.

Table 22: Freeway Off-Ramp Queueing Summary for EAP (2024) Conditions

Intersection	Movement	Available Stacking Distance	95 th Percentile Queue (Feet)		Acceptable? ¹	
			AM Peak	PM Peak	AM	PM
Riverside Avenue and I-10 WB Ramps	WBL	450	275	266	Yes	Yes
	WBL/T/R	1,200	228	213	Yes	Yes
	WBR	330	136	190	Yes	Yes
Riverside Avenue and I-10 EB Ramps	EBL	1,350	266	386 ²	Yes	Yes
	EBL/T/R	1,350	245	319 ²	Yes	Yes
	EBR	325	202	271 ²	Yes	Yes
Notes: WBL = West Bound Left; WBL/T/R = westbound left/through/right turn lane; WBR = West Bound Right; EBL = East Bound Left; EBL/T/R = eastbound left/through/right turn lane; EBR = East Bound Right ¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 25 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable. ² 95th percentile volume exceeds capacity; queue may be longer. Queue shown is maximum after two cycles. Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.						

Project Deficiencies and Recommended Improvements

The study area intersections are anticipated to operate at an acceptable LOS with the addition of project traffic. As such, no additional improvements aside from those that are needed to facilitate site access have been recommended.

EAPC (2024) Conditions

Roadway Improvements

The lane configurations and traffic controls assumed to be in place for EAPC (2024) conditions are consistent with those shown on Exhibit 3-1 of the TA, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the proposed project to provide site access are also assumed to be in place for EAPC conditions only (e.g., intersection and roadway improvements along the project's frontage and driveways).
- If applicable, driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for EAPC conditions only.

This scenario includes Existing traffic volumes plus an ambient growth factor of 4.04 percent plus traffic from pending and approved but not yet constructed known development projects in the area in conjunction with the addition of Project traffic. The weekday ADT and weekday peak-hour volumes which can be expected for EAPC (2024) traffic conditions are shown on Exhibit 6-1 of the TA (Appendix I).

EAPC (2024) Traffic Volume Forecasts

Intersection Operational Analysis

LOS calculations were conducted for the study intersections to evaluate their operations under EAPC (2024) traffic conditions with roadway and intersection geometrics consistent with Section 6.1 Roadway Improvements. As shown on Table 23 below, the following study area intersections are anticipated to operate at an unacceptable LOS under EAPC (2024) traffic conditions:

- Riverside Avenue and I-10 EB Ramps (No. 7)—LOS E AM peak-hour; LOS F PM peak-hour.
- Riverside Avenue and Slover Avenue (No.8)—LOS F AM and PM peak-hours.

The intersection operations analysis worksheets for EAPC (2024) traffic conditions are included in Appendix 6.1 of the TA (Appendix I).

Table 23: Intersection Analysis for EAPC (2024) Conditions

No.	Intersection	Traffic Control	Delay*(seconds)		Level of Service	
			AM	PM	AM	PM
1	Driveway 1 and Santa Ana Avenue	CSS	10.5	9.7	B	A
2	Driveway 2 and Santa Ana Avenue	CSS	11.9	12.1	B	B

No.	Intersection	Traffic Control	Delay*(seconds)		Level of Service	
			AM	PM	AM	PM
3	Lilac Avenue and Santa Ana Avenue	CSS	16.0	14.9	C	B
4	Lilac Avenue and Driveway 3	CSS	10.5	9.9	B	A
5	Willow Avenue and Santa Ana Avenue	AWS	10.0	10.2	A	B
6	Riverside Avenue and I-10 WB Ramps	TS	40.8	33.7	D	C
7	Riverside Avenue and I-10 EB Ramps	TS	70.0	99.0	E	F
8	Riverside Avenue and Slover Avenue	TS	162.4	153.5	F	F
9	Riverside Avenue and Santa Ana Avenue	TS	41.4	45.4	D	D

Notes:

WB = West Bound; EB = East Bound; CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; **CSS** = Improvement

* Per the Highway Capacity Manual (6th Edition), overall average intersection delay and LOS are shown for intersection with a traffic signal, or all way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement (or movements sharing a single lane) are shown.

Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.

Off-Ramp Queueing Analysis

Queueing analysis findings for EAPC (2024) traffic conditions are shown on Table 24 below. As shown on Table 24, there are no movements that are anticipated to experience queueing issues during the weekday AM or weekday PM peak 95th percentile traffic flows under EAPC (2024) traffic conditions. Worksheets for EAPC (2024) traffic conditions off-ramp queueing analysis are provided in Appendix 6.2 of the TA (Appendix I).

Table 24: Freeway Off-Ramp Queueing Summary for EACP (2024) Conditions

Intersection	Movement	Available Stacking Distance	95th Percentile Queue (Feet)		Acceptable? ¹	
			AM	PM	AM	PM
Riverside Avenue and I-10 WB Ramps	WBL	450	537 ^{2,3}	398 ²	Yes	Yes
	WBL/T/R	1,200	484 ²	323 ²	Yes	Yes
	WBR	330	421 ^{2,3}	272	Yes	Yes
Riverside Avenue and I-10 EB Ramps	EBL	1,350	582 ²	536 ²	Yes	Yes
	EBL/T/R	1,350	598 ²	470 ²	Yes	Yes
	EBR	325	489 ^{2,3}	422 ^{2,3}	Yes	Yes

Notes: WBL = West Bound Left; WBL/T/R = westbound left/through/right turn lane; WBR = West Bound Right; EBL = East Bound Left; EBL/T/R = eastbound left/through/right turn lane; EBR = East Bound Right

¹ Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 25 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

² 95th percentile volume exceeds capacity; queue may be longer. Queue shown is maximum after two cycles.

Intersection	Movement	Available Stacking Distance	95th Percentile Queue (Feet)		Acceptable? ¹	
			AM	PM	AM	PM
³ Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-10 mainline. Source: Urban Crossroads. Santa Ana & Lilac Warehouse. Traffic Analysis. April 19, 2023.						

Traffic Signal Warrant Analysis

The traffic signal warrant analysis for EAPC (2024) traffic conditions are based on the peak-hour volumes or planning level ADT volume-based traffic signal warrants. No study area intersections are anticipated to meet either peak-hour volume or ADT volume-based warrants for EAPC traffic conditions (see Appendix 6.3 of the TA [Appendix I]).

Near-Term Deficiencies and Recommended Improvements

Recommended Improvements to Address Deficiencies at Intersections

The effectiveness of the recommended improvement strategies to address EAPC (2024) traffic deficiencies are presented in Table 25. The applicant shall contribute to these improvements through payment of regional DIF fees or fair share contribution as identified on Table 26. Improvements shown in Table 25 are consistent with both the planned Riverside Avenue South Street Reconstruction Project and the I-10/Riverside Avenue Freight Improvement Project (Phase 2). Worksheets for EAPC (2024) conditions, with improvements, HCM calculation worksheets are provided in Appendix 6.4 of the TA (Appendix I).

Recommended Improvements to Address Deficiencies on Off-Ramp Queues

As shown previously on Table 24, there are no movements that are anticipated to experience queueing issues during the weekday AM or weekday PM peak 95th percentile traffic flows for EAPC (2024) traffic conditions. As such, no improvements have been recommended.

Table 25: Intersection Analysis for EACP (2024) Conditions With Improvements

No.	Intersection	Traffic Control	Intersection Approach Lanes ¹												Delay ² (secs.)		LOS	
			NB			SB			EB			WB						
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
7	Riverside Avenue and I-10 EB Ramps																	
	Without Improvements	TS	0	3	0	2	2	0	1	1	1	0	0	0	70.0	99.0	E	F
	With Improvements	TS	0	5	0	2	2	0	1	1	1	0	0	0	35.6	27.7	D	C

No.	Intersection	Traffic Control	Intersection Approach Lanes ¹												Delay ² (secs.)		LOS	
			NB			SB			EB			WB						
			L	T	R	L	T	R	L	T	R	L	T	R	AM	PM	AM	PM
8	Riverside Avenue and Slover Avenue																	
	Without Improvements	TS	1	2	0	1	2	0	1	2	0	1	2	0	162.4	153.5	F	F
	With Improvements ^{3,4}	TS	1	3	0	1	3	1	1	2	0	1	2	0	40.4	47.6	D	D

Notes:

BOLD = LOS does not meet the applicable jurisdictional requirements (I.e., unacceptable LOS); TS = Traffic Signal
L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; >> = Free Right Turn Lane; 1 = Improvement

¹ When is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

² Per the Highway Capacity Manual 6th Edition, overall average intersection delay and LOS are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and LOS for the worst individual movement.

³ Improvement includes modifying the traffic signal from permissive left turn phasing to protected left turn phasing on the EB/WB approaches.

⁴ Improvement includes modifying the traffic signal to implement overlap phasing on the southbound right turn lane.

Source: Urban Crossroads. Santa Ana and Lilac Warehouse. Traffic Analysis. April 19, 2023.

Local and Regional Funding Mechanisms

Transportation improvements within the City are funded through a combination of direct project mitigation, DIF programs or fair share contributions, such as the City of Rialto DIF program. Identification and timing of needed improvements is determined through local jurisdictions based upon a variety of factors.

City of Rialto Development Impact Fee

In 2006, the City of Rialto adopted their DIF program incorporating the regional component of Measure I. The fee schedule was updated in June 2021. Fees from new residential, commercial and industrial development are collected to fund Measure I compliant regional facilities. Under the City's DIF program, the City may grant project applicants a credit against specific components of fees when those applicants construct certain facilities and landscaped medians identified in the list of improvements funded by the DIF program.

After the City's DIF fees are collected, they are placed in a separate interest-bearing account pursuant to the requirements of Government Code sections 66000 et seq. The timing to use the DIF fees is established through periodic capital improvement programs which are overseen by the City's Public Works Department. Periodic traffic counts, review of traffic accidents, and a review of traffic trends throughout the City are also periodically performed by City staff and consultants. The City uses this data to determine the timing of the improvements listed in its facilities list.

Based on the City's current DIF schedule, the proposed project will be paying a total of \$848,820 toward the Regional Traffic Fee and Street Medians Fee. The Industrial Regional Traffic Fee is \$2.80 per square foot and at 301,000 square feet is \$842,800. The Street Medians Fee is \$20 per thousand

square feet and at 301,000 square feet is \$6,020. The DIF fee for Regional Traffic and Street Medians is \$848,820.

Measure “I” Funds

In 2004, the voters of San Bernardino County approved the 30-year extension of Measure “I,” 0.5 of 1 percent sales tax on retail transactions, through the year 2040, for transportation projects including, but not limited to, infrastructure improvements, commuter rail, public transit, and other identified improvements. The Measure “I” extension requires that a regional traffic impact fee be created to ensure development is paying its fair share. A regional Nexus study was prepared by the San Bernardino County Transportation Authority (SBCTA) and concluded that each jurisdiction should include a regional fee component in their local programs in order to meet the Measure “I” requirement. The regional component assigns specific facilities and cost sharing formulas to each jurisdiction and was most recently updated in November 2021. Revenues collected through these programs are used in tandem with Measure “I” funds to deliver projects identified in the Nexus Study. While Measure “I” is a self-executing sales tax administered by SBCTA, it bears discussion here because the funds raised through Measure “I” have funded in the past and will continue to fund new transportation facilities in San Bernardino County.

Fair Share Contribution

Project improvements may include a combination of fee payments to established programs, construction of specific improvements, payment of a fair share contribution toward future improvements or a combination of these approaches. Improvements constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate (to be determined at the City’s discretion).

When off-site improvements are identified with a minor share of responsibility assigned to proposed development, the approving jurisdiction may elect to collect a fair share contribution or require the development to construct improvements. Detailed fair share calculations, for each peak-hour, has been provided on Table 26 below for the applicable deficient study area intersections.

There are two regional projects that are either underway or are under construction:

- I-10/Riverside Avenue Freight Improvement (Phase 2) is currently in its final design and right-of-way acquisition phase which is anticipated to be completed in October 2023 and a current construction completion date of February 2026. This project would include extending the existing dual northbound left turn lanes over the Union Pacific Railroad (UPRR) overcrossings as well as accommodating a continuous sidewalk along Riverside Avenue between the ramps and Slover Avenue. The total cost of the interchange improvement project is \$35.5 million with \$19.8 million coming from the Trade Corridor Enhancement Program (TECP) and a local match of \$15.7 million. Of the \$15.7 million, the City is responsible for 65.9 percent of this total, or \$10,346,300. However, it is uncertain whether some or all of this is accounted for in the City’s current DIF program.
- Riverside Avenue Street Reconstruction Project (South) is anticipated to be completed in 2023. This project includes providing an overlay and reconstruction of Riverside Avenue

between I-10 and the Santa Ana River. Specifically, the project includes upgrades of existing and construction of new ADA compliant curb ramps, reconstruction of sidewalks/driveways/curbs/gutters, underground utilities will be adjusted to new roadway surface grades, and additional intersection lane enhancements at Slover Avenue, Santa Ana Avenue, and Industrial Drive/Resource Avenue. The cost for this project is \$9.6 million which is funded through Gas Tax and Measure I, but there is no indication if any or all of the improvements are included in the City's current DIF program.

According to the TA, based on the project fair share percentages shown in Table 26 and the costs identified above, the project applicant shall pay the following fair share contribution:

- Riverside Avenue at I-10 Eastbound Ramps: \$10,346,300 x 4.0% = \$410,182
- Riverside Avenue at Slover Avenue: \$9,600,000 x 4.6% = \$438,223
- Total = \$848,405

A fair share of \$848,405 has been identified based on the costs associated with the proposed improvements. The City's DIF Nexus Study could not be obtained in order to verify the improvements included in the DIF program and calculate the proposed project's fair share of improvements not included in the pre-existing fee program. As such, the project applicant should work with the City to determine the improvements and dollar amount covered by the City's pre-existing DIF program. The project applicant would be required to pay \$848,820 based on the City's current DIF schedule (Regional Traffic Fee and Street Medians Fee). Once the appropriate fair share amount has been determined, the project applicant shall be required to pay the fair share amount to the City prior to the issuance of building permits.

Table 26: Project Fair Share Calculations

No.	Intersection	Existing	Project	2024 With Project	Total New Traffic	Project % of New Traffic
7	Riverside Avenue and I-10 EB Ramps					
	AM:	3,519	72	5,460	1,941	3.7%
	PM	4,080	76	5,997	1,917	4.0%
8	Riverside Avenue and Slover Avenue					
	AM	2,965	72	4,610	1,645	4.4%
	PM	3,541	75	5,184	1,643	4.6%
Notes: EB = East Bound BOLD = Highest fair share percentage is highlighted Source: Urban Crossroads. Santa Ana and Lilac Warehouse. Traffic Analysis. April 19, 2023.						

Transit Service

The City is served by Omnitrans, a public transit agency serving various jurisdictions within San Bernardino County. Based on a review of the transit routes within the vicinity of the proposed project, there are currently no routes that operate within the TA study area. Transit service is reviewed and updated by Omnitrans periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. As such, it is recommended that the project applicant work in conjunction with Omnitrans to potentially provide bus service to the site.

Bicycle and Pedestrian Facilities

Exhibit 3-5 of the TA illustrates the City's existing and future planned bicycle facilities per the City's Bicycle and Pedestrian Master Plan (2016), which an on-street Class II (striped) bike path along Riverside Avenue and Santa Ana Avenue within the study area. Existing pedestrian facilities within the study area are shown on Exhibit 3-6 of the TA. Field observations and traffic counts conducted in February 2022 indicate moderate pedestrian and bicycle activity within the study area (when the traffic counts were conducted).

Truck Routes

Exhibit 3-4 of the TA identifies the City's truck routes. Riverside Avenue and Santa Ana Avenue are identified as truck routes. For the purposes of the TA, the Riverside Avenue and Santa Ana Avenue truck routes have been utilized to route truck traffic associated with the proposed project and future cumulative development projects. An interim Urgency Ordinance (No. 1673) was adopted by the City on December 13, 2022, which established a moratorium to prohibit truck traffic on all other streets within the City except as otherwise noted on Exhibit 3-5 of the TA or as provided by law. Specifically, Exhibit 3-5 identifies the allowable truck routes and the previous truck routes that have been removed by the Interim Urgency Ordinance.

VMT Analysis

Urban Crossroads prepared a VMT Analysis based on the City of Rialto Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. The City Guidelines provide details on appropriate screening thresholds, that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed analysis. The City utilizes the SBCTA VMT Screening Tool, which allows users to select an APN to determine whether a project's location meets one or more of the screening thresholds for land use projects identified in the City's Guidelines.

Screening thresholds are broken into the following three types:

- Step 1: Transit Priority Area (TPA) Screening
- Step 2: Low VMT Area Screening
- Step 3: Project Type Screening

A land use project only needs to meet one of the above screening thresholds to result in a less than significant impact.

The proposed project does not meet the TPA screening criteria as the site is not located within 0.50 miles of an existing major transit stop or along a high quality transit corridor. Furthermore, it does not meet the floor area ratio (FAR) threshold of 0.75 or greater.

The proposed project does not meet the Low VMT Area screening criteria as it is not located within a low VMT generating zone. Furthermore, the proposed project does not meet the Project Type screening criteria as its square footage exceeds the 63,000-square-foot warehousing screening size identified by the City of Rialto Guidelines. Because the proposed project does not meet any of the City's VMT screening criteria, a project level VMT analysis was prepared to assess the project's potential impact to VMT.

VMT Modeling

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

VMT Metric and Significance Threshold

Through consultation with City staff, it was identified that the appropriate VMT metric for employment generating industrial land uses to be utilized for the purposes of this VMT Analysis is VMT per employee. As noted in the City Guidelines, the proposed project would result in a significant project-generated VMT impact if either of the following conditions is met for industrial projects:

- Baseline project-generated VMT per employee exceeds the County of San Bernardino VMT per employee, or
- Cumulative project-generated VMT per employee exceeds the County of San Bernardino VMT per employee.

SBCTA provides VMT calculations for each of its member agencies and for the baseline County of San Bernardino region. Urban Crossroads obtained this published data from SBCTA, which for the County of San Bernardino is 17.35 VMT per employee for 2022.

Project Land Use Conversion

In order to evaluate project VMT, standard land use information must first be converted into a SBTAM compatible data set. The SBTAM model utilizes socioeconomic data (SED) (e.g., population, households, employment, etc.) instead of land use information for the purposes of vehicle trip estimation. Project land use information such as building square footage must first be converted to SED for input into SBTAM. Adjustments in SED have been made to the appropriate Traffic Analysis

Zone (TAZ) within the SBTAM model to reflect the project’s proposed land uses (i.e., warehouse). Table 27 summarizes the employment estimates for the proposed project. It should be noted that the employment estimates are consistent with the employment density factors identified in the Southern California Association of Governments (SCAG) Employment Density Study.¹¹³

Table 27: Employment Estimates

Land Use	Sample Quantity (Square Feet)	Employment Density Factor ¹	Estimated Employees
Warehouse	301,000	1,195 square feet per employee	252
Notes: ¹ Table II-B of the SCAG Employment Density Study. Source: Urban Crossroads 2022.			

Project-Generated VMT Per Employee Calculation

Adjustments to employment for the project’s TAZ were made to the SBTAM base year (2016) and cumulative year (2040) traffic models, and each model was then run inclusive of the SED factors. The ability to capture commute trips can be achieved with the SBTAM model by using the Production/Attraction (PA) trip matrices exclusive of truck trips.¹¹⁴ Using these matrices, the HBW VMT was calculated for both the base year (2016) and cumulative year (2040) conditions. The HBW VMT is then normalized by dividing by the project employees. The results of the base year and cumulative year conditions were calculated for baseline (2022) conditions using straight-line interpolation. As shown in Table 28 below, the Project’s baseline VMT per employee is 13.80 and cumulative VMT per employee is 13.37.

Table 28: Project VMT Per Employee

Category	Base Year (2016)	Cumulative Year (2040)	Baseline (2022)
Employees	252	252	252
VMT	3,512	3,370	3,477
VMT Per Employee	13.94	13.37	13.80
Notes: Source: Urban Crossroads 2022.			

¹¹³ Southern California Association of Governments (SCAG). 2001. Employment Density Study. October.

¹¹⁴ CEQA Guidelines Section 15064.3, subdivision (a) states “For purposes of this section “vehicle miles traveled” refers to the amount and distance of automobile travel attributable to a project.” The OPR’s Technical Advisory indicates that, although heavy truck traffic can be included for analysis convenience, the provided analysis requirements are specific to passenger vehicles and light-duty trucks. While it may be appropriate to consider heavy vehicle traffic (HDT) if directed by the lead agency, it is generally understood that Interstate commerce and related heavy vehicle traffic are regulated by the Federal government as it relates to commerce. Irrespective of this and considering that the end user may not be known at this time, it is reasonable to assume that the ultimate end user will select locations, at least in part, as to how it effects their transportation costs. Accordingly, it is reasonable to assume that industrial buildings are often located in a manner to reduce VMT given that it is in the interest of the business. In most cases, Consistent with other CEQA technical studies, HDT VMT will be reflected in other applicable technical studies (e.g., Air Quality Impact Analysis, Greenhouse Gas Analysis etc.

Project Comparison to Significance Threshold

Table 29 below illustrates the comparison between project’s baseline and cumulative VMT per employee to the City’s impact threshold. SBCTA provides published VMT values for its member agencies for the baseline County of San Bernardino, which is 16.9 VMT per employee.

Table 29: Project VMT Per Employee Comparison

Category	Baseline	Cumulative
Impact Threshold	16.9	16.9
Project	13.80	13.37
Percent Change	-18.34%	-20.89%
Potentially Significant?	No	No
Notes: Source: Urban Crossroads, 2022		

Project-generated VMT per employee would not exceed the City’s impact threshold for both baseline and cumulative conditions, therefore, the proposed project’s impact to VMT is less than significant.

Project’s Cumulative Effect on VMT

The City Guidelines consistent with the Technical Advisory states that cumulative impacts on VMT “... metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impact that utilize plan compliance as a threshold of significance.” The proposed project is consistent with the City’s underlying General Plan land use assumptions and was found to have a less than significant impact at the project level. Therefore, the project is also considered to be less than significant under cumulative conditions.

Would the project:

- a) **Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Less than significant impact with mitigation incorporated. As mentioned above, auto delay, on its own, is no longer an environmental impact under CEQA (See PRC § 21099(b)(2).) However, within the context of addressing a project’s potential consistency with plans, ordinances, and policies, project changes to LOS at an intersection(s) that result in a potential safety impact or hazardous condition are appropriately analyzed pursuant to CEQA.

The project-specific TA analyzed impacts to the project area under Existing (2022) Conditions, EAP (2024) Conditions, and EAPC (2024) Conditions. There are no movements under EAP (2024) Conditions that are anticipated to experience queueing issues during weekday AM or PM peak 95th percentile traffic flows and all of the study area intersections are anticipated to continue to operate at an acceptable LOS under EAP (2024) or EAPC (2024) traffic conditions. However, it was determined that the intersection of Riverside Avenue and Slover Avenue would operate at an unacceptable LOS (LOS F during the AM and PM peak-hour), as well as the intersection of Riverside Avenue and I-10 Eastbound Ramps (LOS E during AM peak-hour and LOS F under PM peak-hour) under EACP (2024) Conditions. To accommodate site access and maintain acceptable peak-hour operations for the proposed project, the proposed project shall implement the TA recommendations based on the minimum improvements needed. These include recommended improvements for project driveways 1 and 2, Santa Ana Avenue, and Lilac Avenue, as detailed in MM TRANS-1. To mitigate impacts under EAPC (2024) Conditions to the two impacted intersections in the project area, the proposed project shall participate in the payment of Fair Share contribution for improvements at the intersections of Riverside Avenue and I-10 Eastbound Ramps and Riverside Avenue and Slover Avenue, included as MM TRANS-2. Implementation of MM TRANS-1 and MM TRANS-2 would ensure that the project would comply with General Plan Policies related to maintenance of LOS D or better, and would ensure that vehicular movements at unsignalized intersections do not operate with an average delay greater than 120 seconds, as outlined in Policy 4-1.21.

Furthermore, the proposed project would comply with applicable provisions of the Rialto General Plan related to bicycle and pedestrian friendliness, through the provision of bicycle parking to promote bicycle use among employees, provision of walkways, adequate lighting, street trees and landscaping. With implementation of MM TRANS-1 and MM TRANS-2, and compliance with applicable General Plan Policies, the project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As such, impacts would be less than significant with mitigation incorporated.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than significant impact. As described above, the proposed project did not meet any of the City's VMT screening criteria and, as required by City Guidelines, a project level VMT analysis was performed. The project level VMT analysis determined that VMT generated per employee did not exceed the City's impact threshold. Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than significant impact. The proposed project consists of the construction of a warehouse facility in an area surrounded predominantly by existing development. The project is linear in nature does not include any sharp turns, dangerous intersections, or incompatible uses. As such, the

proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less than significant impact. The proposed project consists of the construction of a warehouse facility. The proposed project includes two driveways along Santa Ana Avenue and one driveway along Lilac Avenue, which would allow for adequate access in the event of an emergency. The proposed project would not permanently close any of the streets fronting the project during construction, and therefore would not impede emergency access. Furthermore, trucks associated with the proposed project would be required to adhere to designated truck routes within the City. As such, impacts would be less than significant.

Mitigation Measures

MM TRANS-1 Implementation of Roadway Improvements

The proposed project shall implement the following improvements:

- Driveway 1 and Santa Ana Avenue: install stop control on the northbound approach and the westbound left turn lane would be accommodated within the painted median. This driveway shall align with the existing driveway on the north side of Santa Ana Avenue.
- Driveway 2 and Santa Ana Avenue: install stop control on the northbound approach and the westbound left turn lane shall be accommodated within the painted median. This driveway shall align with the existing driveway on the north side of Santa Ana Avenue.
- Lilac Avenue and Santa Ana Avenue: Based on the frontage roadway improvements to be implemented by the proposed project, the intersection shall be modified to accommodate a dedicated eastbound left turn lane (within the painted median) and accommodate a single eastbound through lane (until such time Santa Ana Avenue is widened to its ultimate to the east of Lilac Avenue and can accommodate the receiving lanes for a second through lane).
- Lilac Avenue and Driveway 2: install stop control on the eastbound approach.
- Lilac Avenue: construct Lilac Avenue at its ultimate half-section width as a Collector (64-foot right-of-way) from Santa Ana Avenue to the project's southern boundary consistent with the City's standards. There are no bicycle lanes planned adjacent to the proposed project along Lilac Avenue, however, the proposed project shall implement a 5-foot sidewalk and a landscaped area between the sidewalk and roadway curb along its frontage consistent with the Collector cross section.
- Santa Ana Avenue: construct Santa Ana Avenue at its ultimate half-section width as a Secondary Highway (88-foot right-of-way) from the project's western boundary to Lilac Avenue consistent with the City's standards. Santa Ana Avenue is designated as a Class II (on-street, striped) bike route, in addition, the proposed

project shall implement sidewalk and landscaping improvements along its frontage consistent with the Secondary Highway cross section.

On-site traffic signing and striping shall be implemented consistent with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the project site.

MM TRANS-2 Payment of Fees

Prior to the issuance of building permits, the project applicant shall pay the proposed project's appropriate fair share amount associated with the proposed improvements. A fair share amount of \$848,405 has been identified based on the costs associated with the proposed improvements. However, it is unclear what percentage or amount of these improvements are covered by the City's existing Development Impact Fee (DIF) program. The City's DIF Nexus Study could not be obtained in order to verify the improvements included in the DIF program and calculate the proposed project's fair share improvements not included in a pre-existing fee program. As such, the project applicant should work with the City to determine the improvements and dollar amount covered by the City's pre-existing DIF program. The project applicant will be required to pay \$842,800 based on the City's current DIF fee schedule (Regional Traffic Fee and Street Medians Fee). Once the appropriate fair share amount has been determined, the project applicant shall be required to pay the fair share amount to the City of Rialto.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2.18 Utilities and Service Systems <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Evaluation

Setting

Water Supply

The WVWD provides potable water to the City of Rialto and the project site. The WVWD serves approximately 82,000 customers within Bloomington, Colton, Fontana, Rialto, unincorporated areas of San Bernardino County, and Jurupa Valley in Riverside County.¹¹⁵ The WVWD utilizes water from five underground basins, surface water from Lytle Creek, and State Water Project through San Bernardino Valley Municipal Water District. Over half of the District's water supply is from WVWD local groundwater wells. The WVWD extracts groundwater from five regional groundwater basins: Bunker Hill and Lytle Creek, Rialto-Colton, Riverside North, and Chino Basins.¹¹⁶ According to the 2020 Upper Santa Ana River Watershed Integrated Urban Water Management Plan (IUWMP) water

¹¹⁵ West Valley Water District. 2018. Service Area. Website: <https://wvwd.org/customers/service-information/>. Accessed July 12, 2022.

¹¹⁶ West Valley Water District. 2018. Sources of Supply. Website: <https://wvwd.org/about/overview/>. Accessed July 12, 2022.

service reliability analysis, the WVWD does not anticipate any shortage due to single or consecutive dry years.¹¹⁷

Wastewater

Rialto Water Services provides wastewater service to the City and the project site. The Rialto Water Service treats wastewater at its facility on Santa Ana Avenue. The Rialto Wastewater Treatment Plant treats domestic and commercial/industrial wastewater generated within the City of Rialto and portions of the City of Fontana. The combined total treatment design capacity of the plant is over 12 mgd.¹¹⁸

Solid Waste

Burrtec Disposal provides solid waste removal service to the City of Rialto and the project site. Burrtec operates five material recovery facilities in Southern California that provide sorting services for solid waste in order to divert recyclables and other unsuitable waste from landfills.¹¹⁹ The City of Rialto's solid waste is delivered to the Mid-Valley Sanitary Landfill located within city limits.¹²⁰ According to California's Department of Resource Recycling and Recovery (CalRecycle), the Mid-Valley Landfill is permitted to receive up to 7,500 tons of solid waste per day and had a remaining capacity of 61,219,377 cubic yards in 2019.¹²¹

Electric Power, Natural Gas, and Telecommunications

Southern California Edison (SCE) provides electric power service to the City of Rialto and the project site. Southern California Gas Company (SoCalGas) provides natural gas service to the project site. AT&T provides telecommunications service to the City of Rialto and the project site.

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less than significant impact. The project site is currently, and will continue to be, served by a variety of utility providers for electricity, natural gas, potable water, wastewater, solid waste, and telecommunications.

Water

As discussed above, the WVWD would provide water to the proposed project. On May 6, 2022, WVWD issued a "Will Serve" letter informing the project applicant that WVWD would be capable of providing domestic water service to the proposed project (Appendix J). On Santa Ana Avenue, one

¹¹⁷ Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. 2020. Part 2: Local Agency UWMPs, Chapter 10.

¹¹⁸ City of Rialto. 2010. Rialto General Plan, Investing in Our Future: Economic Development, Redevelopment, and Infrastructure. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 12, 2022.

¹¹⁹ Burrtec. 2022. Our Facilities. Website: <https://www.burrtec.com/our-facilities/>. Accessed July 12, 2022.

¹²⁰ City of Rialto. 2010. Rialto General Plan, Investing in Our Future: Economic Development, Redevelopment, and Infrastructure. Website: <https://yourrialto.com/DocumentCenter/View/1494/2010-General-Plan>. Accessed July 12, 2022.

¹²¹ California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility/Site Activity Details Mid-Valley Sanitary Landfill. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1880?siteID=2662>. Accessed July 12, 2022.

10-inch fire water service, one 3-inch domestic service, and one 2-inch irrigation service would be extended to the property line from the water main. On Lilac Avenue, one 10-inch fire service line extended from the main would be provided. Removal of existing connections and construction of new connections would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impacts.

Wastewater

The proposed project would be served by the public sanitary sewer located in Santa Ana Avenue. Wastewater flows collected from the project site would discharge to an on-site, private sewer lift station located in the northeast corner of the project site. Wastewater would ultimately be discharged to the existing public sanitary sewer line in Santa Ana Avenue. Construction of new connections would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impacts. As described further in impact 2.18©, the wastewater treatment provider serving the proposed project would have adequate capacity to serve the proposed project. Consequently, the City of Rialto issued a “Will Serve” letter on May 3, 2022, informing the project applicant of the City’s capability to provide sewer services to the proposed project (Appendix J).

Stormwater Drainage

The proposed project would install an on-site storm drain system consisting of ribbon gutters, catch basin inlets, and underground pipes. Runoff would be directed toward and underground infiltration basin located within the drive aisle around the site. Stormwater quality low-flows from the site are expected to be retained and infiltrated into the native soil while the excess overflow would be released toward Lilac Avenue and the southerly drainage channel. In terms of drainage and stormwater quality, the proposed project would be designed to conform to the requirements of the San Bernardino County Hydrology Manual, and Santa Ana Regional Water Quality Control Board Order No. R8-2002-0012 (NPDES Permit No. CAS618036) and relevant design will be documented in technical report formats (i.e.—WQMP and Drainage Report). As detailed in the PWQMP prepared for the proposed project, and in in Section 2.10, Hydrology and Water Quality, on the proposed project would include three underground infiltration basins which would capture runoff from the project site. Storm overflows would be directed to existing channel along the south of the property.

Electric Power, Natural Gas, and Telecommunications

The proposed project would connect to electricity and telecommunication facilities located near the project site. Electricity and natural gas connections would be coordinated with SCE and SoCalGas. Construction of these connections would be required to abide by applicable federal, State, and local regulations, as well as mitigation measures outlined in this document, to avoid significant environmental impact.

In summary, the proposed project would not require the relocation or construction of new water, wastewater, storm drainage, electrical power, natural gas, or telecommunications facilities outside of those proposed on-site and considered within this Draft IS/MND. Therefore, impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than significant impact. In 2020, Industrial uses in the WVWD's service area consumed an estimated 623 AF of water in a year, which is approximately 3.09 percent of the 2020 water use in the WVWD's service area. Industrial water use is projected to increase to 909 AF of water in 2045, an increase of over 45 percent. As mentioned above, the WVWD does not anticipate any shortages due to single or consecutive dry years.¹²² The proposed project would employ approximately 252 employees on-site, which is expected to be sourced from the City's existing workforce. The proposed project includes an approximately 300,920-gross-square-foot building with a 294,000-square-foot warehouse, 3,500-square-foot mezzanine, and 7,000-square-foot office as well as approximately 75,989 square feet of landscaping. As described in Impact 2.11, Land Use and Planning, the proposed project would be consistent with the existing General Plan land use designation and zoning and would be considered a planned use. As a result, the water demand associated with the proposed project would have been analyzed in both the City of Rialto General Plan Update as well as the 2020 IUWMP. Additionally, the proposed project would reduce potential water demand from landscaping by installing a low flow irrigation system to ensure that water efficiency would meet or surpass the current State-mandated AB 1881 Water Efficient Landscape Ordinance, which is included in the Rialto Municipal Code under 12.50.060, Water Efficient Landscape Requirements. Therefore, impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than significant impact. As noted above, the City of Rialto issued a Will Serve Letter on May 2, 2022, stating that the City has the capability to provide sewer services to the proposed project (Appendix J). Further, the Rialto Wastewater Treatment Plant processes up to 12 mgd of wastewater. Utilizing a sewage generation rate of 20 gpd per 1,000 square feet of warehouse space and a rate of 150 gpd per 1,000 square feet of office space, the proposed project is anticipated to produce approximately 6,930 gpd of wastewater.^{123, 124} Prior to project approval, the City of Rialto Department of Engineering, would verify that existing wastewater treatment and collection facilities could accommodate the wastewater that would be generated by the proposed project. On-site sewer improvements and connections would be provided in consultation with the Rialto Water Services Department, with the project applicant responsible for payment of all sewer facility improvements and connection fees as set forth in Title 3, Revenue and Finance, Chapter 3.33, Development Impact Fees, Section 3.33.240, Sewage Collection Facilities Development Impact Fee, and Section 3.33.250, Sewage Treatment Facilities Development Impact Fee, of the Municipal Code. In addition, the proposed project would be consistent with the General Plan land use designation

¹²² Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan. 2020. Part 2: Local Agency UWMPs, Chapter 10.

¹²³ City of Los Angeles. 2006. CEQA Thresholds Guide. Exhibit M.2-12, Sewage Generation Factors. Website: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>. Accessed November 9, 2022.

¹²⁴ $(150 * 7) = 1,050$, $(20 * 294) = 5,880$, $(1,050 + 5,880) = 6,930$

and zoning and would not include uses that typically release significant volumes of wastewater, such as heavy industrial uses. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than significant impact. As described previously, the proposed project's solid waste disposal would be handled by Burrtec Disposal. The landfill that would receive the proposed project's solid waste is the Mid-Valley Landfill, which is permitted to receive up to 7,500 tons of solid waste per day and had a remaining capacity of 61,219,377 cubic yards in 2019. Based on the Industrial Sector solid waste generation rate of 1.42 pounds per 100 square feet of warehouse space per day and 6 pounds per 1,000 square feet of office per day provided by CalRecycle,¹²⁵ the proposed project is anticipated to produce approximately 3,578 pounds, or 1.79 tons, of solid waste per day.¹²⁶ The Mid-Valley Landfill's remaining capacity is sufficient to accommodate solid waste generated as a result of the proposed project. Consistent with California State AB 341 and AB 1826, the proposed project would be required to provide a recycling program that would divert recyclables and organic recyclable materials, such as yard trimmings, from landfills. Project waste diversion measures would contribute toward achieving a 50 percent waste diversion as mandated by the California Integrated Waste Management Act. As a result, the proposed project would not generate solid waste in excess of State or local standards or exceed the capacity of local infrastructure. As such, impacts would be less than significant.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than significant impact. Solid waste disposal would follow the requirements of the franchised waste hauler, Burrtec Disposal, which must adhere to federal, State, and local statutes and regulations related to the collection of solid waste. The proposed project would comply with all State and local waste diversion requirements including City of Rialto Municipal Code. Because solid waste disposal would be compliant with federal, State, and local statutes and regulations, impact would be less than significant.

Mitigation Measures

None required.

¹²⁵ California Department of Resources Recycling and Recovery (CalRecycle). 2019. Estimated Solid Waste Generation Rates. Website: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed July 12, 2022.

¹²⁶ $(6 * 7) = 42$, $(1.42 * 2,490) = 3,535.8$, $(3,535.8 + 42) = \sim 3,578$ lbs, $(3,578/2,000) = \sim 1.79$

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

Environmental Evaluation

Setting

A State Responsibility Area (SRA) refers to areas of the State in which the financial responsibility of preventing and suppressing fires has been determined pursuant to Section 4125, to be primarily the responsibility of the State. According to CAL FIRE, the project site is not located in a designated “Fire Hazards Severity Zone” in an SRA.¹²⁷ The nearest FHSZ is located approximately 1.26 miles southwest of the project site.

A “Very High Fire Hazard Severity Zone” (VHFHSZ) in a Local Responsibility Area (LRA) means an area designated by the Director of Forestry and Fire Protection pursuant to Government Code Section 51178 that is not an SRA. The project site is not located in a VHFHSZ in an LRA.¹²⁸ The nearest VHFHSZ is located 1.66 miles southeast of the project site. In May 2022, CAL FIRE recorded wildfire activity near the Jurupa Hills approximately 5.23 miles southwest of the project site.¹²⁹ In 2020, two wildfire incidents were recorded near the Jurupa Hills. The first occurred in September, approximately 3.42 miles southwest of the project site, and burned roughly 250 acres. The other

¹²⁷ California Department of Forestry and Fire Protection (CAL FIRE). 2022. FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed June 22, 2022.

¹²⁸ Ibid.

¹²⁹ California Department of Forestry and Fire Protection (CAL FIRE). 2022. 2022 Incident Archive. Website: <https://www.fire.ca.gov/incidents/2022/>. Accessed November 15, 2022.

wildfire event occurred in November, approximately 7.80 miles southwest of the project site, and burned roughly 150 acres.¹³⁰ 628 acres burned during a wildfire in October 2019 within the Jurupa Valley approximately 5.34 miles southwest of the project site.¹³¹

The City of Rialto adopted an Emergency Operations Plan (EOP) in 2013 which outlines the City's planned response to emergencies associated with natural disasters, technological incidents, and national security emergencies.¹³²

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. As mentioned above, the proposed project is not located within an SRA or a VHFHSZ. The proposed project would not result in any permanent road closure or narrowing in the project area that would substantially impair an emergency response plan or emergency evacuation plan. The proposed project would comply with the applicable requirements of the Rialto General Plan Safety and Noise Element, City Municipal Code, and the most recent version of the California Fire Code and Building Code and all on-site roadways and drive aisles would be a minimum width of 20 feet. The proposed project would include drive aisles approximately 26-feet wide along the north, west, and south edge of the project site and approximately 40-feet wide along the east edge of the project site. Therefore, the proposed project would not substantially impair the City of Rialto's EOP and any potential evacuation from the project site would be provided by sufficient roadways. As such, impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than significant impact. The proposed project is located in the City of Rialto in a flat, urbanized area without steep slopes. Based on historical meteorological data from the closest ARB monitoring site in Redlands, the maximum daily wind speeds in southwest San Bernardino range from 8.4 to 12.9 mph.¹³³ According to the General Plan, the City of Rialto has a history of extensive windstorms, often related to Santa Ana winds that push through the Cajon Pass. Wind events constitute one of the most frequent major hazards in the City, with winds sometimes reaching gale-force strength resulting in property damage and injury to people. Winds can also push wildland fires in the Lytle Creek area. However, this is over 14 miles north of the project site. Goal 5-12 of the General Plan aims to minimize the risks associated with wind hazards. Therefore, impacts related to slope,

¹³⁰ California Department of Forestry and Fire Protection (CAL FIRE). 2020. 2020 Incident Archive. Website: <https://www.fire.ca.gov/incidents/2020/>. Accessed November 15, 2022.

¹³¹ California Department of Forestry and Fire Protection (CAL FIRE). 2019. 2019 Incident Archive. Website: <https://www.fire.ca.gov/incidents/2019/>. Accessed November 15, 2022.

¹³² City of Rialto. 2013. City of Rialto Emergency Operations Plan. Website: <https://www.yourrialto.com/DocumentCenter/View/943/Emergency-Operations-Plan-PDF>. Accessed July 8, 2022.

¹³³ California Air Resources Board (ARB). 2022. AQMIS, Daily Maximum Resultant Windspeed for Redlands-Dearborn. Website: <https://www.arb.ca.gov/aqmis2/display.php?year=2021&mon=7&day=1&site=2077&hours=all&o3switch=new&units=012&ptype=met¶m=WINSPEED&report=SITE31D&statistic=DMAX&order=&btnsubmit=Update+Display>. Accessed July 22, 2022.

prevailing winds, and other exacerbating factors associated with wildfire risk would be less than significant.

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Less than significant impact. The proposed project would be located in an urban and developed area and is bounded by the existing roadways of Santa Ana Avenue to the north and Lilac Avenue to the east. The project site is not located in a large, unmanaged open space area that contains vegetation susceptible to wildfires. As a result, the proposed project would not require fuel brakes.

The proposed project would not require emergency water sources, because potable water is currently provided by the WVWD, which has adequate water supplies available to serve the project and future development during normal, dry, and multiple dry years. One 10-inch fire water service line on Santa Ana Avenue and one 10-inch fire water service line on Lilac Avenue would be extended to the property line from the water main the main. Public fire hydrants would be provided on both project frontages to adhere to City of Rialto spacing requirements. Further, above ground utilities within the public right-of-way would be undergrounded per the City of Rialto Municipal Code.¹³⁴ Therefore, impacts related to infrastructure that exacerbates fire risk would be less than significant.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Less than significant impact. As discussed in Section 2.7, Geology and Soils, the project site is located in a flat area surrounded by existing development and vacant land. There are no steep slopes surrounding the project site therefore the project is not subject to landslides. Additionally, the proposed is not located in a flood hazard zone. The nearest flood hazard zone is approximately 1.20 miles to the southeast and is designated as Flood Zone X.¹³⁵ This designation describes an area with a 0.2 percent annual chance flood hazard, or an area with a 1 percent annual chance flood with average depth less than one foot or with drainage areas of less than one square mile.¹³⁶ Finally, as discussed above, the proposed project is not located in a FHSZ. Additionally, adherence to State and City codes, and emergency and evacuation plans set by the City and the County of San Bernardino would prevent impacts to people or structures from risks, including downslope or downstream flooding, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

¹³⁴ City of Rialto. 2022. Title 15, Chapter 15.32, Underground Utilities. Website: https://library.municode.com/ca/rialto/codes/code_of_ordinances?nodeId=TIT15BUCO_CH15.32UNUT. Accessed July 19, 2022.

¹³⁵ Federal Emergency Management Agency (FEMA). FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search?AddressQuery=Rialto%2C%20CA#searchresultsanchor>. Accessed July 10, 2022.

¹³⁶ Ibid.

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

Environmental Evaluation

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than significant with mitigation incorporated. Implementation of mitigation as outlined in this Draft IS/MND would reduce all potentially significant impacts to less than significant. Given that all impacts can be reduced to a less than significant level with mitigation and given the proposed project's size, the incremental effects of the proposed project are not considerable relative to the effects of past, current, and probable future projects. Therefore, the proposed project would not result in cumulatively considerable impacts, and impacts would be less than significant with mitigation incorporated.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable?**
 (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than significant with mitigation incorporated. The proposed project may result in impacts associated with biological resources, cultural resources, tribal cultural resources, geology and soils, GHG emissions, noise, and traffic and transportation that would be significant if left unmitigated. Implementation of the mitigation measures outlined in this Draft IS/MND would reduce all impacts to a less than significant level.

The proposed project is consistent with local and regional plans, and its air quality emissions do not exceed established thresholds of significance. The proposed project would not cause a substantial increase in ambient noise levels or a significant increase in traffic volumes within the surrounding area. Impacts of the proposed project would be less than significant with the mitigation measures outlined in this Draft IS/MND, which would further ensure that any contribution to cumulative impacts resulting from implementation of the proposed project would be minimized. Therefore, with implementation of project-specific mitigation measures, potential cumulative impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. As described throughout the preceding checklist portion of this Draft IS/MND, the proposed project would not have any substantial environmental effects on human beings, either directly or indirectly. All impacts identified throughout this document either do not require mitigation or would be mitigated to levels that are less than significant. In addition, the proposed project would be required to comply with existing regulations as discussed throughout the Draft IS/MND. The proposed mitigation measures, once implemented, and compliance with existing regulations would ensure that no substantial adverse effects on human beings would result from the proposed project. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM TCR-1, MM TCR-2, MM TCR-3, MM TCR-4, MM GEO-1, MM GEO-2, MM GHG-1, MM GHG-2, MM GHG-3, MM NOI-1, MM TRANS-1, and MM TRANS-2.

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