

Highland East Industrial Warehouse Project Initial Study and Mitigated Negative Declaration

Lead Agency:

City of Highland
Planning Department
27215 Base Line
Highland, California 92346
909-864-6861, ext. 210



Applicant:

Crow Holdings Industrial
527 W. 7th Street, Suite 200
Los Angeles, CA 90014

Prepared by:

MIG, Inc.
1650 Spruce Street, Suite 106
Riverside, California 92507



Public Draft
October 2, 2023

- This document is designed for double-sided printing -

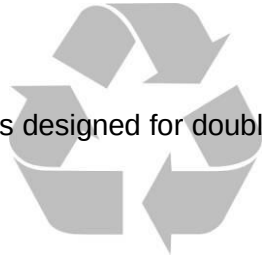


Table of Contents

1 Introduction	1
1.1 – Purpose of CEQA	1
1.2 – Public Comments	3
2 Project Description.....	4
2.1 – Project Title	4
2.2 – Lead Agency Name and Address	4
2.3 – Contact Person and Phone Number	4
2.4 – Project Location.....	4
2.5 – Project Sponsor’s Name and Address	4
2.6 – General Plan Land Use Designation.....	4
2.7 – Zoning District	4
2.8 – Project Description	5
2.9 – Surrounding Land Uses.....	8
2.10 – Environmental Setting	9
2.11 – Required Approvals	9
2.12 – Other Public Agency Whose Approval is Required	9
3 Determination	19
3.1 – Environmental Factors Potentially Affected	19
3.2 – Determination	19
4 Evaluation of Environmental Impacts.....	21
4.1 – Aesthetics.....	21
4.2 – Agriculture and Forest Resources	24
4.3 – Air Quality.....	26
4.4 – Biological Resources	43
4.5 – Cultural Resources.....	52
4.6 – Energy.....	59
4.7 – Geology and Soils	65
4.8 – Greenhouse Gas Emissions.....	69
4.9 – Hazards and Hazardous Materials.....	76
4.10 – Hydrology and Water Quality.....	82
4.11 – Land Use and Planning	85
4.12 – Mineral Resources	86
4.13 – Noise.....	87
4.14 – Population and Housing	106
4.15 – Public Services.....	107
4.16 – Recreation.....	108
4.17 – Transportation	109
4.18 – Tribal Cultural Resources	116
4.19 – Utilities and Service Systems	118
4.20 – Wildfire	121
4.21 – Mandatory Findings of Significance	122
5 Mitigation Summary	128
6 References	130
6.1 – List of Preparers	130
6.2 – Persons and Organizations Consulted	130
6.3 – Bibliography	131

List of Tables

Table 2-1 Construction Scheduling	6
Table 2-2 Project Air Quality Conditions of Approval.....	7
Table 2-3 Surrounding Land Uses	9
Table 4.3-1 Local Air Quality.....	28
Table 4.3-2 South Coast Air Basin Attainment Status	29
Table 4.3-3 Construction Activities.....	33
Table 4.3-4 Construction Emissions	33
Table 4.3-5 Operational Emissions	34
Table 4.3-6 Construction LST Impacts.....	36
Table 4.3-7 Operational LST Impacts	36
Table 4.3-8 Project-Related Cancer Risks	38
Table 4.6-1 Project Energy/GHG Conditions of Approval.....	60
Table 4.8-1 Construction GHG Emissions	72
Table 4.8-2 Operational GHG Emissions	73
Table 4.13-1 Construction Activities.....	94
Table 4.13-2 Construction Noise Impacts	95
Table 4.13-3 Noise Impacts Compared to Exterior Noise Standards	98
Table 4.13-4 General Plan Noise Element Consistency.....	100
Table 4.13-5 Potential Vibration Levels.....	102
Table 4.13-6 Construction Vibration Impacts	102
Table 4.17-1 Project Trip Generation.....	108
Table 4.17-2 Screening for Land Use Projects Exempt from VMT Analysis	109
Table 4.17-3 Project VMT Per Employee.....	111
Table 4.17-4 Adjusted Project VMT Per Employee	113

List of Exhibits

Exhibit 2-1 Regional Context Map.....	11
Exhibit 2-2 Project Vicinity Map	13
Exhibit 2-3 Conceptual Site Plan.....	15
Exhibit 2-4 Project Elevations	17
Exhibit 4.3-1 Construction DMP Concentrations (ug/m ³).....	39
Exhibit 4.3-2 Operational DMP Concentrations (ug/m ³)	40
Exhibit 4.3-3 Cumulative Warehouse MEIR Locations	42
Exhibit 4.4-1 USFWS Critical Habitat Map	46
Exhibit 4.13-1 Noise Monitoring Locations	89
Exhibit 4.13-2 Operational Noise Receptor Locations	92

List of Appendices

Appendix A	Air Quality/HRA/GHG/Energy
Appendix B	Biological Resources
Appendix C	Cultural Resources/NA Consultation
Appendix D	Geotech/Soils Constraints
Appendix E	Hazards Reports
Appendix F	Water Quality Management Plan
Appendix G	Noise Impact Analysis Report
Appendix H	Traffic-Related Studies

1 Introduction

The City of Highland (City or Lead Agency) has received an application from Crow Holdings Industrial (applicant) for the construction of a 243,323-square foot industrial warehouse building, including 7,000 square feet of office space, on approximately 11.33 gross acres in the City of Highland, California (proposed Project or Project). The application includes a Major Conditional Use Permit, Major Design Review, Major Variance, and Tentative Parcel Map. The approval of these requested entitlements constitutes a *project* that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code §§ 21000, *et seq.*) according to the State CEQA Statute and CEQA Guidelines (14 California Code of Regulations §§ 15000, *et. seq.*).

To comply with CEQA, this Initial Study (IS) has been prepared in support of a Mitigated Negative Declaration (MND) to assess the short-term, long-term, and cumulative environmental impacts resulting from the proposed Project. This report was prepared to comply with CEQA Guidelines § 15063, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.10);
- Identification of environmental effects by the use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Section 4.11); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

CEQA § 21000 of the California Public Resources Code provides as follows:

The Legislature finds and declares as follows:

- a) *The maintenance of a quality environment for the people of this state now and in the future, is a matter of statewide concern.*
- b) *It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.*
- c) *There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.*
- d) *The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.*
- e) *Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.*

- f) *The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.*
- g) *It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage while providing a decent home and satisfying living environment for every Californian.*

The Legislature further finds and declares that it is the policy of the state to:

- a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- c) Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- g) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs, and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in CEQA § 21002, quoted below:

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study/Mitigated Negative Declaration (IS/MND). Such comments should explain any perceived deficiencies in the assessment of impacts in the IS/MND. Materials related to the preparation of this IS/MND are available for public review in person or on the City's website at:

<https://www.cityofhighland.org/203/Applications-Documents>

To request an appointment to review these materials, please contact:

Angela Tafolla, Associate Planner
City of Highland
Planning Department
27215 Base Line
Highland, California 92346
909-864-6861, ext. 258
atafolla@cityofhighland.org

All written comments received during the 30-day public review period for this Initial Study/Mitigated Negative Declaration will be considered by the City of Highland prior to adoption.

2 Project Description

2.1 – Project Title

Highland East Industrial Warehouse Building Project

2.2 – Lead Agency Name and Address

City of Highland
Planning Department
27215 Base Line
Highland, California 92346
909-864-6861, ext. 258

2.3 – Contact Person and Phone Number

Angela Tafolla, Associate Planner
(909) 864-6861 x258
atafolla@cityofhighland.org

2.4 – Project Location

The Project site is located between 3rd Street and W. 5th Street approximately midway between Central Avenue and Palm Avenue in the City of Highland, California. The surrounding uses include industrial uses north of the Project site, a business park to the east and west, and the San Bernardino International Airport to the south. See **Exhibit 2-1, Regional Context Location**, and **Exhibit 2-2, Project Vicinity Location**.

- Latitude 34° 06' 26" North, Longitude 117° 12' 47" West
- (APNs #1192-631-09, -10, -11, -12, -13, -14, -22, -23, -24, -25, -26, -27, and -28; and 1192-641-08, -09, -10, -11, 15, -16, -17, -18, -19, -20, and -21.)

2.5 – Project Sponsor's Name and Address

Jorge Garcia, Development Associate
Crow Holdings Industrial (CHI)
527 W. 7th Street, Suite 200
Los Angeles, CA 90014

2.6 – General Plan Land Use Designation

Business Park

2.7 – Zoning District

Business Park (BP)

2.8 – Project Description

The Project includes development of a single industrial warehouse building, mezzanine, and associated parking and landscaping on 11.33 gross acres (11.09 net acres) approximately 600 feet east of Central Avenue between 3rd Street and West 5th Street in the City of Highland, California. (APNs #1192-631-09, -10, -11, -12, -13, -14, -22, -23, -24, -25, -26, -27, and -28; and 1192-641-08, -09, -10, -11, 15, -16, -17, -18, -19, -20, and -21). (see **Exhibit 3, Conceptual Site Plan**). The proposed building will have 243,323 square feet of warehousing with 34 loading docks on the north side of the building facing 5th Street. The building also includes 7,000 square feet of office space to support the warehousing use.

Architecture

The proposed building will consist of concrete tilt-up construction with painted and scored accents. The design will provide glazing and colors to provide relief along the length of the building. The elevations will utilize a combination of materials and colors. The main color of the building will be Silver Feather (white) with accents of Cool Slate, Antique Silver, and Phantom Mist with reflective glazing on the wall panels. The building corners and office areas will include Blue reflective glazing, Black anodized mullions, and high gloss Web Gray and Black metal canopies to provide an attractive facility. See **Exhibit 2-4, Project Elevations**.

Landscaping

Landscaping is primarily along the Project's frontage on Third Street and Fifth Street, adjacent to the building and throughout parking areas. The Project meets the City's minimum landscape coverage requirement of 15% of the site, or 36,513 square feet of landscaping.

Walls and Fencing

The proposed Project includes 8-9-foot high screenwalls that will match the paint and color variations of the warehouse building. The truck courts will have 8-foot metal swinging gates.

Circulation – Access and On-Site

Access to the site will be from the I-210 freeways exiting at 5th Street and traveling west on 5th Street directly or from 5th Street then south on Palm Avenue and west on 3rd Street. Truck and auto access is separate as outlined below.

Automobiles

- Two 30-foot driveways are on the south side of the site on 3rd Street

Trucks

- Two 40-foot driveways are on the north side of the site on 5th Street

Emergency vehicle access is provided on the north, east, and west sides of the building with a 24-foot fire lane while the south side of the building is adjacent to 5th Street.

Drainage

The proposed Project will include an on-site stormwater infiltration system. On-site runoff will be collected through multiple drainage areas and infiltration systems and conveyed to the City's storm drainage system on 5th Street and 3rd Street. Two drainage areas on the west and easterly sides of the

Project Description

building along 3rd Street direct surface flows to inlets, where runoff is collected in an underground stormwater drainage pipeline, and moved to three (3) underground infiltration systems located in the northeast, northwest, and southwest portions of the site. Runoff exceeding the capacity of these infiltration systems will be directed to a new connection to the 3rd Street storm drain. In addition, hydrodynamic separators are proposed as pre-treatment Best Management Practices (BMPs), located upstream of the underground infiltration systems. There are an additional three “self-treating” drainage areas on 5th Street and 3rd Street that outlet excess runoff onto the gutters of their respective street. Structural and non-structural BMPs will be utilized in the landscaped areas on the Project site.

Building Operations

The warehouse will have 34 dock doors on the north side of the building (facing 5th Street) and is designed for storage and transportation uses, although specific end-users have not yet been identified. Since there is no specific end-user yet, details about the future operation of the facilities are not currently available but the Project has been analyzed in this IS.MND for a 24-hours per day, 7 days per week operational schedule to provide maximum flexibility for future users.

Construction Schedule

Construction of the proposed Project is estimated to last approximately 8 months. The table below summarizes the proposed Project’s construction phasing and the typical pieces of heavy-duty, off-road construction equipment that would be required during each phase. See Table 2-1, *Construction Scheduling*.

**Table 2-1
Construction Scheduling**

Construction Activity	Duration (Days)¹	Typical Equipment Used²
Site Preparation	20	Dozer, Tractor/Loader/Backhoe
Grading	20	Excavator, Grader, Dozer, Backhoe
Trenching	60	Trencher, Backhoe, Forklift
Building Construction	140	Crane, Forklift, Generator, Backhoe, Welder
Paving	10	Paver, Roller, Paving Equipment
Architectural Coating	25	Air Compressor
Total	275	Approx. 8 months
Source: MIG, Inc. 2023		
¹ Days refers to total active workdays in the construction phase, not calendar days.		
² The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each workday.		

Conditions of Approval

The proposed Project included a number of design features that reduce potential air pollutant emissions which were reflected in the emissions estimates and impact analyses contained in the Air Quality Report (i.e., they are not mitigation measures). These features, which are based on the example best practices identified in the California Attorney General Office’s “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” document, will be incorporated as conditions of approval for the Project and are summarized in Table 2-2, *Project Air Quality Conditions of Approval*.

**Table 2-2
Project Air Quality Conditions of Approval**

Project Design Feature	Recommended Conditions of Approval for Air Quality Impacts	How Does the Feature Reduce Emissions and/or Air Quality Impacts?
Use of Zero Emission On-site Operations Equipment (forklifts, pallet jacks, etc.)	The applicant will require the use of electric forklifts, pallet jacks, and other cargo/material handling equipment as a lease condition/condition of sale.	The use of electric forklifts and other equipment avoids on-site emissions from diesel-, compressed natural gas- and other fossil-fuel-powered types of this equipment.
Cool/Reflective Roof Materials	The applicant has designed the proposed Project to include the use of light-colored roofing materials with a solar reflective index (SRI) of no less than 78.	The use of light-colored roofing materials reduces heat gain and energy usage associated with building heating and cooling systems.
Solar-ready Building Roof	The applicant has designed the proposed building's roof to facilitate and optimize the future installation of a solar photovoltaic (PV) system.	The installation of solar photovoltaic (PV) systems will reduce facility energy demand and indirect emissions associated with energy production.
Cool Pavements	The applicant has designed the Project's parking areas and drive aisles to be constructed with a solar-reflective cool pavement (concrete).	The use of solar-reflective cool pavements reduces heat island effects that can lead to increased demand for energy in building heating and cooling systems.
Electrical Rooms	The applicant has designed the proposed building's electrical maintenance rooms to be 25% larger than required for the current building design.	The installation of a larger electrical room supports the future installation and expansion of emissions reduction infrastructure such as solar PV systems, alternative space and water heating systems, electric vehicle/truck charging equipment, etc.
Super-compliant Architectural Coatings	The applicant will use super-compliant architectural coatings during Project construction as defined by the SCAQMD.	The South Coast Air Quality Management District (SCAQMD) defines super-compliant coatings as paints that meet a VOC standard of <10 g/L. These will help reduce volatile organic compounds (VOC) emissions during application of architectural coatings as documented in the Project's <i>Air Quality Study</i> .

Project Design Feature	Recommended Conditions of Approval for Air Quality Impacts	How Does the Feature Reduce Emissions and/or Air Quality Impacts?
Off-road Equipment Selection	The applicant shall require a construction bid, contract, procurements, and other similar documents including a requirement for the contractor to use the highest-rated California Air Resources Board (CARB) engine tier technology available at the time of construction unless proof is provided that such equipment is not available and cannot be reasonably obtained from other sources within the jurisdiction of the SCAQMD.	The use of late-model off-road equipment meeting CARB and U.S. EPA Tier 3 and Tier 4 emissions standards (either through the original equipment manufacturer or the use of retrofit devices that reduce specific pollutant emissions) reduces construction emissions and potential pollutant concentrations at sensitive receptor locations.
Electric-powered hand tools, forklifts, and pressure washers	The applicant shall require a construction bid, contract, procurements, and other similar documents including a requirement for the contractor to electric-powered hand tools, forklift, and pressure washers during Project construction. The applicant shall also require the construction contractor to designate an area where electric-powered construction vehicles and equipment can charge.	The use of electric-powered hand tools, forklifts, and pressure washers on-site emissions from diesel-, compressed natural gas- and other fossil-fuel-powered types of this equipment.
Electric Service During Construction	The applicant shall require construction bid, contract, procurements, and other similar documents including a requirement for the contractor to provide temporary electrical utility service to the construction site and limit the use of diesel-powered generators.	Connecting to electric service during construction and limiting the use of diesel-powered generators minimizes on-site emissions during construction.

2.9 – Surrounding Land Uses

The Project site is bounded by vacant land, residences, and warehousing to the north and to the east by equipment storage and automotive repair and storage facilities. In addition, the site is bounded to the west by businesses that are concurrently being developed with this Project, and to the south by the San Bernardino International Airport which is in the City of San Bernardino. Surrounding uses are summarized in Table 2-3, *Surrounding Land Uses*. There are single-family residences (non-conforming uses) located in the industrial-zoned land across West 5th Street and multi-family residences in the planned development northwest of the Project site across the intersection of West 5th Street and Central Avenue.

**Table 2-3
Surrounding Land Uses**

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	BP – Business Park	Business Park (BP)	Currently vacant, formerly light industrial and residential uses
North	I – Industrial	Industrial (I)	Vacant, warehouses, and /Residential
South*	Airport*	Airport*	Airport*
East	BP – Business Park	Business Park (BP)	Commercial and Residential
West	BP – Business Park	Business Park (BP)	Light Industrial

* San Bernardino International Airport (SBIA) in the City of San Bernardino

2.10 – Environmental Setting

The Project is located on a roughly rectangular-shaped property approximately 11.33 gross acres in size in a developed area of the City of Highland, California. There are numerous parcels on the property that until recently were developed for various uses including several residences and construction yards with various storage including vehicles, pipes, and construction equipment. Buildings on the property were mainly single-story structures made from either wood frames and stucco construction or steel frames and metal panel construction. However, existing uses on the site were demolished and removed in December 2022 in anticipation of entitlement processing. Most of the site now contains exposed soil with some grass and weed growth. Until recently there were medium to large-sized trees in the central and eastern portions of the site mainly associated with three residences on the property. These improvements and much of the landscaping were removed in December 2022. The Project site is relatively flat with an elevation range of 1,172 to 1,186 feet above mean sea level (AMSL). The overall site slopes downward to the north at a gradient of less than 2%. The Project site is roughly 1.2 miles west of State Route 210, 5.3 miles east of Interstate 215, and 4.2 miles north of Interstate 10. Per the Zoning Map, the Project site is within San Bernardino International Airport Overlay Zone E which carries negligible airport-related safety risks.

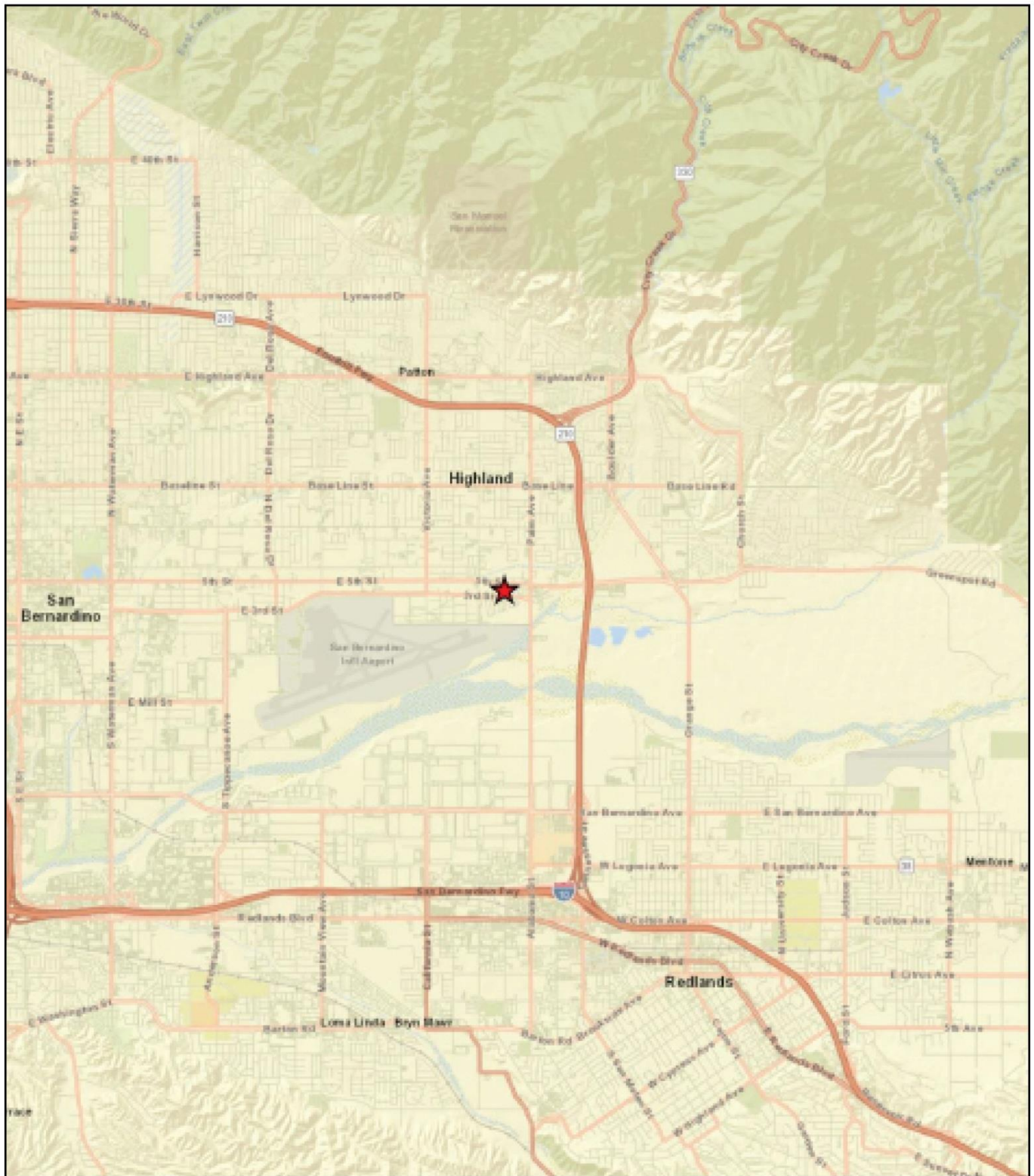
2.11 – Required Approvals

The City of Highland is the only land use authority for this Project requiring the following approvals:

- Major Conditional Use Permit – to permit a warehouse in the Business Park zone
- Major Design Review – required as part of the Conditional Use Permit process
- Major Variance – to permit the building height to be 48' at the center portion of the roof (high point)
- Tentative Parcel Map - to consolidate twenty-four (24) parcels into one (1) parcel

2.12 – Other Public Agency Whose Approval is Required

- San Bernardino International Airport Authority
- Federal Aviation Administration



Legend

★ Highland East (Project Site)

0 4,500 9,000 18,000 Feet



Exhibit 2-1 Regional Context Map

CHIPT Highland East Warehouse Building and Office Space
Highland, California



This Page Intentionally Left Blank



Exhibit 2-2 Project Vicinity Map

CHIPT Highland East Warehouse Building and Office Space
Highland, California

This Page Intentionally Left Blank

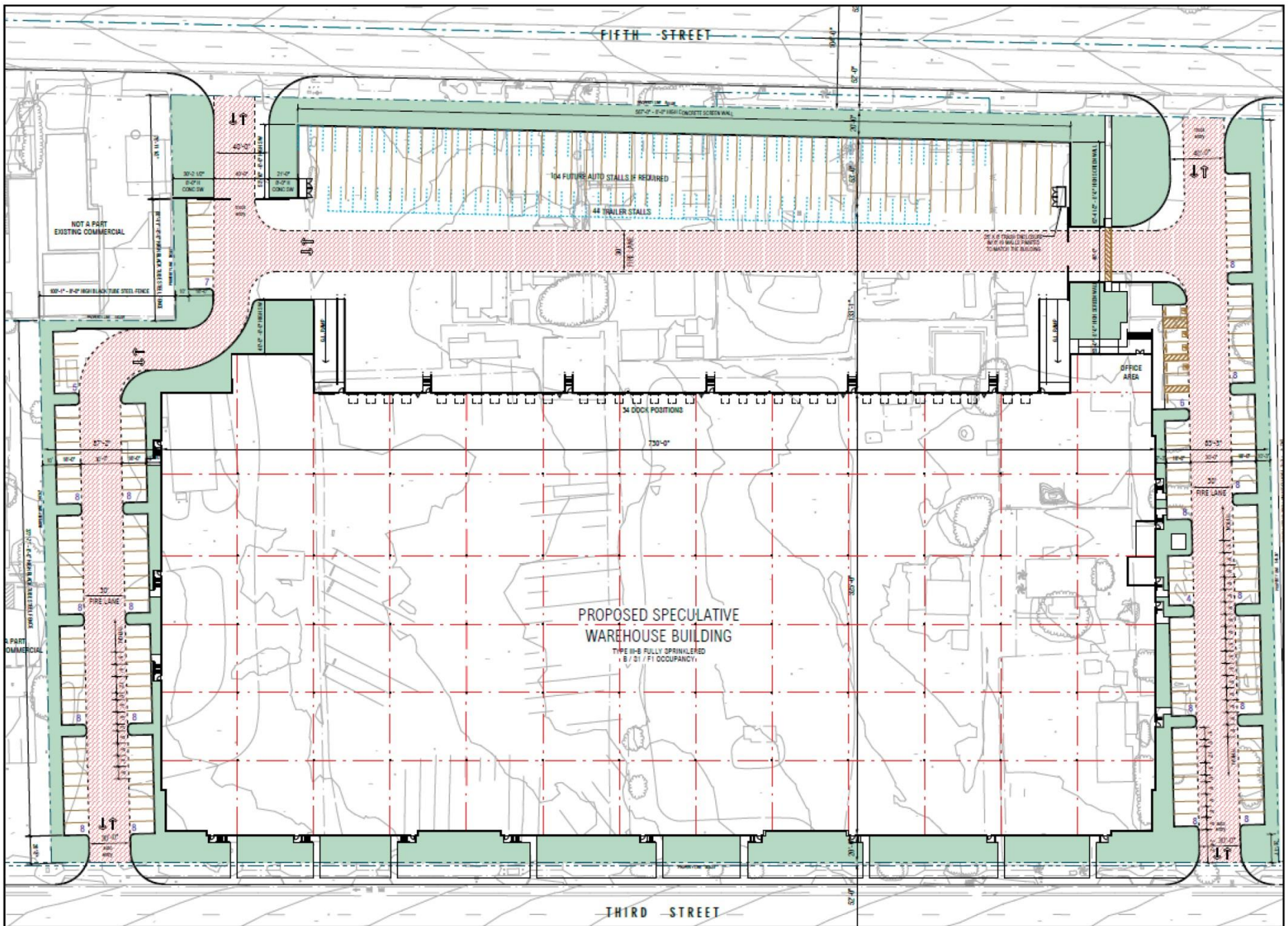


Exhibit 2-3 Conceptual Site Plan

CHIPT Highland East Warehouse Building and Office Space
Highland, California

This Page Intentionally Left Blank



SOUTH ELEVATION

SCALE: 1" = 30'-0"



EAST ELEVATION

SCALE: 1" = 30'-0"

FINISH SCHEDULE:

	1. FIELD COLOR PPG - PPG1002-1 - SILVER FEATHER
	2. LIGHT ACCENT COLOR PPG - PPG1002-3 - COOL SLATE
	3. DARK ACCENT COLOR PPG - PPG1002-5 - ANTIQUE SILVER
	4. DARK ACCENT COLOR PPG - PPG1002-7 - PHANTOM MIST
	5. GLASS - PRIMARY WINDOW PPG SOLARCOOL PACIFICA



WEST ELEVATION

SCALE: 1" = 30'-0"

NOTES:

1. ALL ROOFTOP MECH. EQUIPMENT SHALL BE SCREENED FROM VIEW.
2. PROVIDE GRAFFITI RESISTANT COATING TO A HEIGHT OF 12 FEET ON THE WEST ELEVATION.

KEYNOTES: (X)

1. PAINTED CONCRETE TILT-UP PANELS W/ ACCENT REVEALS AS SHOWN.
2. REFLECTIVE BLUE GLASS IN CLEAR ANODIZED ALUMINUM MULLION SYSTEM.
3. NOT USED.
4. RECESSED ENTRY WITH PRIMARY GLASS ENTRANCE DOORS.
5. PAINTED 9'-0" X 10' DOCK HIGH VERTICAL LIFT METAL TRUCK DOOR ASSEMBLY WITH DOCK BUMPERS. SEE DOOR SCHEDULE.
6. PAINTED 12' X 10' GRADE LEVEL VERTICAL LIFT METAL TRUCK DOOR ASSEMBLY. SEE DOOR SCHEDULE.
7. CONCRETE TILT-UP SCREEN WALL PAINT AND REVEALS AS SHOWN TO MATCH BUILDING.



NORTH ELEVATION

SCALE: 1" = 30'-0"

Exhibit 2-4 Elevations

CHIPT Highland East Warehouse Building and Office Space
Highland, California



This Page Intentionally Left Blank

3 Determination

3.1 – 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 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/Traffic	☐	Tribal Cultural Resources
☐	Utilities / Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

3.2 – Determination

☐	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 measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (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.

Name: Angela Tafolla, Associate Planner

Date: October 4, 2023

This Page Intentionally Left Blank

4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 buildings within view from 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 view 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?	☐	☐	☒	☐

a) **Less than Significant Impact.** Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). Scenic vistas can generally be defined as natural landscapes that form views of unique flora, geologic, or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces, and waterbodies. Scenic vistas generally play a large role in the way a community defines itself and also effects development patterns as projects are designed to take advantage of viewsheds.

The City of Highland sits at the southern foot of the San Bernardino Mountains, offering a visual backdrop visible from all areas of the city. New developments have the potential to block views of the mountains if building heights are too high. View preservation is vital to maintaining Highland's character, and as such is incorporated into the City's General Plan. Goal 5.1 of the Conservation and Open Space Element sets policies in place to maintain and create vistas throughout the city to enhance the visual experience of Highland. The Project site is located in a developed area of Highland zoned as Business

Park (BP) which has a height limit of 35 feet. Until recently the Project site contained a number of industrial and residential structures which were demolished in December 2022 and the site is currently vacant. The proposed warehouse will have a finished height of 48 feet which exceeds the established zone height limit. However the City approved a City-wide Variance Process that allows a maximum height of 50 feet for warehouses.¹ In addition, the Project has received confirmation that its requested height will not interfere with any Federal Aviation Authority (FAA) or San Bernardino International Airport Authority (SBIAA) restrictions.

There are public views of the San Bernardino Mountains to the north and east from the two local roadways (3rd Street to the south and 5th Street to the north of the site). The new warehouse building may block views of the mountains for travelers along 3rd Street (looking north) which would only occur for several seconds for vehicles traveling along the roadway. With the proposed height of the warehouse and its location in an already developed area, impacts to the scenic vistas in this portion of Highland would be less than significant and no mitigation is required.

b) **No Impact.** There are no historic highways on the Project site, and the site is not visible to a designated state scenic highway as identified on the California Scenic Highway Mapping System.² The nearest officially designated scenic highways are California State Route 74 in Banning and California State Route 38 near Big Bear Lake. State Route 330 in Highland has not been officially designated but is eligible for designation. The Project site is not visible from these routes. While scenic vistas form a complete viewshed, scenic resources are isolated occurrences of aesthetically pleasing forms. Typical examples of natural scenic resources include rock outcroppings, trees, and prominent ridgelines. Scenic resources can also be man-made, such as architecturally distinctive or historic buildings, but there are none of these resources on the site or in the surrounding area that are visible from the Project site. Therefore, the Project is not expected to significantly impact scenic resources. No impacts will occur and no mitigation is required.

c) **Less than Significant Impact.** The areas immediately around the Project site are zoned for business and industrial uses; a warehouse is being proposed concurrently with this site directly west, and the San Bernardino International Airport sits across 3rd Street to the south of the Project site as well. The proposed warehouse building has been designed according to City design guidelines, including requirements for architectural quality, landscaping, and screening, and will be consistent in character and quality with surrounding developments. The Project is also requesting a variance for height which was approved City-wide for warehouses to exceed their zone height limits to a maximum height of 50 feet. Views of the mountains in this area are to the north and east, and residences in the area, though they are non-conforming, are located to the east and north, so there are no residential uses in the area whose views would be blocked by the Project. The new warehouse building may block views of the mountains for travelers along 3rd Street (looking north) which would only occur for several seconds for vehicles traveling along the roadway.

The Project site while under construction will undergo visual changes consistent with an ongoing construction project, but these will only temporarily change the visual character of the site and surrounding area. However, the Project will not substantially degrade the existing visual character and qualities of the site and its surroundings, so it will have a less than significant impact, and no mitigation is required. It should also be noted that the proposed Project will result in positive aesthetic changes to the site by the recent removal of dilapidated buildings, the addition of landscaping, and overall rehabilitation of a formerly visually degraded site.

d) **Less than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused by

unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from a simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Sources of daytime glare are typically concentrated in commercial areas and are often associated with retail uses. Glare results from development and associated parking areas that contain reflective materials such as high-efficiency window glass, highly polished surfaces, and expanses of pavement. It is also possible that light and glare from the Project could affect activities at the San Bernardino International Airport to the southwest. Development of parking improvements, related lighting, and associated glare will be controlled in accordance with design standards in the City of Highland Municipal Code; Chapter 16.52.060 Parking Regulations and Chapter 16.40, General Development Standards³ which do not allow the use of highly reflective glass and other surfaces. As a result, glare is not expected to result from the increase in white pavement or glass from the warehouse building. Adhering to Highland Municipal Code Standards will ensure any impacts related to excessive or inappropriately directed lighting. In addition, the Federal Aviation Administration (FAA) and San Bernardino County Airport Land Use Commission (ALUC) reviewed the Project relative to the Airport Land Use Plan for the San Bernardino International Airport (SBIA) and determined lighting and glare from the Project would not have significant effects on airport and aircraft operations. Therefore, potential lighting and glare impacts of the Project will be less than significant and no mitigation is required.

4.2 – Agriculture and Forest Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson 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 loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) **No Impact.** The California Important Farmland Finder prepared by the California Department of Conservation does not identify the Project site as being located on prime farmland, unique farmland, or farmland of Statewide Importance.⁴ The City of Highland General Plan does identify portions of the eastern city for Agricultural/Equestrian uses, allowing for light agricultural activities and permits the keeping of large animals. The Project site is located away from any land zoned AE, and there will be no conversion of farmlands to non-agricultural uses, and as a result, will have no impact.

b) **No Impact.** The Project site is not located on land that is used or conflicting with agriculturally zoned land. The Project site is currently zoned Business Park (BP) which does not allow for agricultural uses.⁵ The Project site is not located on a Williamson Act parcel in the County of San Bernardino.⁶ There will be no conflict with existing zoning for agricultural use or a Williamson Act contract, therefore there will be no impact.

c) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.* The Project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The Project site is zoned as Business Park for commercial uses that include warehousing, office space, and light industrial uses, and as such, development of the Project will have no impact to any timberland or forestland zoning.

d) **No Impact.** As indicated in 4.2 c), the area is not designated as forest land; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of the Project.

e) **No Impact.** Until recently, the Project site contained multiple properties with industrial uses including equipment and truck storage, mixed with residential uses within an urbanized environment. In December 2022 these uses were demolished and the site is currently vacant. A warehouse is being proposed concurrently directly west of the proposed Project site. Zoning to the east, west, and north of the site is for Business Park and Industrial uses respectively, and the San Bernardino International Airport is across 3rd Street to the south. None of the surrounding sites contain existing forest uses or large numbers of trees. The development of this proposed Project would not change the existing environment in a manner that would result in the conversion of forest land to non-forest use. No impact would occur.

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

An Air Quality and Health Risk Assessment Report⁷ was prepared for the proposed Project by MIG, Inc., dated June 2, 2023 (See Appendix A). The Report estimates the potential air quality emissions for the proposed Project and evaluates Project emissions against applicable South Coast Air Quality Management District (SCAQMD)-recommended California Environmental Quality Act (CEQA) significance thresholds for construction and operation.

a) **Less than Significant Impact.** A project that conflicts with or obstructs the implementation of the South Coast Air Quality Management District's (SCAQMD) South Coast Air Basin 2022 Air Quality Management Plan (AQMP) could hinder the implementation of the AQMP, delay efforts to meet attainment deadlines, and/or interfere with SCAQMD efforts to maintain compliance with, and attainment of, applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the SCAQMD *CEQA Air Quality Handbook*, consistency with the AQMP is affirmed if the project (SCAQMD, 1993):

- 1) Is consistent with the growth assumptions in the AQMP; and
- 2) Does not increase the frequency or severity of an air quality standards violation or cause a new one.

Consistency Criterion 1 refers to the growth forecasts and associated assumptions included in the AQMP. Projects that are consistent with the AQMP growth assumptions would not interfere with attainment of air quality standards, because this growth is included in the projections used to formulate the AQMP. The Southern California Association of Governments (SCAG) 2020 Regional Transportation

Plan/Sustainable Communities Strategy (RTP/SCS), now called “Connect SoCal”, which formulates the growth projections on which the 2022 AQMP are based, estimated that the City of Highland would increase employment by approximately 4,200 jobs between 2016 and 2045, a growth rate of approximately 145 new jobs per year during that time period (SCAG, 2020). The proposed Project is estimated to create approximately 208 new jobs, which would be well within the SCAG 2020 RTP/SCS growth projections for the City of Highland (Urban Crossroads 2023). The proposed Project is consistent with the General Plan and Zoning designations, which form the basis for growth assumption accounted for in the SCAG 2020 RTP/SCS (SCAG, 2020). Therefore, the proposed Project would not exceed the growth assumptions contained in the AQMP.

Consistency Criterion 2 refers to the California Ambient Air Quality Standards (CAAQS). In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described below in Section 3(b), the proposed Project would not generate construction or operational emissions in excess of SCAQMD criteria air pollutant thresholds.

For the reasons described above, the proposed Project would not conflict with the SCAQMD 2022 AQMP.

b) **Less than Significant Impact.** A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds or if project-related emissions would substantially contribute to existing or projected air quality violations. The proposed Project is located within the South Coast Air Basin (Basin), where efforts to attain state and federal air quality standards are governed by the SCAQMD. Air pollution levels are measured at monitoring stations located throughout the Basin. The Project site is located in SCAQMD Source Receptor Area (SRA) 34 – Central San Bernardino Valley. The station closest to the Project site is identified as Central San Bernardino Valley 2 by the SCAQMD. The station is approximately 3.3 miles west of the Project site, near Anderson Elementary School, and monitors Carbon Monoxide (CO), Ozone (O₃), Nitrogen Dioxide (NO₂), Large Particulate Matter (PM₁₀), and Fine Particulate Matter (PM_{2.5}). This monitoring station represents the best approximation of the air quality conditions near the Project site. Table 4.3-1, *Local Air Quality*, summarizes the published monitoring data from the Central San Bernardino Valley 2 monitoring station from 2019 to 2021, the three most recent years for which verified, published data was available from the SCAQMD at the time this report was prepared. Table 4.3-2, *South Coast Air Basin Attainment Status*, shows that air quality standards at this location have been exceeded for PM₁₀, PM_{2.5}, and O₃. This is consistent with the entire Basin's classification as non-attainment for PM₁₀, PM_{2.5} and O₃.

**Table 4.3-1
Local Air Quality**

Pollutant	Ambient Air Standard	Year		
		2019	2020	2021
Ozone (O ₃)				
Maximum 1-hour Concentration (ppm)		0.127	0.162	0.142
Maximum 8-hr Concentration (ppm)		0.114	0.128	0.112
Number of Days Exceeding State 1-hr Standard	>180 µg/m3	63	89	66
Number of Days Exceeding State 8-hr Standard	>137 µg/m3	96	128	101
Days Exceeding Federal 1-hr Standard	>0.124 ppm	2	15	6
Days Exceeding Federal 8-hr Standard	>0.070 ppm	96	128	98
Carbon Monoxide (CO)				
Maximum 1-hr Concentration (ppm)		1.3	1.9	2.0
Maximum 8-hr Concentration (ppm)		1.1	1.4	1.6
Days Exceeding State 1-hr Standard	>23,000 µg/m ³	0	0	0
Days Exceeding Federal/State 8-hr Standard	>10,000 µg/m ³	0	0	0
Days Exceeding Federal 1-hr Standard	>40,000 µg/m ³	0	0	0
Nitrogen Dioxide (NO ₂)				
Maximum 1-hr Concentration (ppb)		59.3	54.0	56.3
Annual Arithmetic Mean Concentration (ppb)		14.3	14.9	15.1
Days Exceeding State 1-hr Standard	>180 µg/m ³	0	0	0
Suspended Particulate Matter (PM ₁₀)				
Maximum 24-hr Concentration (µg/m ³)		112	80	111
Annual Arithmetic Mean (µg/m ³)		29.9	38.7	39.3
Samples Exceeding State 24-hr Standard	>50 µg/m ³	36	81	79
Samples Exceeding Federal 24-hr Standard	>150 µg/m ³	0	0	0
Fine Particulate Matter (PM _{2.5})				
Maximum 24-hr Concentration (µg/m ³)		34.8	25.7	57.9
Annual Arithmetic Mean (µg/m ³)		10.1	11.7	11.9
Samples Exceeding Federal 24-hr Standard	>35 µg/m ³	0	0	1
Sources: Table 3-2, MIG 2023 (Appendix A). Data from SCAQMD Air Quality Data for SRA Central San Bernardino Valley				

Both the State of California and the federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as criteria pollutants). These pollutants include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), inhalable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. Where the state and federal standards differ, California AAQS (CAAQS) are more stringent than the national AAQS (NAAQS). The U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and the SCAQMD assess the air quality of an area by measuring and monitoring the amount of pollutants in the ambient air and comparing pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into one of the following categories:

- **Attainment.** A region is “in attainment” if monitoring shows ambient concentrations of a specific pollutant are less than or equal to NAAQS or CAAQS. In addition, an area that has been re-designated from nonattainment to attainment is classified as a “maintenance area” for 10 years to ensure that the air quality improvements are sustained.

- **Nonattainment.** If the NAAQS or CAAQS are exceeded for a pollutant, the region is designated as nonattainment for that pollutant. It is important to note that some NAAQS and CAAQS require multiple exceedances of the standard in order for a region to be classified as nonattainment. Federal and state laws require nonattainment areas to develop strategies, plans, and control measures to reduce pollutant concentrations to levels that meet or attain standards.
- **Unclassified.** An area is unclassified if the ambient air monitoring data are incomplete and do not support a designation of attainment or nonattainment.

Air pollution levels are measured at monitoring stations located throughout the Basin. Table 4.3-2, *South Coast Air Basin Attainment Status*, summarizes the Basin's attainment status for the NAAQS and CAAQS.

**Table 4.3-2
South Coast Air Basin Attainment Status**

Pollutant	Attainment Status ¹	
	NAAQS	CAAQS
O ₃ (1-hr)	Nonattainment	Nonattainment
O ₃ (8-hr)	Nonattainment	Nonattainment
PM ₁₀ (24-hr and Annual)	Attainment	Nonattainment
PM _{2.5} (24-hr)	Nonattainment	--
PM _{2.5} (Annual)	Nonattainment	Nonattainment
CO	Attainment (Maintenance)	Attainment
NO ₂ (1-hr)	Attainment	Attainment
NO ₂ (Annual)	Attainment (Maintenance)	Attainment
SO ₂	Attainment	Attainment
Lead	Partial Nonattainment	Attainment
Visibility Reducing Particles	--	Unclassified
SO ₄	--	Attainment
H ₂ S	--	Attainment

Source: SCAQMD, 2018

¹ This table summarizes the Basin's attainments status for the NAAQS and CAAQS (as of September 2018). This table does not provide comprehensive information regarding the CAAQS and NAAQS. Each CAAQS and NAAQS has its own averaging time, standard unit of measurement, measurement method, and statistical test for determining if a specific standard has been exceeded. Refer to the table source for detailed information on the NAAQS and CAAQS.

The proposed Project would generate both short-term construction emissions and long-term operational emissions. The SCAQMD adopts rules that establish permissible air pollutant emissions levels for a variety of businesses, processes, operations, and products that are subject to Federal and State air quality requirements. In general, the proposed Project and its potential emissions sources would be subject to the following State and SCAQMD rules:

- **SCAQMD Rule 401 (Visible Emissions)** prohibits discharge into the atmosphere from any single source of emission for any contaminant for a period or periods aggregating more than three minutes in any one hour that is as dark or darker in the shade than that designated as No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.
- **SCAQMD Rule 402 (Nuisance)** prohibits discharges of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the

public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **SCAQMD Rule 403 (Fugitive Dust)** prohibits emissions of fugitive dust from any grading activity, storage pile, or other disturbed surface area if it crosses the project property line or if emissions caused by vehicle movement cause substantial impairment of visibility (defined as exceeding 20 percent capacity in the air). Rule 403 requires the implementation of Best Available Control Measures and includes additional provisions for projects disturbing more than five acres and those disturbing more than fifty acres.
- **SCAQMD Rule 461 (Gasoline Transfer and Dispensing)** applies to the transfer of gasoline from any tank truck, trailer, or railroad tank car into any stationary storage tank or mobile fueler and from any stationary storage tank or mobile fueler into any mobile fueler or vehicle fuel tank. The rule prohibits transfer and dispensing of gasoline in equipment that does not meet CARB Phase I and Phase II vapor recovery requirements that provide between 95% and 98% control of gasoline vapors.
- **SCAQMD Rule 1108 (Cutback Asphalt)** prohibits the sale or use of any cutback asphalt containing more than 0.5 percent by volume organic compounds which evaporate at 260°C (500°F) or lower.
- **Rule 1113 (Architectural Coatings)** establishes maximum concentrations of VOCs in paints and other applications and establishes the thresholds for low-VOC coatings.
- **Rule 1143 (Consumer Paint Thinners and Multi-Purpose Solvents)** prohibits the supply, sale, manufacture, blend, package, or repackaging of any consumer paint thinner or multi-purpose solvent for use in the District unless consumer paint thinners or other multipurpose solvents comply with applicable VOC content limits.
- **Rule 2305 (Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program)** was adopted by the SCAQMD Governing Board on May 7, 2021, and sets forth requirements that regulated warehouse owners and operators must follow. Rule 2305 specifies that warehouse operators (for warehouses with an indoor floor space of 100,000 square feet or more and operate at least 50,000 square feet of that space for warehousing activities) must achieve a specified number of WAIRE Points (also referred to as the WAIRE Point Compliance Obligation, or WPCO) every year using either a menu of options, developing and implementing a custom plan, or paying a mitigation fee. Regardless of size, warehouse operators are required to submit a Warehouse Operations Notification (WON): 1) within 14 days of a new warehouse operator having access to at least 50,000 square feet of space for warehousing purposes, 2) within 30 days after a renovation that alters the size of the warehouse, or 3) within three days of a request from the SCAQMD. An Initial Site Information Report (ISIR) must also be submitted by an authorized official of the warehouse operator through the WAIRE Program Online Portal. No additional reporting is required in the ISIR if 1) the total square footage that may be used for warehousing activities in that facility is less than 100,000 square feet, or 2) the warehouse operator's lease does not allow them to use more than 50,000 square feet for warehousing activities.

In addition to SCAQMD Rules, the Conservation and Open Space Element of the City of Highland's General Plan contains the following goals and policies related to air quality (City of Highland 2006b):

Goal 5.17: Encourage site design practices that reduce and conserve energy use

- Policy 1. Encourage energy and environmentally sustainable designs— such as “Green Development Standards”—in the design and approval of new projects.

- Policy 2. Orient buildings on the site to maximize the natural ventilation provided by prevailing breezes.
- Policy 3. Incorporate passive solar design techniques including building orientation, energy-saving materials, roof overhangs, and window and door placement.
- Policy 4. Increase minimum building insulation standards.
- Policy 5. Encourage landscape design that cools buildings and blocks solar rays, such as the planting of deciduous trees on south and west-facing elevations, and give Title 24 credit for landscaping.
- Policy 7. Encourage energy-efficient retrofitting of existing buildings, where practical, throughout the City including assisting applicants in the installation of more efficient HVAC (heating, ventilation, air conditioning) systems.
- Policy 8. Distribute and participate in incentive programs for incorporation of solar and photovoltaic panels (active solar) into existing or new buildings.

Goal 5.19: Continue to support air quality planning through land use policies, outreach efforts and coordination with regional air quality agencies.

- Policy 1. Reduce locally generated emissions through traffic flow improvements (including signal synchronization) and construction management practices.
- Policy 3. Encourage land use planning and urban design that reduces vehicle trips through mixed and multi-use development, consolidation of commercial development along major arterials, provision of pedestrian connections from residential to retail areas, and development of a multi-use Town Center.
- Policy 7. Encourage employers to develop trip reduction plans to promote alternative work schedules, ridesharing, telecommuting and work-at-home programs, employee education and preferential parking.
- Policy 9. Work with SANBAG to develop guidelines for the location and design of land uses that are sensitive to air pollution.
- Policy 10. Reduce particulate emissions from roads, parking lots, construction sites and agricultural lands to the maximum extent practical through dust suppression, street cleaning and other practices.
- Policy 11. Establish grading and building permitting procedures so that all construction involving demolition or earth movement reduces fugitive dust emissions through the appropriate techniques (e.g., wetting).
- Policy 12. Incorporate the provisions of SCAQMD Rule 403 (Fugitive Dust) into City land use administration rules and procedures.
- Policy 13. Continue comprehensive efforts to reduce energy consumption.

Goal 10.12: Encourage development that is energy efficient and environmentally sustainable.

- Policy 5. Encourage transit-oriented, infill development to make efficient use of existing land.
- Policy 6. Encourage site planning and building orientation that maximizes solar and wind resources for cooling and heating.
- Policy 7. Encourage the use of ecologically sound building materials such as those made of recycled content and contain low amounts of volatile organic compounds (VOCs).

- Policy 8. During construction, require developers and builders to protect topsoil in order to reduce dust and runoff impacts.

Finally, the City of Highland Municipal Code (CHMC) Title 16 (Land Use and Development), Chapter 16.48 (Performance Standards), sets the following limitations that may be applicable to air quality for the proposed Project:

- Section 16.48.030 (Air Quality): No operation or activity shall cause the emission of any smoke, fly ash, dust, fumes, vapors, gases or other forms of air pollution which can cause material damage to health or property, or which can cause excessive dirt on any other lot. No emission shall be permitted which exceeds the requirements of the South Coast Air Quality Management District or the requirements of any Air Quality Plan adopted by the city of Highland.
- 16.48.100 (Maintenance of Open Areas): All open areas shall be landscaped, or they shall be surfaced, treated and maintained permanently in a manner which will minimize dust.
- 16.48.110 (Mechanical and Electrical Equipment): All such equipment, including air conditioners, antennas, pumps, transformers, heating and ventilating equipment, shall be located and operated in a manner that does not materially disturb adjacent uses and activities.
- 16.48.130 (Odors): No operation or activity shall be permitted which emits odorous gases or other odorous matter in such quantities as to be dangerous, injurious, noxious, or otherwise objectionable to a level that is detectable without the aid of instruments at or beyond the lot line.
- 16.48.150 (Smoke): No operation or activity is permitted to have operations which emit excessive smoke, fumes, or dust or which exceed the requirements or levels as specified by the South Coast Air Quality Management District.

These SCAQMD rules, General Plan Goals and Policies, and Municipal Code Sections serve to limit and control the proposed project's potential to emit air pollutants. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed SCAQMD-recommended pollutant thresholds.

Regional Construction Emissions

Construction of the proposed Project could begin as early as the 3rd quarter of 2023 and take approximately 13 months to complete. The development of the approximately 11.09-acre Project site and the construction of the approximately 243,323 square feet industrial warehouse building would require site preparation, grading, trenching, building construction, paving, and architectural coating phases/activities. Grading/earthwork would be balanced on site. The proposed Project is anticipated to require varying types of equipment throughout the different construction phases including, but not limited to, bulldozers, backhoes, loaders, graders, cranes, and forklifts. Table 4.3-3, *Construction Activities*, summarizes the proposed Project's construction phasing and the typical pieces of heavy-duty, off-road construction equipment that would be required during each phase. It should be noted these emission estimates account for removal/demolition of existing uses on the site prior to submittal of the IS/MND to the City. Therefore, the Project does not receive any "discount" for removing existing uses (and their air pollutant emissions) by its development.

**Table 4.3-3
Construction Activities**

Construction Activity	Duration (Days) ¹	Typical Equipment Used ²
Site Preparation	20	Dozer, Tractor/Loader/Backhoe
Grading	20	Excavator, Grader, Dozer, Backhoe
Trenching	60	Trencher, Forklift, Backhoe
Building Construction	140	Crane, Forklift, Backhoe
Paving	10	Paver, Paving Equipment, Roller
Architectural Coating	25	Air Compressor
Source: Table 2-3, MIG 2023 (Appendix A). ¹ Days refers to total active workdays in the construction phase, not calendar days. ² The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each workday.		

The proposed Project's maximum daily unmitigated construction emissions are shown in Table 4.3-4, *Construction Emissions*. The construction emissions estimates incorporate measures to control and reduce fugitive dust as required by SCAQMD Rule 403 and the implementation of project design features as conditions of approval and identified in Section 2.8, that reduce construction-related air pollutants. As shown in Table 4.3-4, the proposed Project's maximum daily unmitigated construction emissions would be below the SCAQMD's regional pollutant thresholds for all criteria pollutants. Thus, the proposed Project would not generate construction-related emissions that exceed SCAQMD CEQA thresholds and no mitigation is required for construction emissions.

It should be noted that the City has a number of standard Conditions of Approval (COAs) that implement SCAQMD regulations related to air pollution emissions from construction of development projects. The City will require this project to implement those standard COAs which will help further reduce potential air pollutants from Project construction.

**Table 4.3-4
Construction Emissions**

Season	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer 2023	11.9	17.7	21.6	<0.1	6.6 ^(A)	3.6 ^(B)
Winter 2023	11.9	17.7	21.5	<0.1	6.6 ^(C)	3.6 ^(D)
Summer 2024	11.9	1.4	3.2	<0.1	0.5 ^(E)	0.2 ^(F)
Winter 2024	11.9	1.4	3.0	<0.1	0.5 ^(G)	0.2 ^(H)
SCAQMD CEQA Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Source: Table 4-15, MIG 2023 (Appendix A)						

Regional Operational Emissions

Once operational, the proposed Project would generate long-term emissions from the following sources:

- **“Area” Sources.** The proposed Project would generate emissions from small area sources, including landscaping equipment, the use of consumer products (e.g., paints, cleaners, and fertilizers) that result in the evaporation of chemicals into the atmosphere during product use.
- **Energy Use and Consumption.** The proposed Project would generate emissions from the combustion of natural gas in water and space heating equipment, as well as industrial processes.
- **Mobile Sources.** The proposed Project would generate emissions from vehicles traveling to and from the project site.

The proposed Project’s operational emissions were also estimated using the latest California Emissions Estimator Model (CalEEMod, Version 2020.4.0). The Project’s first full year of operation is anticipated to be 2025; however, as the Project could operate in a portion of Year 2024, the earlier year was selected as its operational year for the CalEEMod emissions modeling to provide a conservative assessment of the Project’s potential operational emissions. Similar to construction emissions, operational emissions do not allow any “discount” for removal/demolition of existing uses on the site since those uses were removed prior to submittal of the IS/MND to the City. Therefore, the “baseline” conditions for the Project impact analysis do not include any “discount” for removing existing uses.

As shown in Table 4.3-5, 3, *Operational Emissions*, the proposed Project’s maximum daily, unmitigated operational criteria air pollutant emissions would be well below the SCAQMD’s-recommended regional pollutant thresholds. The Project will also have to comply with SCAQMD Rule 2305 – Warehouse Indirect Source Rule which will further reduce potential operational emissions. Project operation, therefore, would not generate criteria air pollutant emissions levels that exceed SCAQMD regional CEQA thresholds. Impacts will be less than significant and no mitigation is required.

In addition, implementation of project design features will help reduce operation-related air pollutants are outlined in Section 2.8, Project Characteristics (Project Design Features).

**Table 4.3-5
Operational Emissions**

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ¹					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	5.5	<0.1	<0.1	0.0	<0.1	<0.1
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile	1.5	20.2	26.3	0.2	8.6	2.4
Off-Road	0.0	0.0	0.0	0.0	0.0	0.0
Total	7.0	20.3	26.4	0.2	8.6	2.4
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Source: Table 4-16, MIG 2023 (Appendix A). Unmitigated emissions for Year 2024						
¹ Maximum daily ROG, CO, and SO _x occur in the summer. Maximum daily NO _x , PM ₁₀ , and PM _{2.5} emissions occur in the winter						
² Totals may not equal due to rounding.						

In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable (SCAQMD, 2003; page D-3). As described above, the proposed Project's construction and operational emissions would be below applicable SCAQMD regional thresholds for criteria air pollutants. Therefore, the proposed Project would not result in a cumulatively considerable increase in criteria air pollutants. Impacts would be less than significant and no mitigation is required.

c) **Less than Significant Impact.** The SCAQMD identifies sensitive receptors as populations more susceptible to the effects of air pollution than the general population. Some people are more affected by air pollution than others. Sensitive air quality receptors include specific subsets of the general population that are susceptible to poor air quality and the potential adverse health effects associated with poor air quality. Both CARB and the SCAQMD consider residences, schools, parks and playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes to be sensitive air quality land uses and receptors (SCAQMD 2017a; CARB 2005). The potential sensitive air quality receptors adjacent or in close proximity to the perimeter of the Project area (i.e., within 1,000 feet) include:

- Single-family homes on W. 5th Street approximately 82 feet north of the site

The proposed Project would generate both short-term construction emissions and long-term operational emissions that could impact sensitive residential receptors located near the Project; however, as described in more detail below, the proposed Project would not generate short-term or long-term emissions that exceed SCAQMD-recommended localized significance thresholds or result in other substantial pollutant concentrations.

Localized Significance Thresholds

In addition to regional CEQA thresholds addressed in Threshold 4.3.b above, the SCAQMD has also developed Local Significance Thresholds (LSTs) that represent the maximum emissions from a project that are expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, which would result in significant adverse localized air quality impacts.

Construction. The Project's maximum daily construction emissions are compared against the SCAQMD's recommended LSTs thresholds in Table 4.3-6, *Construction LST Impacts*. Consistent with the SCAQMD's LST methodology, the emissions included in the construction LST analysis are on-site emissions only, and the LST against which these on-site emissions are compared are based on the project size, in acres, as determined using the equipment assumptions generated by CalEEMod and the SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. The LST thresholds are for source receptor area (SRA) 34 (Central San Bernardino Valley), the SRA in which the proposed Project is located, and are based on a receptor distance of 25 meters (82 feet), the closest LST receptor distance thresholds recommended for use by the SCAQMD.

**Table 4.3-6
Construction LST Impacts**

Construction Phase ^{1, 2}	Maximum On-Site Pollutant Emissions (Pounds Per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site Preparation	11.6	13.7	6.4	3.6
Grading	17.6	21.0	3.8	2.1
Trenching	6.1	8.3	0.4	0.4
Building Construction	1.7	2.1	0.1	0.1
Paving	2.1	3.2	0.1	0.1
Architectural Coating	1.4	1.8	0.1	0.1
SCAQMD LST Threshold³	270	1,746	14	8
Exceeds Threshold?	No	No	No	No

Source: Table 4-17, MIG 2023 (Appendix A).

¹ Emissions estimated using CalEEMod, v. 2020.4.0. Estimates are based on default model assumptions unless otherwise noted in this document.

² Emissions presented are worst-case emissions and may reflect summer or winter emission levels. In general, due to rounding, there is no difference between summer and winter emission levels for the purposes of this table.

³ The LSTs are based on a 5.0-acre project size and 25-meter receptor distance.

As shown in Table 4.3-6, the proposed project's construction emissions would not exceed the SCAQMD's recommended construction LSTs. Project construction, therefore, would not generate criteria air pollutant emissions levels that exceed SCAQMD local CEQA thresholds. Construction impacts will be less than significant and no mitigation is required.

Operations. Typically, operations-related LSTs become a concern when there are substantial on-site stationary or on-site mobile sources (e.g., heavy-duty or idling trucks) that could impact surrounding receptors, which is not the case for the proposed project. Nonetheless, the proposed project's maximum daily operational emissions are compared against the SCAQMD's-recommended LSTs in Table 4.3-7, *Operational LST Impacts*. The LSTs are for SRA 34, in which the proposed Project is located, and a project size of 5.0 acres which represents a "worst case" analysis since the site is actually 11 acres.

**Table 4.3-7
Operational LST Impacts**

Emissions	Maximum On-Site Pollutant Emissions (Pounds Per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	0.1	0.1	0.1	0.1
Energy Sources	0.1	0.1	0.1	0.1
Mobile Sources	0.6	0.6	0.2	0.1
Total On-Site Emissions	0.6	0.7	0.2	0.1
SCAQMD LST Threshold	270	1,746	4	2
Threshold Exceeded?	No	No	No	No

Source: Table 4-18, MIG 2023 (Appendix A)

As shown in Table 4.3-7, the proposed Project's on-site operational emissions would not exceed the SCAQMD's recommended operational LSTs. Project operation, therefore, would not generate criteria air pollutant emissions levels that exceed SCAQMD's LST CEQA thresholds. Operational impacts will be less than significant and no mitigation is required.

Carbon Monoxide Hotspots

According to the Project traffic study, the proposed Project would add approximately 642 total new vehicle trips and approximately 372 passenger car equivalent (PCE) trips to the local roadway infrastructure per day, with approximately 11 and 18 PCE trips added during the AM and PM peak hours, respectively. PCE trips reflect the impact of large trucks, buses, and recreational vehicles on traffic flow. 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. A PCE factor of 1.5, 2.0, and 3.0 was applied to the 2-, 3-, and 4-axle trucks, respectively, that were estimated in the traffic study for the proposed Project. Based on data from the Bay Area Air Quality Management District (BAAQMD), the Project is not located in an area where hourly or daily traffic volumes are anywhere close to 44,000 vehicles per hour, and the SCAQMD does not have CO Hotspots significance criteria. However, the BAAQMD screening threshold is 100,000 vehicles per day. Furthermore, the Project would not add enough trips to result in these hourly or daily traffic volumes either. The proposed Project would not cause intersection volumes to exceed any daily (100,000) or hourly (44,000) screening vehicle volumes maintained by the SCAQMD and other regional air districts and, therefore, would not result in significant CO concentrations.

Project-Level Health Risk Assessment

As described previously, the nearest sensitive receptor (also referred to as the "modeled residential MEIR location") is located approximately 82 feet north of the Project site. Project-related construction activities would emit PM₁₀ from equipment exhaust which includes diesel particulate matter (DPM), a Toxic Air Contaminant (TAC). The operation of trucks during operation of the proposed Project would also generate PM₁₀ from equipment exhaust during idling and truck operation.

Individual Cancer Risks. The predicted locations of the annual, unmitigated point of maximum impact (PMI), maximally exposed individual resident receptor (MEIR), and maximum exposed individual worker (MEIW) receptor for DPM exposure during construction are shown in **Exhibit 4.3-1, Construction DPM Concentrations**, measured in micrograms per cubic meter (ug/m³), along with contours of pollutant concentrations in proximity of the Project site. The predicted PMI and MEIW are at the same location, which is east of the Project site on a parcel operated by American Rentals. Chronic non-cancer health hazards were assessed at the MEIW location. Since the PMI for DPM exposure is located on land that is not occupied by a receptor on a permanent basis, lifetime excess cancer risks and chronic non-cancer health hazards, which are based on exposure to annual average pollutant concentrations, were not estimated for the modeled PMI location.

Health risks were assessed at the modeled residential MEIR location, which is located north of the Project site at 27112 West 5th Street. The project Health Risk Assessment (HRA) for residential receptors evaluated worst-case carcinogenic and non-carcinogenic risks to child and adult receptors. Potential health risks were also assessed for worker receptors at the commercial property east of the site.

The calculated, maximum unmitigated cancer risk at the MEIR would be approximately 7.1 excess cancers per million population, as shown in Table 4.3-8, *Project-Related Cancer Risks*. This unmitigated cancer risk value would be less than the SCAQMD threshold of 10 excess cancers per million population. Receptor exposure to construction emissions at the MEIR, which would only occur during the first year of exposure, would contribute to approximately 80% (approximately 5.7 excess cancers per million population) of the total cancer risk. During operation of the warehouse (years 2 through 30), emissions would be generated by diesel truck trips traveling to and from the Project site, as well as their on-site idling. The MEIR's exposure to operational emissions would comprise the other 20% (1.3 excess cancers per million population) of the total cancer risk. The cancer risks presented above for the MEIR location are conservative in that they account for a receptor born at the MEIR location at the beginning of construction activities. Appendix A of the Air Quality/HRA contains more details regarding the conservative risk parameters recommended by the Office of Environmental Health and Hazard Assessment (OEHHA), and used in this HRA, for infants and children.

Table 4.3-8
Project-Related Cancer Risks

Receptor	UTM Location		Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)		Excess Cancer Risk (per million population)		
	East	North	Construction	Operational	Construction	Operational	Total
PMI	480445.05	3774124.61	0.06691	0.00371	--	--	--
MEIR	480359.09	3774177.61	0.03801	0.003	5.7	1.3	7.1
MEIW	480445.05	3774124.61	0.06691	0.00215	0.2	0.1	0.3

Source: Table 4-19, MIG 2023 (Appendix A)

Cancer Burden. The average cancer risk based on the lifetime exposure scenario (70 years), is $2.34\text{E}-07$ (approximately 0.234 cases per million people). The product of cancer risk and the estimated population (352) is 0.000082 and does not exceed the SCAQMD threshold of 0.5 excess cancer cases.

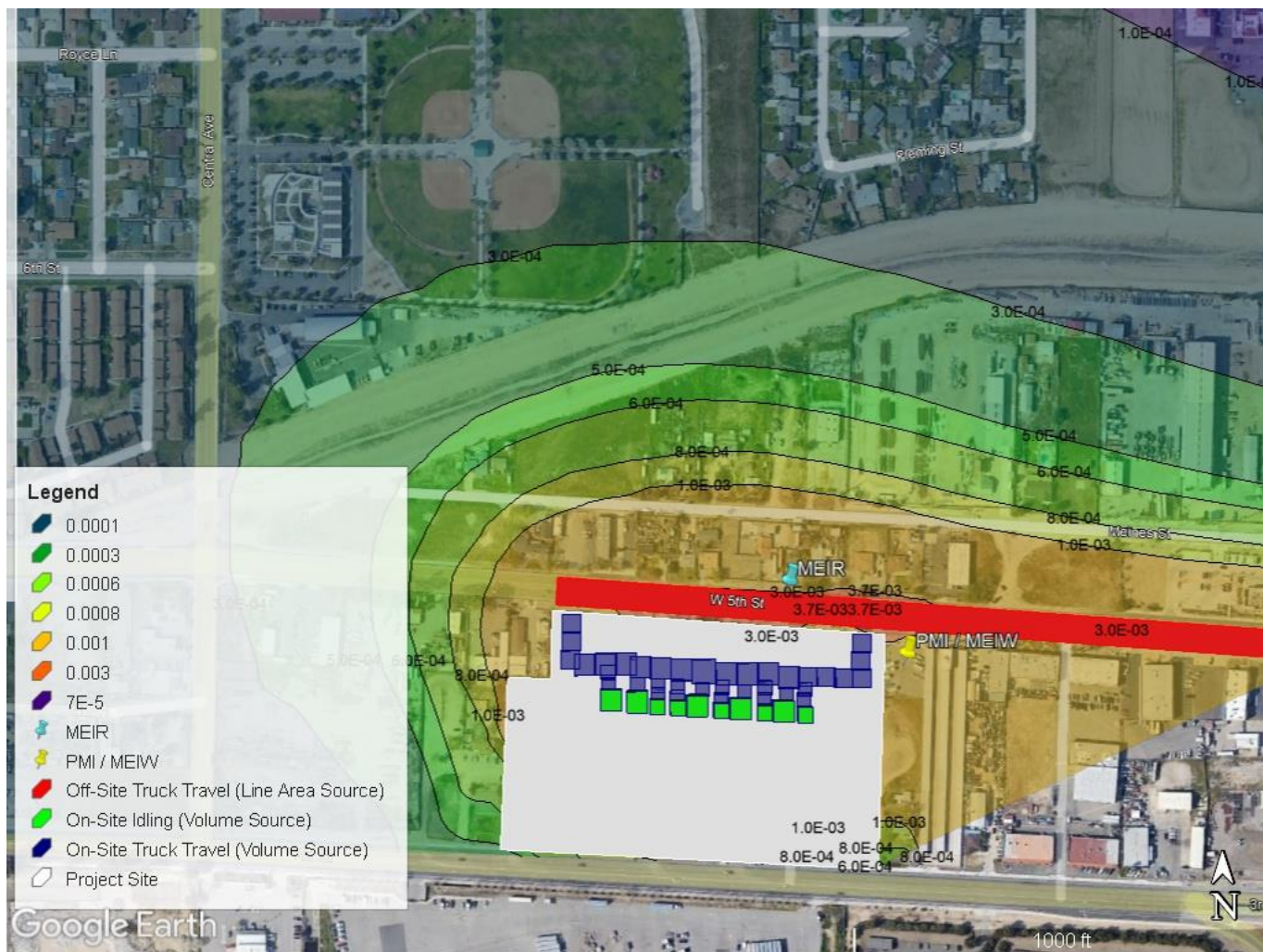
Non-Cancer Risk. The maximum annual average DPM concentration at any receptor location would be approximately $0.06691 \mu\text{g}/\text{m}^3$ which would occur at the MEIW location during construction. Based on the chronic inhalation Reference Exposure Levels (REL) for DPM ($5 \mu\text{g}/\text{m}^3$), the calculated chronic hazard quotient during the maximum exposure to DPM concentration would be 0.013, which is below the SCAQMD's non-cancer hazard index threshold value of 1.0. All other receptor exposure scenarios would result in a non-carcinogenic hazard index of less than 0.013.

Exhibit 4.3-1
Construction DMP Concentrations (ug/m³)



Source: Figure 4-3, MIG 2023

Exhibit 4.3-2 Operational DMP Concentrations ($\mu\text{g}/\text{m}^3$)



Source: Figure 4-4, MIG 2023

Cumulative TAC Emissions

A project impact that is individually limited may nonetheless contribute to a larger cumulative impact. A “cumulative impact” is defined as two or more impacts from related past, current, or probable future projects which, when considered together, are considerable. The cumulative HRA also considers the emissions from the Highland West Industrial Warehouse Building Project (Highland West Project), which is located approximately 200 feet west of the Project site. The Highland West Project would be constructed approximately one year prior to the proposed Project.

The cumulative cancer health risk from receptor exposure to DPM emissions associated with the Highland West Project and the proposed Project is shown in Table 4.3-9, *Cumulative Cancer Risks at MEIR*. The cumulative MEIR would be located at 27014 West 5th Street, which also corresponds to the Project’s MEIR location where risks would be the greatest per the OEHHA methodology, which gives a higher weighting to health risks during the first few years of life; see Appendix A for more details).

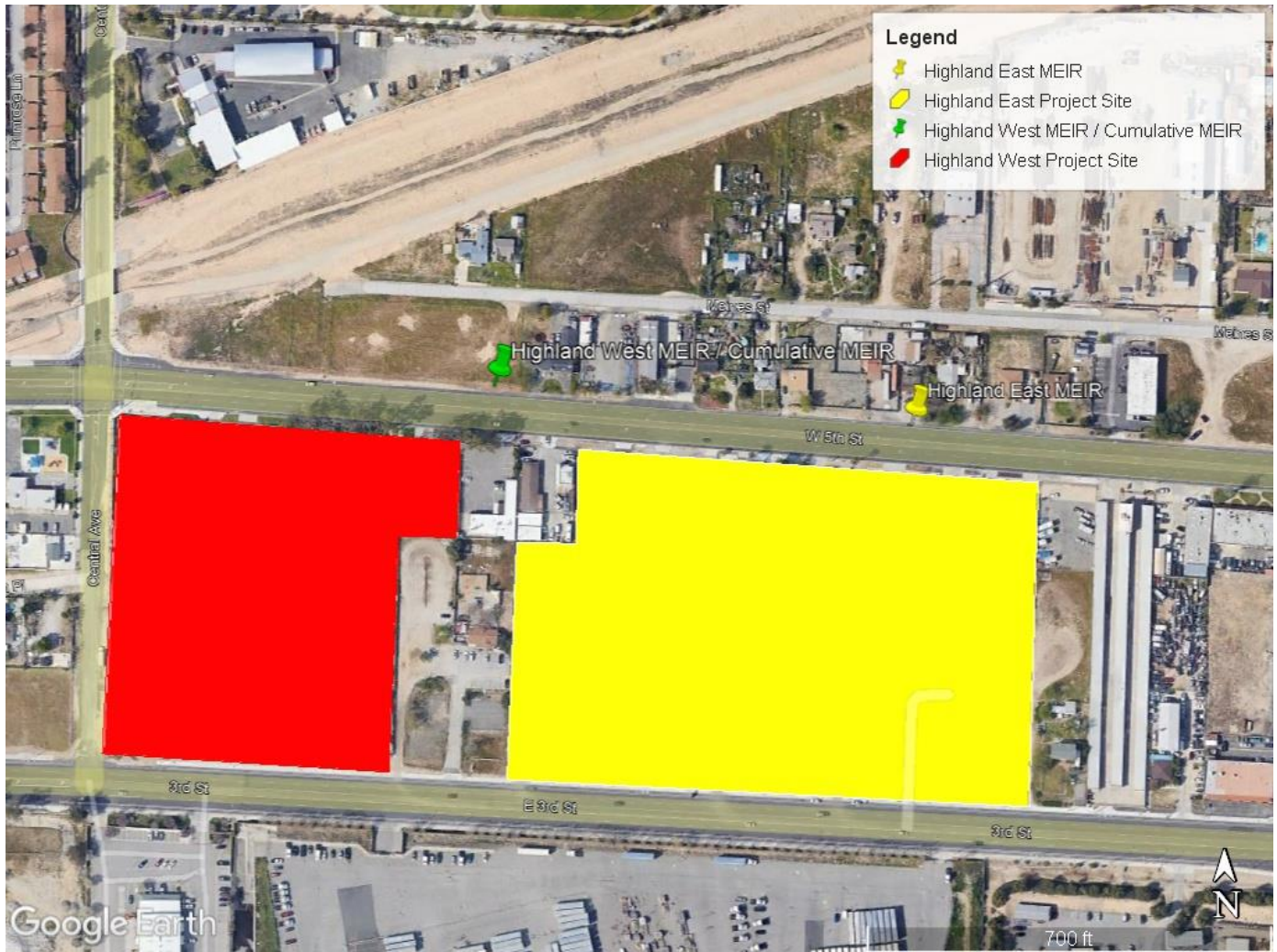
Exhibit 4.3-3, Cumulative Warehouse MEIR, shows the locations of the two warehouse projects and the MEIR locations for the proposed Project's project-level HRA and cumulative HRA.

**Table 4.3-9
Cumulative Cancer Risks at MEIR**

Year	MEIR UTM Location		Annual Average DPM Concentration (µg/m³)			Excess Cancer Risk (per million population)		
	East	North	Highland West	Highland East	Combined	Highland West	Highland East	Combined
Year 1	480145.05	3774199.6	0.03894	--	0.03894	6.4	0.0	6.4
Year 2			0.00101	0.01437	0.01538	0.2	2.3	2.5
Year 3-30			0.00101	0.00096	0.00197	0.4	0.4	0.8
Total						7.0	2.7	9.7
Cumulative Cancer Risk Project-Specific Goal ^(a)								10.0
Goal Exceeded?								No
Source: Table 4-21, MIG 2023 (Appendix A)								
(a) As a conservative and health-proactive approach, this Initial Study also utilizes the SCAQMD project-level cancer risk threshold of 10 excess cancers per million as a Project-specific goal for helping describe and characterize potential cumulative risks that could be associated with the proposed Project (i.e., the Project's risks plus those of other projects). The City is not adopting or proposing to use the 10 excess cancers per million Project-specific goal as a CEQA threshold or for general use; rather, it is only intended to provide additional context and information on the magnitude of the proposed Project's potential cumulative cancer risk impact.								

As shown in Table 4.3-9, the calculated maximum unmitigated cumulative construction risks at the cumulative MEIR would be approximately 6.4 excess cancers per million population during the first year of exposure (i.e., while the Highland West Project is being constructed). During the cumulative MEIR's second year of exposure (i.e., once the Highland West Project becomes operational and construction on the proposed Project has commenced), the cancer risks from the two projects would be approximately 2.5 excess cancers per million population (with 0.2 of that risk coming from the Highland West Project and 2.3 of that risk coming from the proposed Project). During the cumulative MEIR's exposure to operational emissions from both the Highland West Project and proposed Project during years 3 through 30, risks would be approximately 0.8 excess cancers per million population, with the Highland West Project and proposed Project both contributing 0.4 excess cancers per million to that total. As with the individual project-level assessment for the proposed Project (i.e., HRA prepared for the Highland East MEIR earlier this analysis) the cumulative MEIR's risks are based on the conservative assessment that a receptor would be born at the cumulative MEIR's location at the commencement of construction activities at the Highland West Project site. In total, construction and operational emissions from the two projects would result in cumulative cancer risk of 9.7 excess cancers per million, which is below the Project-specific goal of 10.0 excess cancers per million. Therefore, the Project would not result in a cumulative impact with regard to receptor exposure to TACs and no mitigation is needed.

Exhibit 4.3-3 Cumulative Warehouse MEIR Locations



Source: Figure 4-5, MIG 2023

d) **Less than Significant Impact.** According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed Project would result in the construction of a new industrial use that could generate odors related to equipment use (e.g., oils, lubricants, fuel vapors); however, these activities would generally be located across the road from the nearest sensitive receptors, giving potentially odorous compounds time and space to disperse. The activities proposed as part of the Project would not generate sustained odors that would affect substantial numbers of people, nor nearby sensitive receptors. Therefore, impacts related to odor will be less than significant and no mitigation is required.

4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

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?	☐	☐	☐	☒
--	--------------------------	--------------------------	--------------------------	-------------------------------------

A general Biological Resources Assessment⁸ (BRA) was prepared by MIG for the 11.09-acre Project site. The purpose of the report was to verify the type, location, and extent of potential sensitive biological resources on the Project site and vicinity (Appendix B). Prior to visiting the Project site, available relevant data on the biological characteristics, sensitive habitats, and species potentially present on or near the Project site was reviewed. Additionally, aerial photography and USGS topographic map were examined. The site occurs within the USGS 7.5' series Redlands Quadrangle. The Project site is flat with elevations ranging from 1,172 to 1,186 feet AMSL.

a) **Less than Significant with Mitigation Incorporated.** The Project site has been historically altered by development so it can all be classified as disturbed and/or developed (although at present it is vacant with no existing buildings or supporting improvements).

Vegetation

The majority of the vegetation present on the site is non-native and the site receives regular clearing to maintain compliance with fire code requirements. The site is dominated by non-native vegetation, including bromes (*Bromus tectorum*, *B. madritensis* spp. *Rubens*), Old han schismus (*Schismus barbatus*), Russian thistle (*Salsola tragus*), storksbills (*Erodium botrys*, *E. cicutarium*), prostrate pigweed (*Amaranthus albus*), short-pod mustard (*Hirschfeldia incana*), and various planted ornamental trees and shrubs. Native species are occasional within the Project site and include disturbance-adapted species such as California suncup (*Eulobus californicus*), slender buckwheat (*Eriogonum gracile*), slender sunflower (*Helianthus gracilentus*), common rabbitbrush (*Ericameria nauseosa*), telegraph weed (*Heterotheca grandiflora*). No rare plant surveys were conducted on the site due to the high degree of disturbance and the lack of suitable habitat for any listed or otherwise sensitive plant species. Although five Sensitive Plant Communities are listed on governmental databases as occurring in the general region, none of these are expected to occur on the Project site. In addition, no USFWS-designated critical habitat areas for any federally listed animals are present.

Special-status plants are defined as: (1) plants that are federal- or state-listed as rare, threatened, or endangered, (2) federal and state candidates for listing, (3) plants assigned a Rank of 1 through 4 by the California Native Plant Society (CNPS) Inventory, and (4) plants that qualify under the definition of "rare" in the CEQA, section 15380. The Project site was initially determined to provide potentially suitable habitat for a total of 88 special-status plant species based on the proximity of the Project to previously recorded occurrences in the region, vegetation types and habitat quality, topography, elevation, soil types, and other species-specific habitat requirements. However, based on an assessment of actual habitat suitability and a focused late-season survey conducted on April 5, 2022, none of the 88 plant species are expected to occur on the Project site (see Appendix B), and no additional studies or mitigation measures were recommended.

Wildlife

Wildlife species observed or expected on the urbanized Project site include those tolerant of human activity such as songbirds, small mammals, and reptiles. The site is located adjacent to busy streets and construction activity with high levels of noise and human disturbance that may preclude high

levels of wildlife activity, which is assumed to be the cause of the limited wildlife activity observed onsite.

Special-status wildlife species include those species listed as endangered or threatened under the Federal or State Endangered Species Acts (i.e., FESA or CESA); candidates for listing by the USFWS or CDFW; species of special concern to the CDFW; and birds protected by the California Department of Fish and Wildlife (CDFW) under California Fish and Game Code (CFGF) Sections 3503 and 3513. Approximately 68 special-status wildlife species have been recorded in the vicinity of the Project site. Of these wildlife species, 62 are not expected to actually occur on the Project site due to the absence of essential habitat requirements for the species, the distance to known occurrences and/or the species distributional range, the limited availability of foraging and nesting habitat, amount of site disturbance from past and present land uses, and/or the proximity of existing human-related disturbances. Appendix C of the Biological Resources Assessment contains a table presenting the special-status wildlife species considered and evaluated for their potential occurrence on the project site, including species-specific habitat requirements.

The following six sensitive species have some potential to occur on-site:

- Cooper's hawk (*Accipiter cooperii*), a California Watch List Species;
- Burrowing Owl (*Athene cunicularia*), a California Species of Special Concern;
- Ferruginous Hawk (*Buteo regalis*), a California Watch List Species;
- Pallid Bat (*Antrozous pallidus*), a California Species of Special Concern;
- Western Mastiff Bat (*Eumops perotis californicus*), a California Species of Special Concern; and
- Lesser Long-nosed Bat (*Leptonycteris yerbabuenae*), a California Species of Special Concern.

Although these species have a potential to occur onsite, the clearing of trees and the demolition of buildings and improvements on the site earlier in the year removed any potential habitat for bats. Therefore, at this time no impacts to the three sensitive bat species are anticipated. Potential impacts to the three bird species are addressed by **Mitigation Measure BIO-1** if any of them are ground nesting on the site at the time of survey. Potential impacts to burrowing owl are also addressed in **Mitigation Measure BIO-1**.

Nesting Birds

Nesting birds are protected under CFGF Sections 3503, 3503.5, and 3512, which prohibits the taking of active bird nests. Ruderal vegetation and ornamental trees within the Project site provide marginally suitable nesting habitat for songbirds, including common species protected by the code. There is potential for ground- and tree-nesting birds to establish nests on the project site prior to initiation of project construction. To prevent impacts to nesting birds, **Mitigation Measure BIO-1** recommends a pre-construction nesting bird survey.

No other special-status wildlife species are expected to be impacted by project construction due to a lack of suitable habitat (refer to Appendix C) and high degree of site disturbance due to existing development within and surrounding the project site. No impacts are expected to Critical Habitat for San Bernardino Kangaroo Rat, which is adjacent to the project (see Exhibit 4.4-1). However, the Project site is separated from the Critical Habitat area by W. 5th Street, a primary arterial in this portion of Highland that carries a large amount of traffic each day. It should be noted that Appendix D of the BRA contains a small mammal report and correspondence with the USFWS regarding protected species.



Source: ESRI, USFWS, MIG, 2022

Legend

- Highland East
- USFWS Final Critical Habitat



Exhibit 4.4-1 USFWS Critical Habitat Map

CHIPT Highland East Warehouse Building and Office Space
Highland, California



This Page Intentionally Left Blank

Burrowing Owl

A burrowing owl survey⁹ was conducted on the site in summer 2022. Pipes and other round structures present on the property can provide habitat for burrowing owl, (*Athene cunicularia*). Suitable habitat type (Disturbed and/or Developed) for burrowing owl was also determined to be present onsite and burrowing owl are known to occur less than one mile from the Project site. Construction activities may impact burrowing owl in a manner like those already described for nesting birds. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. **Mitigation Measure BIO-1** recommends a pre-construction survey to reduce potential impacts on burrowing owl to less than significant levels.

In summary, implementation of **Mitigation Measure BIO-1** will prevent any 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 CDFW or U.S. Fish and Wildlife Service (USFWS). With the recommended mitigation, impacts will be reduced to less than significant levels.

Mitigation Measures

BIO-1 Pre-construction Survey for Burrowing Owl and Ground Nesting Birds. Prior to ground disturbance, the following two surveys shall be conducted to determine presence or absence of burrowing owl or ground nesting birds on the site.

Burrowing Owl. No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's *Staff Report on Burrowing Owl*, dated March 7, 2012. If burrowing owl are found on the Project Site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the Project Site.

Ground Nesting Birds. To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, including tree, shrub, or vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all trees

and other potential nesting habitats (e.g., trees and shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

b) No Impact. The Biological Resources Assessment included an overview of potential U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW riparian/riverine/vernal pool jurisdictional resources. There are no waterways, wetlands, or riparian vegetation subject to regulation by the USACE, CDFW, or RWQCB present on the Project site. In addition, no water features were identified in the National Wetlands Inventory on or near the Project site. There is an earthen drainage channel (City Creek) north of the Project site across West 5th Street, however, the Project site does not have any connectivity to this channel as there is no evidence (e.g., watermarks, vegetation, or other characteristics) that water flows from this waterway onto or off of the Project site. Therefore, there will be no impacts to these resources and no mitigation is required.

c) No Impact. There are no water-related features located on or immediately adjacent to the Project site that represent jurisdictional resources regulated by the Santa Ana RWQCB, CDFW, or the USACE. Therefore, a formal jurisdictional delineation was not prepared and no impact will occur.

d) Less Than Significant with Mitigation Incorporated. Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of potential wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information.

Providing functional habitat connectivity between natural areas is essential to sustaining healthy wildlife populations and allowing for the continued dispersal of native plant and animal species. The regional movement and migration of wildlife species has been substantially altered due to habitat fragmentation over the past century. This fragmentation is most commonly caused by development of open areas, which can result in large patches of land becoming inaccessible and forming a functional barrier between undeveloped areas. Additional roads associated with development, although narrow, may result in barriers to smaller or less mobile wildlife species. Habitat

fragmentation results in isolated islands of habitat, which affects wildlife behavior, foraging activity, reproductive patterns, immigration and emigration or dispersal capabilities, and survivability. Wildlife corridors can consist of a sequence of stepping-stones across the landscape (i.e., discontinuous areas of habitat such as isolated wetlands), continuous lineal strips of vegetation and habitat (e.g., riparian strips and ridge lines), or they may be parts of larger habitat areas selected for its known or likely importance to local wildlife.

The Project site is bordered by existing high-traffic roadways, industrial uses, and residential development and does not represent a wildlife movement corridor. Therefore, no impact will occur and no mitigation is required.

The site contains no water resources that could support migratory fish species. However, nesting birds, including many species that migrate through this area, are protected under CFGC 3503, 3503.5, and 3512, which prohibits the taking of active bird nests. Ruderal vegetation and ornamental trees within the Project site may provide marginally suitable nesting habitat for songbirds, including common species protected by the state code. It is also possible, though not likely, that raptors may nest in nearby trees that could be affected by Project construction. Although onsite buildings were demolished and trees removed earlier in the year, there is a potential for migratory ground-nesting birds to establish nests on the Project site prior to initiation of project construction. To prevent impacts to migratory nesting birds, **Mitigation Measure BIO-1** has been included which require pre-construction nesting bird and bat surveys. With these measures, potential impacts to migratory bird species will be reduced to less than significant levels.

e) **No Impact.** At present, there are a few ornamental trees present onsite but all buildings and related improvements were demolished recently. The Highland Municipal Code (HMC) Chapter 8.36, Heritage Trees, addresses removal of large (trunk circumference of 24 inches or greater) or a grove of trees that contributed in some way to the history of the City. In addition, HMC Chapter 16.64, Environmental Management, Sub-chapter 16.64.040 deals with Heritage Tree Preservation Requirements as follows:

HMC Chapter 16.40.350, Street Lighting and Tree Planting, addresses the planting of new trees along public street right-of-ways which is a requirement of most new development. In addition, HMC Chapter 2.20, Historic and Cultural Preservation Board, outlines when the Board can address historic trees or groves in the City. However, as noted above, the site contains no historic trees. There are no other HMC Chapters that deal with trees as potential biological or cultural resources.

The Project site contains no significant trees in terms of either size or historical importance. Therefore, the Project does not conflict with this HMC requirement. Therefore, the Project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. There will be no impacts and no mitigation is required.

f) **No Impact.** The purpose of the Biological Resources Assessment was to document the existing biological resources, identify general vegetation types, and assess the potential biological and regulatory constraints associated with the proposed development within the Project site. There is no Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) on the Project site or in the immediate surrounding area. Although the land to the south is designated as Critical Habitat for the San Bernardino Kangaroo Rat, there is no HCP related to that species that affects the Project site. Therefore, there will be no impacts and no mitigation is required.

4.5 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

A California Historic Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC) Record Search for the Project site and vicinity was performed by CRM TECH in November 2022. A Cultural Resources Assessment for the Project was conducted by CRM TECH and dated December 1, 2022 (See Appendix C).

a) **No Impact.** Following the establishment of Mission San Gabriel in 1771, the San Bernardino Valley became a part of the mission's vast land holdings. The name "San Bernardino" was bestowed on the region when the Asistencia and an associated mission rancho, both bearing that name, were established in present-day Loma Linda. After gaining independence from Spain in 1821, Mexico began to secularize/dismantle the mission system in Alta California. During the next 12 years, former mission ranchos throughout Alta California were divided and granted to various prominent citizens of the area. In 1842, the former mission rancho of San Bernardino was granted to members of a prominent Los Angeles family, the Lugos. After the American annexation of Alta California in 1848, the Lugos sold the entire land grant in 1851 to a group of Mormon settlers who promptly founded the town of San Bernardino, one of the first non-Indian settlements in the Inland Empire.

A few miles northeast of San Bernardino the present-day Highland area received the earliest Euroamerican settlers (mid-1850s). The name "Highland" was adopted by the settlers in 1883 when the area had a large enough population to warrant the establishment of a school district, and the town of Highland was laid out in 1891. During much of the 20th century, Highland remained a small rural settlement best known for citrus cultivation. In recent decades, Highland experienced rapid growth as a bedroom community in Los Angeles which culminated in its incorporation in 1987.

The Project site consists of 9 adjacent parcels which until recently supported a variety of light industrial and related outdoor storage uses. These uses were demolished in December 2022 and the site is currently vacant. Prior to the recent demolition, the site was evaluated and five parcels were found containing buildings that were modern in origin or had been modernized/alterd to such an extent that they no longer retained sufficient historical character to relate to their period of origin. Two were

commercial properties that were previously recorded and found not to qualify as “historical resources” under CEQA provisions. The current Cultural Resources Assessment concurs with this finding.

The buildings on the remaining four parcels were all single-family residences that dated to the 1940-1950 era and retained a recognizable level of historical character despite various degrees of past alterations. Therefore, these four properties were recorded into the California Historical Resources Inventory and were designated temporarily as Sites 3879A-1H to 3879A-4H, pending assignment of official identification numbers. None of these four properties met any of the criteria for listing in the California Register of Historical Resources, and therefore none met the statutory definition of a “historical resource” under CEQA. No other potential “historical resources” were encountered during preparation of the Cultural Resources Assessment which concluded that no “historical resources” existed within the Project area so the City allowed their demolition in December 2022.

The Project site did not contain any structures that could be considered historic in nature. Therefore, the Project would not result in any adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. Additionally, in accordance with Assembly Bill 52 (AB 52), which added various provisions to the California Public Resources Code (PRC) that concern Tribal Cultural Resources, including Section 21080.3.1(d), the City is in the process of consulting with the San Manuel Band of Mission Indians - Kizh Nation and the Gabrieleno Band of Mission Indians. No historic resources have been identified on the Project site by either Tribe. As such, the Project will have no impact on historical resources and no mitigation is required.

b) Less than Significant with Mitigation Incorporated. The San Bernardino Valley and adjacent San Bernardino Mountains have been inhabited by Native American tribes for thousands of years. The present-day Highland area is a part of the homeland of the Serrano people which is centered in the San Bernardino Mountains but also includes part of the San Gabriel Mountains, much of the San Bernardino Valley, and the Mojave River valley in the southern portion of the Mojave Desert. The name “Serrano” was derived from a Spanish term meaning “mountaineer” or “highlander.”

Although contact with Europeans may have occurred as early as 1771, Spanish influence on the Serrano was minimal until the early 1800s when a mission asistencia was established on the southern edge of Serrano territory. By the end of the mission era in 1834, most of the Serrano in the western portion of their traditional territory were removed to the nearby missions. In the eastern portion, a series of punitive expeditions in 1866-1870 resulted in the death or displacement of almost all remaining Serrano population in the San Bernardino Mountains. Today, most Serrano descendants are affiliated with the Yuhaaviatam of San Manuel Nation, formerly known as the San Manuel Band of Mission Indians), the Morongo Band of Mission Indians, or the Serrano Nation of Indians.

The Project site is located in proximity to the Lytle Creek Channel which is considered a sensitive archaeological area in the City’s General Plan and through consultation with the Gabrieleno Band of Mission Indians - Kizh Nation (GBMI-KN) and the San Manuel Band of Mission Indians (SMBMI(see Appendix C). In order to comply with CEQA Guidelines Section 15064.5, PRC 5097.98(d)(1), the Native American Graves Protection and Repatriation Act (NAGPRA), and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the proposed Project will incorporate **Mitigation Measures CUL-1 through CUL-6** to reduce potentially significant impacts to previously undiscovered archaeological resources to a less than significant level. With implementation of the recommended mitigation measures, potential impacts to sensitive archaeological resources will be reduced to less than significant levels relative to GBMI-KN resources.

In addition, the Yuhaaviatam of San Manuel Nation (YSMN), formerly known as the San Manuel Band of Mission Indians, indicated the site is within their tribe’s ancestral territory and thus is of interest to

them. The YSMN recommended **Mitigation Measures CUL-7 and CUL-8** to address potential impacts to their tribal resources (see Appendix C).

Mitigation Measures

- CUL-1 Retain a Native American Monitor/Consultant.** The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians - Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the Project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.
- CUL-2 Unanticipated Discovery of Tribal Cultural and Archeological Resources.** Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources.
- CUL-3 Public Resources Code Sections 21083.2(b) for Unique Archaeological Resources.** Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin 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, they shall be offered to a local school or historical society in the area for educational purposes.
- CUL-4 Archaeological Monitoring.** Due to the heightened cultural sensitivity of the proposed Project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed Project area (which includes, but is not limited to, tree/shrub removal and planting,

clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. Monitoring may cease if the archaeologist and Tribal monitor agree that continued efforts are unneeded, and if the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) agrees with the assessment. A Monitoring and Treatment Plan that is reflective of the Project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to SMBMI. Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the Project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-5 Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed Project area, Tribal monitors representing the San Manuel Band of Mission Indians shall be present for all ground-disturbing activities that occur within the proposed Project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of Tribal monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. Monitoring may cease if the archaeologist and Tribal monitor agree that continued efforts are unneeded, and if the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) agrees with the assessment. A Monitoring and Treatment Plan that is reflective of the Project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist, as detailed within SMBMI-CUL-1, and submitted to the Lead Agency for dissemination to SMBMI. Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the Project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-6 Treatment of Cultural Resources. If a pre-contact cultural resource is discovered during Project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the Archaeological Monitor/applicant, and the Lead Agency shall confer regarding treatment of the discovered resource, as detailed within the Monitoring and Treatment Plan. A research design shall be developed and will include a plan to evaluate the resource for significance under CEQA criteria. The research design shall also acknowledge that, regardless of significance under CEQA, all finds are subject, if feasible, to avoidance/preservation in place as treatment. Should any resource(s) not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by SMBMI. All plans for analysis shall be reviewed and approved by the applicant and SMBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during

Project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI. All reburials are subject to a reburial agreement that shall be developed between the landowner and SMBMI outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.). Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can include the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees. All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

CUL-7 Tribal Consultation. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and an archaeologist meeting the Secretary of Interior's professional qualification standards in archaeology shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in TCR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural 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.

CUL-8 Tribal Resources. 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 for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

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.

c) **Less than Significant with Mitigation Incorporated.** Although the San Bernardino Valley has been inhabited by Native Americans for thousands of years, no known human remains are anticipated to be located on or beneath the Project site. However, these findings do not preclude the existence of previously unknown human remains located below the ground surface, which may be encountered during construction excavations associated with the Project. Similar to the discussion in Threshold 4.5.a above regarding archaeological resources, it is also possible to encounter buried human remains during construction given the proven prehistoric occupation of the region, the identification of multiple surface archaeological resources within a half-mile of the Project site, and the favorable natural conditions that would have attracted prehistoric inhabitants to the area. As a result, **Mitigation Measures CUL-9 through CUL-15** have been incorporated to ensure any buried human remains related to the Gabrieleno Band of Mission Indians - Kizh Nation (GBMI-KN) or the Yuhaaviatam of San Manuel Nation (YSMN), formerly known as the San Manuel Band of Mission Indians, will be properly preserved. With implementation of the recommended mitigation measures, potential impacts to buried human remains related to GBMI-KN and YSMN will be reduced to less than significant levels as a result of construction of the proposed warehouse Project.

Mitigation Measures

- CUL-9 Unanticipated Discovery of Human Remains and Associated Funerary Objects.** Native American human remains are defined in PRC 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 PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation 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 that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.
- CUL-10 Resource Assessment and Continuation of Work Protocol.** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at a minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).
- CUL-11 Kizh-Gabrieleno Procedures for Burials and Funerary Remains.** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures 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 burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains 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.

- CUL-12 Treatment Measures.** Prior to the continuation of ground-disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. 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.
- CUL-13 Professional Standards.** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.
- CUL-14 Inadvertent Discoveries of Human Remains/Funerary Objects.** In the event that any human remains are discovered within the Project area, ground-disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify SMBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations

within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties. It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

CUL-15 Human Remains. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

4.6 – Energy

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption or energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

CARB Low Carbon Fuel Standard Regulation

CARB initially approved the Low Carbon Fuel Standard (LCFS) regulation in 2009, identifying it as one of the nine discrete early action measures in its original 2008 Scoping Plan to reduce California's GHG emissions. Originally, the LCFS regulation required at least a 10% percent reduction in the carbon intensity of California's transportation fuels by 2020 (compared to a 2010 baseline). On September 27, 2018, CARB approved changes to the LCFS regulation that require a 20% reduction in carbon intensity by 2030. These regulatory changes exceed the assumption in CARB's 2017 Climate Change Scoping Plan, which targeted an 18% reduction in transportation fuel carbon intensity by 2030 as one of the primary measures for achieving the state's GHG 2030 target.

According to the *GHG Report*, the California Department of Tax and Fee Administration, statewide taxable sales figures indicate a total of 13,822 million gallons of gasoline and 3,142 million gallons of diesel fuel were sold in California in 2021. Although exact estimates are not available by county, the *GHG Report* indicates that San Bernardino County accounted for approximately 6.5% and 9.0% of total statewide gasoline and diesel sales, respectively, in 2020.

Renewable Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2017. The *2003 Integrated Energy Policy Report* recommended accelerating that goal to 20 percent by 2010, and the *2004 Energy Report Update* further recommended increasing the target to 33 percent by 2020. The state's *Energy Action Plan* also supported this goal. In 2006 under Senate Bill 107, California's 20 percent by 2010 RPS goal was codified. The legislation required retail sellers of electricity to increase renewable energy purchases by at least one percent each year with a target of 20 percent renewables by 2010. Publicly owned utilities set their own RPS goals, recognizing the intent of the legislature to attain the 20 percent by 2010 target.

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08 requiring "all retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020." The following

year, Executive Order S-21-09 directed the California Air Resources Board, under its AB 32 authority, to enact regulations to achieve the goal of 33 percent renewables by 2020.

In October 2015, Governor Brown signed Senate Bill 350 to codify ambitious climate and clean energy goals. One key provision of SB 350 is for retail sellers and publicly owned utilities to procure “half of the state’s electricity from renewable sources by 2030.”

The State’s RPS program was further strengthened by the passage of SB 100 in 2018. SB 100 revised the State’s RPS Program to require retail sellers of electricity to serve 50% and 60% of the total kilowatt-hours sold to retail end-use customers be served by renewable energy sources by 2026 and 2030, respectively, and requires 100% of all electricity supplied come from renewable sources by 2045.

On a regional level, The *GHG Report* indicates Southern California Edison (SCE) is the electricity utility provider in the Project region. In 2021, SCE sold approximately 82,048 million kilowatt-hours (kWh) of electricity and approximately 43% of the electricity that SCE delivered to customers came from carbon-free resources, including solar energy (approximately 15%), wind energy (approximately 10%), and geothermal energy (approximately 6%). In comparison, the *GHG Report* indicates Southern California Gas Company (SCGC) provides natural gas service in the Project region and is the principal distributor of natural gas in Southern California for residential, commercial, and industrial uses. The annual sale of natural gas by SCGC to all of its users in 2022 was approximately 5.23 million kiloBritish Thermal Units (kBtu).

Note: The analysis provided below is based on use of the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 in the Energy Analysis¹⁰ prepared by MIG in June 2023 (Appendix A).

a) **Less than Significant Impact.** Implementation of the Project would increase the demand for electricity and natural gas at the project site and gasoline consumption in the region during construction and operation. These potential increases are discussed in more detail below.

It should be noted the Energy and Greenhouse Gas Emissions (GHG) Study prepared by MIG (Appendix A) included a number of “project design features” that were included in the analysis of energy and GHG impacts (i.e., they are not mitigation measures). These features, which are based on the example best practices identified in the California Attorney General Office’s “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act” document, will be incorporated as conditions of approval for the Project and are summarized in Table 6-1, *Project Energy/GHG Conditions of Approval*.

Table 4.6-9
Project Energy/GHG Conditions of Approval

Project Design Feature	Condition of Approval (COA) Needed	How the COA Reduces Energy and GHG Emissions
Use of Zero Emission On-site Operations Equipment (forklifts, pallet jacks, etc.)	The Applicant will require the use of electric forklifts, pallet jacks, and other cargo/material handling equipment as a lease condition / condition of sale.	The use of electric forklifts and other equipment avoids on-site emissions from diesel-, compressed natural gas- and other fossil-fuel-powered types of this equipment.

Project Design Feature	Condition of Approval (COA) Needed	How the COA Reduces Energy and GHG Emissions
Cool/Reflective Roof Materials	The Applicant has designed the proposed Project to include the use of light colored roofing materials with a solar reflective index (SRI) not less than 78.	The use of light colored roofing materials reduces heat gain and energy usage associated with building heating and cooling systems.
Solar-ready Building Roof	The Applicant has designed the proposed building's roof to facilitate and optimize the future installation of a solar photovoltaic (PV) system.	The installation of solar PV system will reduce facility energy demand and indirect emissions associated with energy production.
Cool Pavements	The Applicant has designed the Project's parking areas and drive aisles to be constructed with a solar-reflective cool pavement (concrete).	The use of solar-reflective cool pavements reduces heat island effects that can lead to increased demand for energy in building heating and cooling systems.
Electrical Rooms	The Applicant has designed the proposed building's electrical maintenance rooms to be 25% larger than required for the current building design.	The installation of a larger electrical room supports the future installation and expansion of emissions reduction infrastructure such as solar PV systems, alternative space and water heating systems, electric vehicle/truck charging equipment, etc.
Off-road Equipment Selection	The Applicant shall require construction bid, contract, procurements, and other similar documents including a requirement for the contractor to use the highest rated California Air Resources Board (CARB) engine tier technology available at the time of construction unless proof is provided that such equipment is not available and cannot be reasonably obtained from other sources within the jurisdiction of the SCAQMD.	The use of late-model off-road equipment meeting CARB and U.S. EPA Tier 3 and Tier 4 emissions standards (either through the original equipment manufacturer or the use of retrofit devices that reduce specific pollutant emissions) reduces construction emissions and potential pollutant concentrations at sensitive receptor locations.

Project Design Feature	Condition of Approval (COA) Needed	How the COA Reduces Energy and GHG Emissions
Electric-powered hand tools, forklifts, and pressure washers	The Applicant shall require construction bid, contract, procurements, and other similar documents including a requirement for the contractor to electric-powered hand tools, forklift, and pressure washers during Project construction. The Applicant shall also require the construction contractor to designate an area where electric-powered construction vehicles and equipment can charge.	The use of electric-powered hand tools, forklifts, and pressure washers on-site emissions from diesel-, compressed natural gas- and other fossil-fuel-powered types of this equipment.
Electric Service During Construction	The Applicant shall require construction bid, contract, procurements, and other similar documents including a requirement for the contractor to provide temporary electrical utility service to the construction site and limit the use of diesel-powered generators.	Connecting to electric service during construction and limiting the use of diesel-powered generators minimizes on-site emissions during construction.

Electricity

Construction. Temporary electric power would be required for lighting and electronic equipment (e.g., computers) located in trailers used by the construction crew. In addition, onsite electrical hookups are used to power handheld construction equipment such as saws, nailguns, drills, etc. Project construction is estimated to require approximately 2,222 kiloWatt hours (kWh) of electricity for worker trips. However, the electricity used for such activities would be temporary and would have a negligible contribution to the Project's overall energy consumption.

Operation. During operation of the new warehouse, the Project would consume electricity from appliance operation, general building systems (e.g., lighting, heating, ventilation, and air conditioning (HVAC) equipment, and outdoor lighting. Based on estimates generated by CalEEMod, the proposed Project would consume approximately 1,426,594 kWh per year of electricity. In 2021, SCE sold approximately 82,048 million kWh of electricity to all its customers so Project consumption would equal less than 0.002% of SCE service supplies in 2021. The proposed Project would be required to comply with the standards contained in the CalGreen Code (i.e., Part 11 of the Title 24 Building Code) that requires the warehouse building constructed at the site meet energy efficiency standards that improve upon those from previous years. Title 24 standards include limits on lighting levels and fixtures, amount and type of air conditioning that can be provided, hot water heating, and reduced consumption standards for electric appliances.

Electricity would also be consumed by the operation of electric vehicles by future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Urban Crossroads traffic memorandums / SCAQMD guidance document, the proposed Project is anticipated to generate approximately 3,769,501 vehicle miles

traveled (VMT) on an annual basis. The average fuel economies and vehicle fleet mix attributable to the proposed Project were used to estimate the amount of electricity consumed from vehicle trips associated with the proposed Project. The Project is estimated to consume approximately 19,017 kWh of electricity from vehicle fuel consumption on an annual basis (see Appendix A). The estimating of electricity used by vehicles is a relatively recent occurrence generated by the increase in electric passenger vehicles, although electric onsite equipment such as forklifts and “yard hogs” is much more common. Electric vehicles and equipment must meet safety and energy efficiency standards promulgated by the Federal Occupational Safety and Health Administration (OSHA). Therefore, the use of electricity by vehicles on and off the Project site is considered to be efficient and not wasteful.

The proposed Project would also indirectly benefit from other, regulatory actions taken at the state level. For example, SB 100 requires 60% of the power purchased by California come from renewable sources by 2030. SB 100 further requires all retail electricity be carbon-free by 2045, and SB 1020 sets an interim target of having 90% of supplied retail electricity be carbon-free by 2035. Based on these state-wide mandates, electricity consumed at the site will become more and more green (e.g., not requiring the burning of fossil fuels), which will lead to the more efficient use of energy resources.

Although electricity would increase at the site under implementation of the Project, the proposed facility would be designed to the 2022 Title 24 Building Code standards, and benefit from other actions taken at the State level. Furthermore, as discussed in Section 2.8, Project Characteristics (Project Design Features), the proposed Project includes site features that support the future installation of the electrical infrastructure necessary to support EV charging at truck docks in the future, which would support the transition to zero-emission trucks / near zero-emission trucks over the next few decades. For these reasons, the electricity consumed by the Project is not considered to be inefficient or wasteful.

Natural Gas

Construction. Natural gas consumption is not anticipated during construction of the Project. Fuels used for construction would generally consist of diesel and gasoline, which are discussed in the next subsection. Any amounts of natural gas that may be consumed during Project construction would be nominal and would have a negligible contribution to the Project’s overall energy consumption.

Operation. Natural gas consumption would be required during operation of the Project for various purposes, such as hot water and building HVAC. Based on estimates generated by CalEEMod, the proposed Project would consume approximately 4,684,741 thousand British Thermal Units (kBtu) per year of natural gas. The annual sale of natural gas by SCGC to all of its users in 2022 was approximately 5,230 million kBtu, therefore, the Project would consume less than 0.001 of SCGC’s annual service in the region. Although natural gas consumption would increase at the site under implementation of the Project, the building envelope, HVAC, lighting, and other systems, would likely be more efficient than other warehouses in the area, because of the energy efficiency requirements outlined in the 2022 Title 24 Building Code. For example, Title 24 sets energy consumption limits for appliances such as furnaces and ovens that use natural gas which makes them very efficient to older less efficient models in use in older facilities. Therefore, the natural gas that would be consumed by the Project is not considered to be inefficient or wasteful.

Diesel and Gasoline Fuel

Construction. Diesel and gasoline fuels, also referred to as petroleum in this subsection, would be consumed throughout construction of the Project. Fuel consumed by construction equipment would be the primary energy resource consumed over the course of construction, and VMT associated with the transportation of construction materials (e.g., deliveries to the site) and worker trips to and from the site

would also result in petroleum consumption. Whereas on-site, heavy-duty construction equipment and delivery trucks would predominantly use diesel fuel, construction workers would generally rely on gasoline-powered vehicles to commute to and from the Project site.

The operation of heavy-duty, off-road equipment associated with Project construction would consume approximately 10,533 gallons of diesel fuel. Worker, vendor, and hauling trips associated with Project construction are estimated to consume approximately 17,944 and 9,907 gallons of gasoline and diesel fuel, respectively. In total, Project construction is estimated to require approximately 17,944 gallons of gasoline and 20,440 gallons of diesel.

The *GHG Report* indicates that San Bernardino County accounted for approximately 898.5 million gallons of gasoline and 282.8 million gallons of diesel fuel sales in the state in 2020. Project construction would therefore represent 0.002% of the gasoline sold in the state and 0.007% of the diesel fuel sold in the state in 2020. On- and off-road petroleum-powered vehicles/equipment would be subject to various rules and regulations at the federal and state levels. On the federal level, on-road vehicles would be subject to the SAFE Vehicles Rule. On the state level, off-road equipment at the site would also be required to comply with CARB's Airborne Toxic Control Measures, which restricts heavy-duty diesel vehicle idling to five minutes. In addition, the efficiency of petroleum use is related to numerous other state-wide regulations and programs, such as the LCFS (on- and off-road vehicles/equipment), ACC Program (on-road passenger vehicles), and ACT Program (on-road trucks). In addition, on the local level (i.e., immediate Project-level) project design features contained in the Air Quality and Health Risk Assessment Report prepared for the proposed Project, would require the use of later engine model years (i.e., equipment meeting U.S. EPA and CARB Tier III Final Emission Standards). Since petroleum use during construction would be temporary and is a necessary component when conducting development activities, it would not be wasteful or inefficient. Note that Project Design Features are detailed in Section 2.8, Project Characteristics (Project Design Features).

Operation. Gasoline and diesel would be consumed during operation of the proposed Project. Both forms of petroleum fuel would be consumed from future workers and customers traveling to and from the site. As estimated in CalEEMod, based on the trip generation rates and trip distances provided for in the Urban Crossroads traffic memorandums / SCAQMD guidance document, the proposed Project is anticipated to generate approximately 3,769,501 VMT on an annual basis. Based on the average fuel economies and vehicle fleet mix attributable to the proposed Project, vehicle trips associated with the proposed Project are estimated consume approximately 25,320 and 275,459 gallons of gasoline and diesel, respectively, on an annual basis. These fuel consumption estimates are based on vehicle efficiency in 2024, and would decrease in future years as trucks become more fuel-efficient and zero emission vehicle (ZEV) trucks are more commonly available and used within San Bernardino County.

The *GHG Report* indicates that San Bernardino County accounted for approximately 898.5 million gallons of gasoline and 282.8 million gallons of diesel fuel sales in the state in 2020. Project operation would therefore represent 0.002% of the gasoline sold in the state and 0.02% of the diesel fuel sold in the state in 2020.

There are numerous regulations in place that require and encourage fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and ZEVs in California. In addition, per the requirements identified in SB 375, CARB adopted a regional goal for the SCAG region of reducing per-capita GHG emissions from 2005 levels by 8% by 2020 and 19% by 2035 for light-duty passenger vehicles. The SB 375 goal would help reduce emissions from worker and customers trips at the site. The proposed Project would also benefit from actions taken at the state level with regard to the ACT

Program and Sustainable Freight Plan. The implementation of these programs will help reduce the number of diesel trucks on California roadways and improve the fuel efficiency of those diesel trucks that remain in operation. Accordingly, operation of the Project is expected to decrease the amount of petroleum it consumes in the future due to advances in fuel economy.

Although the Project would increase petroleum use in the region during construction and operation, the calculations above indicate the amount would be a small fraction of the statewide use, and would have its overall fuel consumption decrease over time. As such, petroleum consumption associated with the Project would not be considered inefficient or wasteful and would result in less than significant energy use impacts and no mitigation is required.

b) **Less than Significant Impact.** The proposed Project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed above, the project would be subject to the California Title 24 Building Code energy efficiency standards for non-residential buildings, which would help reduce energy consumption. Equipment and vehicles associated with construction and operation of the project would also be subject to fuel standards at the state and federal level. The project would inherently benefit from programs implemented to achieve the goals of the Sustainable Freight Plan, such as the turnover of older, less fuel-efficient trucks, as fuel economy standards are rolled out and ZEV trucks becomes more widely available and cost-effective for business. The Project would not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation is required.

4.7 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 (1997), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

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

An updated comprehensive geotechnical constraints report¹¹ was prepared for the Project site by Southern California Geotechnical dated September 7, 2022 (*Geo Report*, **Appendix D1**). An Infiltration Report¹² was also prepared by SCG dated September 8 2022 (**Appendix D2**).

a.i) **Less than Significant Impact.** The Project site is not located in a known fault zone, however, there are numerous regional faults¹³ in and surrounding the City of Highland. The southern branch of the San Andreas fault runs through the northern portion of Highland and the San Bernardino Mountains, although the Project site is southwest of this fault zone. Additionally, the San Jacinto fault zone is located approximately 4.5 miles southwest of the City of Highland, and the Project site is northeast of this fault. The Project is located in an area subject to strong ground shaking from earthquakes, and significant damage to structures during a large earthquake may occur.¹⁴ Structures should be designed to resist collapse and provide reasonable protections from injury. Adhering to the design and repair requirements adopted from the 2019 California Building Code (CBC)¹⁵ will be sufficient for protecting persons and structures from potential significant impacts. With this regulatory compliance, impacts are determined to be less than significant and no mitigation is required.

a.ii) **Less than Significant Impact.** The Project site is subject to strong groundshaking given its proximity to fault zones and Southern California location. The *Geo Report* indicates the site could be subject to horizontal ground acceleration of 0.871 g or almost 90% of the force of gravity exerted horizontal to the ground surface (acceleration at 1.0 second period or S_1). Per the City's General Plan, the potential for ground shaking and seismic-related damages are less significant the farther a development is from the San Andreas fault zone.¹⁶

The Project is subject to the seismic design standards of the CBC, and while structures may be damaged during earthquakes, adherence to these design requirements will minimize damage to property within the structure, as they are designed to not collapse, and thus protect occupants of those structures as well. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. With regulatory compliance with the CBC, potential impacts due to strong ground shaking would be less than significant and no mitigation is required.

a.iii) **Less than Significant Impact.** Liquefaction is a form of ground failure that occurs when soil transforms from a solid state to liquefied condition due to intense seismic ground shaking. Liquefaction typically occurs in loose granular materials, with saturated silt and clay contents, at shallow groundwater tables less than 50 feet from the surface. Part of the City of Highland is susceptible to liquefaction and ground failure from seismically induced ground shaking. However, the City's General Plan indicates that the Project site is not located in an area with a high susceptibility to liquefaction.¹⁷ Most of Highland, including the Project site, is located over the San Bernardino portion of the Upper Santa Ana Valley groundwater basin, also referred to as the Bunker Hill Subbasin.¹⁸ Groundwater wells in Highland near the Project site have been recorded as having a depth below ground surface between 200 and 500 feet, significantly deeper than wells typically susceptible to liquefaction and ground failure.¹⁹

The *Geo Report* states the San Bernardino County Land Use Plan, Geologic Hazard Overlays, Redlands Quadrangle, FH31C, indicates that the Project site is not located within a zone of liquefaction susceptibility. In addition, the subsurface conditions at the boring locations are not considered to be conducive to liquefaction. These conditions generally consist of medium-dense to very dense, well-graded, granular soils, and no evidence of a historic high ground water table within the upper 50 feet of

the ground surface. Based on the mapping performed by San Bernardino County and the conditions encountered at the boring locations and documented in the *Geo Report*, liquefaction is not considered to be a design concern for this Project.²⁰

The *Geo Report* indicates that the Project area is not susceptible to subsidence in soils below the zone of removal during construction operations¹⁵. Ground subsidence is estimated to be 0.1 foot but the actual amount will vary depending on the machinery and frequency of use. Impacts will be less than significant per the *Geo Report*, and the Project will be required to comply with the recommendations of the *Geo Report*. With this regulatory compliance, impacts will be less than significant and no mitigation is required.

a.iv) **No Impact.** The City's General Plan outlines areas in Highland susceptible to landslides which are in the foothill areas of the San Bernardino Mountains. The Project site is generally flat and not located in an area with a high susceptibility to landslide or ground subsidence.¹⁵ There will be no impacts and no mitigation is required.

b) **Less than Significant Impact.** Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. The Project site is vacant and located in an already developed area of Highland, so there is the potential to expose surface soils to wind and water erosion during construction activities and moving vehicles. However, wind erosion would be minimized through soil stabilization measures required by SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Water erosion would be prevented through the City's standard erosion control practices required pursuant to the CBC and the National Pollution Discharge Elimination System (NPDES) regulations, such as silt fencing, fiber rolls, or sandbags. Following Project construction, the site itself would consist of mostly impervious surfaces and landscaping. Impacts related to soil erosion would be less than significant with implementation of existing regulations and no mitigation is required.

c) **Less than Significant Impact.** Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to a combination of gravity and ground shaking. Lateral spreading has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As previously discussed, the Project site is in an area with a low susceptibility to liquefaction, and thus a low potential for lateral spreading to occur on the Project site.¹⁵ The Project site is vacant and located in a flat developed area, and any soil instability on the Project site would not be cause for a landslide (see also discussion under Threshold 5.7.a.iv above).

The *Geo Report* conducted on the Project site determined that development was feasible with consideration to seismic design standards outlined in the CBC.¹⁵ The Project is required to be constructed in accordance with the CBC and the recommendations of the *Geo Report*. These actions are considered regulatory compliance and not unique mitigation under CEQA. Therefore, regulatory compliance would limit hazard impacts arising from unstable soils to less than significant levels and no mitigation is required.

d) **No Impact.** The Geo Study determined that near-surface soils in the Project site are non-expansive, and so there are no design considerations warranted for expansive soils.¹⁵ No impacts will occur.

e) **No Impact.** The Project area is served by the City's municipal sewer system.²¹ The proposed Project would connect to this system and would not require use of septic tanks. No impact will occur.

f) **Less than Significant with Mitigation Incorporated.** The Project site consists of nine previously disturbed parcels and a number of light industrial, truck storage, and residential structures were removed from the site in December 2022. Any buried paleontological resources would likely have been already been uncovered or destroyed during these activities. However, it is still possible that fossiliferous materials may be found at depth below the site during Project grading.

In the event that paleontological materials are uncovered, **Mitigation Measures GEO-1 through GEO-4** are recommended to reduce potentially significant impacts to previously undiscovered paleontological resources and/or unique geological features that may be accidentally encountered during Project implementation to a less than significant level. With implementation of the recommended mitigation measures, potential impacts to paleontological resources will be reduced to less than significant levels as a result of construction of the proposed warehouse.

Mitigation Measures

GEO-1 Conduct Paleontological Sensitivity Training for Construction Personnel. The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct a Paleontological Sensitivity Training for construction personnel prior to commencement of excavation activities. The training will include a handout and will focus on how to identify paleontological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event; the duties of paleontological monitors; notification and other procedures to follow upon discovery of resources; and, the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

GEO-2 Conduct Periodic Paleontological Spot Checks During Grading and Earth-moving Activities. The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct periodic Paleontological Spot Checks beginning at depths below six (6) feet to determine if construction excavations have extended into older Quaternary deposits. After the initial Paleontological Spot Check, further periodic checks will be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for Paleontological Resources will be required. The Applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.

GEO-3 Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered. In the event that paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where

construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the Applicant and the City. Work shall be allowed to continue outside of the buffer area. The Applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

- GEO-4 Prepare Report Upon Completion of Monitoring Services.** Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the Applicant, the City, the Natural History Museums of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

4.8 – Greenhouse Gas Emissions

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Note: The analysis provided below is based on use of the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 as outlined in the Greenhouse Gas Emissions Analysis¹⁰ performed by MIG in June 2023 (See Appendix A).

a) **Less than Significant Impact.** Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). GHG that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants because climate change is global in scale, both in terms of causes and effects. Some GHG are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change. The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs

– carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. The six most common GHG's are described below.

- Carbon Dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Sulfur hexafluoride
- Hydrofluorocarbons (HFCs) and
- Perfluorocarbons (PFCs).

GHG emissions from human activities contribute to overall GHG concentrations in the atmosphere and the corresponding effects of global climate change (e.g., rising temperatures, increased severe weather events such as drought and flooding). The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO₂, which has a GWP of one. By comparison, CH₄ has a GWP of 25, which means that one molecule of CH₄ has 25 times the effect on global warming as one molecule of CO₂. Multiplying the estimated emissions for non-CO₂ GHGs by their GWP determines their carbon dioxide equivalent (CO₂e), which enables a project's combined global warming potential to be expressed in terms of mass CO₂ emissions.

SCAQMD GHG Thresholds

The proposed Project would generate GHG emissions from both short-term construction and long-term operational activities. As described in more detail below, the Project would not generate GHG emissions that exceed SCAQMD-recommended GHG thresholds. In order to provide guidance to local lead agencies on determining the significance of GHG emissions in their CEQA documents, the SCAQMD convened the first GHG Significance Threshold Working Group (Working Group) meeting on April 30, 2008. To date, the SCAQMD has not adopted a numerical threshold for determining the significance of GHG emissions in the Basin; however, as an interim threshold based on guidance provided in the CAPCOA *CEQA and Climate Change* handbook, the SCAQMD has considered adopting and recommending for use a non-zero threshold that captures approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD in 2019 using this interim method is 10,000 Metric Tons of CO₂ equivalents (MTCO₂e) per year for industrial projects.

The SCAQMD's interim 10,000 MTCO₂e per year for industrial land uses was intended to address GHG emissions through the Year 2020, consistent with AB 32 GHG emissions reduction goals at the state level. Since the proposed Project would become operational as early as 2024 (i.e., four years after 2020), the 10,000 MTCO₂e per year interim threshold is not directly applicable to the proposed Project. As such, in addition to the 10,000 MTCO₂e per year interim threshold, this analysis also uses a Project-specific GHG emissions goal of 6,000 MTCO₂e per year, which demonstrates progress towards the state's next GHG emission reduction goal in 2030 (i.e., 40 percent below 1990 levels by 2030).

The 6,000 MTCO₂e per year goal was developed by taking the SCAQMD's 10,000 MTCO₂e per year, which was the threshold to reduce emissions back to 1990 levels, and reducing it by 40 percent (10,000 MTCO₂e/yr (1 - 0.4) = 6,000 MTCO₂e/yr). This reduction is consistent with the GHG reductions required under SB 32. This linear reduction approach oversimplifies the threshold development process. The City is not adopting nor proposing to use 6,000 MTCO₂e as a CEQA GHG threshold for general use; rather, it is only intended for to provide additional context and information on the magnitude of the proposed Project's GHG emissions.

Project GHG Emissions

The proposed Project would generate GHG emissions from both short-term construction and long-term operational activities. As described in more detail below, the proposed Project would not generate short-term or long-term emissions that exceed the SCAQMD GHG interim threshold of 10,000 MTCO₂e per year or the Project-specific goal of 6,000 MTCO₂e per year.

Construction. Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the Project site during demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHG upon completion, unlike operational emissions that would be continuous year after year. Accordingly, the SCAQMD recommends amortizing construction GHG emissions over a 30-year period and including them with operational emissions estimates. This normalizes construction emissions so that they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. GHG emissions from construction of the proposed Project were estimated using CalEEMod, Version 2020.4.0 based on the anticipated construction schedule and construction activities. The proposed Project's total construction emissions, as estimated using CalEEMod V.2020.4.0, are shown in Table 4.8-1, *Construction GHG Emissions*.

Table 4.8-10
Construction GHG Emissions

Construction Year	GHG Emissions (MT/YR)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
2023	326.4	0.1	<0.1	332.6
2024	4.4	0.1	<0.1	4.4
Total	326.4	0.1	<0.1	332.6
<i>Amortized (over 30 years)</i>	8.2	0.1	<0.1	8.3
Source: Table 6-2, MIG 2023 (Appendix A)				

Operations. Once operational, the proposed Project would generate emissions of GHG from area, energy, mobile, water/wastewater, and solid waste sources. The proposed Project's operational GHG emissions are shown in Table 4.8-2, *Operational GHG Emissions*.

Table 4.8-11
Operational GHG Emissions

Source	GHG Emissions (MT/YR) ¹			
	CO ₂	CH ₄	N ₂ O	MTCO ₂ e
Mobile	3,335.6	0.2	0.4	3,471.8
Area	<0.1	<0.1	0.0	<0.1
Energy	137.0	<0.1	<0.1	137.8
Waste	46.4	2.7	0.0	115.0
Water	134.2	1.8	<0.1	193.2
Amortized Construction	8.2	<0.1	<0.1	8.3
Total	3,597.2	4.8	0.5	3,926.0
SCAQMD 2020 Interim Threshold				10,000
Project-specific 2030 GHG Emissions Goal				6,000
SCAQMD Interim Threshold or Project-specific Goal Exceeded?				No
Source: Table 6-3, MIG 2023 (Appendix A)				
¹ <0.1 means that emissions are greater than zero but less than 0.05.				

As shown in Table 4.8-2, the proposed Project's potential increase in GHG emissions would be below the SCAQMD's 2020 interim threshold for industrial land uses of 10,000 MTCO₂e per year, as well as the Project-specific goal of 6,000 MTCO₂e that demonstrates progress toward the State's 2030 GHG emission reduction goals. Therefore, the proposed Project would not generate GHG emissions that have the potential to exceed SCAQMD thresholds. Impacts would be less than significant and no mitigation is required.

It should also be noted the Energy and Greenhouse Gas Emissions (GHG) Study prepared by MIG (Appendix A) included a number of "project design features" that were included in the analysis of energy and GHG impacts (i.e., they are not mitigation measures). These features, which are based on the example best practices identified in the California Attorney General Office's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document, will be incorporated as conditions of approval for the Project and are summarized in Table 6-1, *Project Energy/GHG Conditions of Approval*, in Section 4.6, *Energy*.

b) **Less than Significant Impact.** The proposed Project would not conflict with CARB's Scoping Plan, Sustainable Freight Plan, ACT Program, or regional RTP/SCS. The Project's consistency with these plans is described in more detail below.

CARB Scoping Plan

The 2022 *Climate Change Scoping Plan* is CARB's primary document used to ensure State GHG reduction goals are met. The 2022 *Climate Change Scoping Plan's* primary objective is to identify the measures needed to achieve the 2030 reduction target established under SB 32 and have the state achieve carbon neutrality by 2045, as established by AB 1279. The major elements of the plan are generally geared toward actions either CARB or other state entities will pursue, such as, but not limited to:

- Creation and future implementation of the Carbon Capture, Removal, Utilization, and Storage Program required by SB 905.

- Reducing embedded GHG emissions in supplied retail electricity by increasing the amount of electricity generated and supplied to the grid from renewable resources, consistent with the requirements identified in SB 100 and SB 1020 (i.e., 60% by 2030, 90% by 2035, 95% 2040, and 100% by 2045).
- Expansion of non-petroleum fueling stations across the state to support the transition to electric, hydrogen, and other alternatively-powered vehicles (e.g., through AB 2127 and SB 1075) while also increasing the use of mass transit, carpooling, and other trip reduction measures (e.g., through the implementation of SB 375).
- Leverage the capacity of California's natural and working lands to function as a sink for carbon emissions. Specifically, AB 1757 requires the CNRA, in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045. This is supported by SB 27, which requires CNRA to establish Natural and Working Lands Climate Smart Strategy, and for CARB to established specified CO₂ removal targets for 2030 and beyond.

Many of the measures identified in the *2022 Scoping Plan Update* are not applicable at the proposed Project's level; rather, the success of the plan primarily relies upon the State's actions to uphold and implement existing legislation and develop new plans and strategies to sequester, trap, and store emitted carbon emissions. Although most of these measures would be implemented at the State level, the GHG reductions achieved by these state measures would be realized at the local level. For example, regardless of actions taken by the City of Highland or County of San Bernardino, emissions generated through gasoline combustion in motor vehicles within the county would produce less GHG in 2030 than they do now. Similarly, the electricity consumed by on-site sources (e.g., lighting, building systems, etc.) would become greener over time as the State's RPS increases, consistent with the benchmarks established in SB 100 and SB 1020.

In addition to State measures, Appendix D to CARB's *2022 Scoping Plan Update* identifies potential actions that could be undertaken at a local level to support the State's climate goals. These actions primarily relate to preparing and implementing a qualified Climate Action Plan (CAP) at the local level. Appendix D goes on to provide specific recommendations regarding the types of measures the qualified CAPs should consider to align local actions with those being undertaken at the state-level. Section 3.2.1 of Appendix D also outlines project attributes for residential and mixed-use projects to qualitatively determine consistency with the *2022 Scoping Plan*. It does not, however, include specific criteria for qualitatively evaluating the consistency of other land uses (e.g., industrial) or air permitting with the *2022 Scoping Plan Update*. The proposed Project would not conflict with nor obstruct implementation of the *2022 Scoping Plan Update*.

Sustainable Freight Plan and ACT Program

The proposed Project would conflict with neither the Sustainable Freight Plan nor the ACT Program. Although the proposed Project would include the use of diesel trucks during operation, the Sustainable Freight Plan and ACT Program would be implemented at the state-level. Furthermore, the proposed Project includes sites features that support the future installation of the electrical infrastructure necessary to support EV charging at truck docks in the future, which would support the transition to zero emission trucks / near zero emission trucks over the next few decades. The proposed Project's GHG emissions would benefit (i.e., be reduced) over the long-term as older, less fuel-efficient, and higher polluting engines are decommissioned and replaced by newer, cleaner engines and ZEV trucks.

Southern California Association of Governments RTP/SCS

The Connect SoCal is the growth strategy and transportation plan whose primary intent is to demonstrate how the SCAG region will meet its GHG reduction target through the year 2045. Many of the measures included in the RTP/SCS are focused on: the expansion of, and access to, mass transit (e.g., light rail, commuter rail, bus rapid transit, etc.); planning growth around livable corridors; and locating new housing and job growth in high quality transit areas. Collectively, these land use plans, in conjunction with measures at the state-level to improve fuel efficiency standards, are designed to meet CARB's goal for the SCAB region for reducing per capita GHG emissions in the region by eight percent by 2020—compared with 2005 levels—and by 19 percent by 2035 (CARB, 2018).

The definitions of a “transit priority area” (TPA) and a “high quality transit corridor” are as follows:

* **TPA** is a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3). It also includes major transit stops that are included in the applicable regional transportation.

* **HQTC** is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The proposed Project is not located in a TPA nor is it located in a HQTA. While the Project would generate approximately 642 new daily trips, this quantity of trips would not cause a substantial increase in total citywide or regional VMT according to the SBCTA guidelines (Urban Crossroads, 2023). The Project meets VMT screening criteria. In addition, the Project is an industrial warehouse, which would not conflict with housing land use strategies contained in the RTP/SCS. For these reasons, the Project would not conflict with or otherwise obstruct implementation of Connect SoCal.

San Bernardino County Regional Greenhouse Gas Reduction Plan

The Project's GHG emissions would not conflict with the Regional Greenhouse Gas Reduction Plan (Reduction Plan). The Project would be consistent with the General Plan policies that form the basis for Highland's emission reduction measures in the Reduction Plan. In addition, the Project contains design features, as described in Section 2.8, Project Characteristics (Project Design Features), that support the goals of the Reduction Plan. Therefore, the Project would be consistent with the Reduction Plan.

City of Highland General Plan

The City's General Plan contains the following goals and policies related to GHG emissions:

In March 2006, the Highland City Council adopted the General Plan. The Conservation and Open Space Element and Community Design Element of the General Plan contains the following goals and policies related to energy consumption (City of Highland 2006):

Goal 5.17: Encourage site design practices that reduce and conserve energy use

- Policy 1. Encourage energy and environmentally sustainable designs— such as “Green Development Standards”—in the design and approval of new projects.
- Policy 2. Orient buildings on the site to maximize the natural ventilation provided by prevailing breezes.

- Policy 3. Incorporate passive solar design techniques including building orientation, energy-saving materials, roof overhangs, and window and door placement.
- Policy 4. Increase minimum building insulation standards.
- Policy 5. Encourage landscape design that cools buildings and blocks solar rays, such as the planting of deciduous trees on south and west facing elevations, and give Title 24 credit for landscaping.
- Policy 6. Channel runoff to permeable surfaces through the design of roofs and rain gutter systems and drainage courses.
- Policy 7. Encourage energy-efficient retrofitting of existing buildings, where practical, throughout the City including assisting applicants in the installation of more efficient HVAC (heating, ventilation, air conditioning) systems.
- Policy 8. Distribute and participate in incentive programs for incorporation of solar and photovoltaic panels (active solar) into existing or new buildings.

Goal 5.19: Continue to support air quality planning through land use policies, outreach efforts and coordination with regional air quality agencies.

- Policy 7. Encourage employers to develop trip reduction plans to promote alternative work schedules, ridesharing, telecommuting and work at-home programs, employee education and preferential parking.
- Policy 13. Continue comprehensive efforts to reduce energy consumption.

Goal 10.12: Encourage development that is energy efficient and environmentally sustainable.

- Policy 1. Encourage landscaping practices that increase energy efficiency and conserve natural resources such as:
- Policy 2. Planting trees and incorporating landscaped berms to provide shade and wind buffering
- Policy 3. Using native and drought-tolerant landscaping (“xeriscaping”) and drip irrigation to conserve water resources.
- Policy 4. Encourage designs that channel runoff to permeable surfaces.
- Policy 5. Encourage transit-oriented, infill development to make efficient use of existing land.
- Policy 6. Encourage site planning and building orientation that maximizes solar and wind resources for cooling and heating.

The evaluation of GHG emissions in Section 4.8.a above, plus the Project Design Features outlined in Section 2.8, Project Characteristics, demonstrate that the proposed Project will be consistent with these various goals and policies of the City General Plan relative to the reduction of GHG emissions. Therefore, impacts will be less than significant and no mitigation is required.

4.9 – Hazards and Hazardous Materials

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

A Phase I Environmental Site Assessment²² was prepared for the Project site dated March 1, 2022 (*Phase I ESA*). In addition, a Phase II Subsurface Investigation Report²³ was prepared and dated March 31, 2022 (*Phase II ESA*). Finally, a Soil Management Plan²⁴ was prepared dated June 28, 2022. All of these reports were prepared by Partner Engineering and Science, Inc., and are included in Appendix (E). The information in this section related to hazards and hazardous materials (hazmat) is based on the analysis provided in the *Phase I ESA* and *Phase II ESA* Reports.

a) **Less than Significant with Mitigation Incorporated.** Implementation of the Project could create significant hazards as a result of the routine transport, use, or disposal of hazardous materials during the construction of the proposed Project and subsequent operation of the Project.

Construction Impacts

Due to past industrial and automotive activities, the *Phase I ESA* found evidence of a number of conditions involving hazardous materials (hazmat) on the Project site. The report found significant oil staining, a potential concrete sump, suspected asbestos-containing materials and lead-based paints in older buildings, at least four residential septic tanks, and a former water well. The report found nine former underground storage tanks (USTs) that were removed in 1997 under the supervision of the San Bernardino County Fire Department (SBCFD). Closure letters were issued by the SBCFD for these facilities in 1997. The report also found a fuel dispenser island and canopy were not removed from the site but no soil samples were taken at the time of removal of the USTs.

Project construction activities would involve the temporary use and transport of fuels, equipment, earth and building materials, among other potentially hazardous materials. A Phase II Subsurface Investigation Report (*Phase II ESA*) was conducted to ascertain the potential impact of petroleum hydrocarbons (TPH-cc) and fuel-related volatile organic compounds (VOCs) to soil from potential releases from the hydraulic lifts and fuel dispenser island. The *Phase II ESA* found one of the soil samples tested from the site indicated a release of TPH-cc and fuel-related VOCs exceeding regulatory guidelines but concluded it did not represent a significant environmental condition.

The *Phase I ESA* also recommended that any UST piping that still remains onsite near the former dispenser island and canopy would need to be removed during grading. Any areas where subsurface hazmat conditions are found would need to have soil sampling and testing done to assure there were no health hazards for the planned industrial uses.

If still present after past demolition activities, the removal, clean up, and proper disposal of contaminated areas identified by the Phase I and II ESAs on the Project site will be required per **Mitigation Measure HAZ-1**. Per the Soil Management Plan, onsite soils tested were determined to be within regulatory guidelines for TPH and fuel-related VOCs. Impacts to the surrounding area through the disposal of onsite hazardous materials and waste would be less than significant. The Project will be in the jurisdiction, and in compliance, of the Environmental Protection Agency (EPA) and County of San Bernardino, which manage the inspection, regulation, transportation, use, and disposal of hazardous materials in Highland. Per the City's General Plan, the Project site and proposed project will be in compliance with federal, state, and local regulations pertaining to safe transport, use, handling, and disposal of hazardous materials. Impacts will be less than significant and no additional mitigation is required.

The contractor would be required to develop and adhere to a Health and Safety Plan pursuant to California state Health and Safety Code Chapter 6.95, Division 20 (§§ 25500-25532) which would minimize potentially hazardous effects of handling potentially hazardous materials during construction.

Construction operations would require the removal, clean up, and proper disposal of hazmat materials found on the Project site.

The above-ground buildings and improvements previously identified in the *Phase I ESA* were removed from the site in December 2022. However, preparation of the site to support the proposed light industrial warehousing development would require removal and confirmatory testing of contaminated areas. Therefore, **Mitigation Measure HAZ-1** is recommended to implement the various recommendations of the *Phase I ESA*, *Phase II ESA*, and *Soil Management Plan* reports.

Operational Impacts

With regard to Project operation, the site is zoned as Business Park, which are designated for light industrial, research and development, and office uses. The proposed Project is a warehouse, meant for the storage and movement of materials. The specific materials moved through the proposed warehouse site are unknown prior to its construction. In compliance with the San Bernardino County Hazardous Waste Management Plan (HWMP), the City of Highland requires businesses that use or generate hazardous materials to keep an inventory of the amounts and types on-site. The transport, use, and/or disposal of hazardous materials is not associated with or expected with this Project. The Project will generate limited amounts of Household Hazard Waste (HHW), wastes prohibited or discouraged from being disposed of at local landfills. The San Bernardino County Fire Protection District operates a Household Hazardous Waste Program, with 14 permanent HHW collection facilities. These facilities will allow easy disposal of any HHW generated on-site. Further, the Project will be in compliance of Chapter 16.40.130 "Hazardous Materials Management" of the Highland Municipal Code, which regulates the use and disposal of hazardous materials by businesses in Highland. Following local regulations and strategies, the use of common household hazardous materials, created waste, and their disposal do not present a substantial health risk to the community.

With implementation of the recommended mitigation measure, plus regulatory compliance regarding any hazmat found during grading, the Project would not create any significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials either during construction or operation of the Project. Impacts would be less than significant with mitigation.

Mitigation Measures

HAZ-1 Hazardous Materials Remediation. Prior to issuance of a building permit, the applicant shall document that the site has been remediated based on the recommendations included in the Phase I Environmental Site Assessment (*Phase I ESA*) prepared for the Project site dated March 1st, 2022 and the Phase II Subsurface Investigation Report (*Phase II ESA*) prepared and dated March 31, 2022. Both reports were prepared by Partner Engineering and Science, Inc., and are included in Appendix E of the IS/MND. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the San Bernardino County Fire Department, Hazardous Materials Division (as the County's Consolidated Unified Program Agency or CUPA), County Department of Public Health, California Department of Toxic Substances Control (DTSC), and other regulatory agencies if or as needed. Prior to issuance of a building permit, the applicant shall submit a closure report documenting the various hazardous materials characterization studies, their conclusions and recommendations, and all remediation activities for identified hazmat conditions.

Due to the age of the recently demolished buildings, there may still be asbestos-containing materials (ACMs) and/or lead-based paints (LBPs) present. These are considered Business

Environmental Risks (BERs) and sampling of possible ACMs and LBPs will need to be done on any remaining demolition materials onsite if they are present prior to grading. Other BERs identified on the Project site include oil spillage in former auto-maintenance areas, four septic tanks systems, and a potential concrete sump. Oil-stained soils shall be disposed of if encountered, the sump and septic tanks removed and abandoned with regard to applicable regulatory requirements.

Once all remaining demolition waste has been removed from the site, onsite soils shall be tested to determine if or to what degree they can be used for Project grading based on regulatory standards for industrial buildings. Prior to issuance of a grading permit, the applicant shall demonstrate to the satisfaction of the City Engineer that the onsite soils meet appropriate regulatory standards for industrial properties.

b) **Less than Significant Impact.** According to the State Water Resources Control Board Geotracker website²⁷, there are no open cases of leaking underground storage tanks (LUST) on the Project site. Former USTs on site were removed in 1997. As previously discussed, the Phase I ESA identified two hydraulic lifts on-site as recognized environmental conditions (RECs), which refer to the presence of hazardous substances in, on, or at the Project site due to a release or potential release into the environment. The southern hydraulic lift was reported to have had a leak for many years, and a fuel dispenser island was leftover from one of the removed USTs. A subsequent Phase II Subsurface Investigation Report tested soil samples to evaluate the potential impacts of petroleum hydrocarbons and fuel-related VOCs from a release from these conditions. None of the samples tested contained concentrations of TPH-cc and VOCs exceeding regulatory guidelines. It was concluded there was no release of environmental concern in the area. During construction operations, a Soil Management Plan is recommended to protect workers in case subsurface areas of concern are identified during redevelopment. Impacts would be less than significant in regards to the subsurface release of hazardous materials into the environment.

Development on the Project site began in the 1930s with several residential structures, and in 1975 a commercial structure was built. Between 1985 and 89 more commercial buildings were built and expanded. However, in 2022 the structures were demolished and materials removed from the site. Due to the age of the demolished buildings, there may still be asbestos-containing materials (ACMs) and/or lead-based paints (LBPs). These are considered Business Environmental Risks (BERs) and sampling of possible ACMs and LBPs will need to be done on any remaining demolition materials onsite prior to grading. Other BERs identified on the Project site include oil spillage in former auto-maintenance areas, four septic tanks systems, and a potential concrete sump. Oil stained soils should be disposed of if encountered, the sump and septic tanks removed and abandoned with regard to local requirements. Impacts to the public through the accidental release of hazardous materials would be less than significant with diligent sampling and removal methods taken.

c) **Less than Significant with Mitigation Incorporated.** There are no public or private Kindergarten through 12th grade schools within a quarter mile of the Project site. The closest public school to the Project site is the Landershim Elementary School located 1.2 miles to the southeast. The Highland Headstart facility is a private child daycare center located at the southwest corner of 5th Street and Central Avenue. However, the facility has an outdoor playground area enclosed in fencing on the property. The Headstart property is a pre-school and located 850 feet west of the Project site. There are no public or private schools or educational facilities within a quarter mile of the Project site, but there is one pre-school facility within a quarter mile of the site. Based on the preceding analysis, the Project does not represent a significant health risk or hazard to the pre-school facility or program with implementation of **Mitigation Measure HAZ-1** outlined in Section 4.9(a). Therefore, impacts will be reduced to less than significant levels with implementation of the recommended mitigation.

d) **No Impact.** The proposed Project site is not located on a site listed on the state *Cortese List*, a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses.²⁵ Based upon review of the *Cortese List*, the Project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),²⁶
- listed as a leaking underground storage tank (LUST) site by the State Water Resources Control Board (SWRCB),²⁷
- listed as a hazardous solid waste disposal site by the SWRCB,²⁸
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,²⁹ or
- developed with a hazardous waste facility subject to corrective action by the DTSC.³⁰

The Project site is not on any governmental databases associated with the Cortese List so there will be no impact and no mitigation is required.

e) **Less than Significant Impact.** The Project site is located about a mile from the northeastern corner of a runway of the San Bernardino International Airport (SBIA). The airport is located on the former Norton Air Force Base, outside of the City of Highland in the City of San Bernardino. The SBIA is used mostly for cargo shipment although passenger flights have recently started at the airport. The next closest airport is Redlands Municipal Airport located approximately 6.3 miles southeast of the Project site.

Highland has no direct authority over nearby airports, and as such, plans and regulations created by local, state, and federal airport authorities inform land use planning in Highland. San Bernardino County has delegated each airport proprietor to create individual Airport Land Use Compatibility Plans, rather than establish an Airport Land Use Commission. The San Bernardino International Airport Authority (SBIAA) is a State-created authority that serves as the owner, developer, and operator of that airport's aviation functions.

The Project site is zoned as Business Park (BP) allowing for light industrial uses, wholesaling, and/or warehousing in an enclosed building. The 5th Street Corridor is zoned for BP uses specifically because of its proximity to the SBIA, and its potential to create business and employment opportunities. The Project site will be developed and operated in cooperation with the SBIAA, and will not encroach on airport property. The Project site is outside of the SBIAA noise contour maps and will not expose persons residing or working in the Project area to excessive airport safety hazards.

The proposed Project will adhere to Highland's Municipal Code, Chapter 8.50 Noise Control and Title 16 Land Use and Development. The Project site lies within the 65dB Community Noise Equivalent Level noise contour of the airport and will not exceed the CNEL range from 65 to 70 dB, the level of noise acceptable for people in the vicinity of an airport as set by California's Airport Noise Regulations.

The proposed Project will adhere to noise and safety policies set in the Highland's General Plan Airport and Noise Elements. The warehouse building is proposed to exceed the City's height requirements for the Business Park zone (48 vs. 35 feet), so a major variance for construction is included in the requested entitlements from the City of Highland. The FAA has already issued a "No Effect" letter for the Project indicating it will not result in safety risks to the airport. In addition, the Noise Report indicates the Project can meet the City's indoor and outdoor noise guidelines with standard methods of industrial building

construction (Appendix G). Therefore, the Project will not pose an increased safety hazard or create an abundance of noise that is not acceptable for areas in proximity to an airport. Therefore, any impacts will be less than significant and no mitigation is required.

f) **Less than Significant Impact.** Per California Fire and Building Codes, sufficient space will have to be provided around the buildings for emergency personnel and equipment access and emergency evacuation. The Project includes 10-foot landscaping setbacks and 20-foot building setbacks around the parking stalls and proposed building so as not to interfere with emergency access to and evacuation from the facility. Construction operations conducted at the Project site will not significantly impede the flow of traffic on major evacuation routes in and around the City of Highland, which include Highways 10, 210, and 215. The Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the Project would be limited to a nominal potential traffic diversion. Project impacts would be less than significant and no mitigation is required.

g) **Less than Significant Impact.** The Project Site is not located within or near any State Responsibility Areas³¹ or other wildland areas. The nearest such area is located east outside of the City of Highland. Any potential impacts related to wildland fire would be less than significant and no mitigation is required.

4.10 – Hydrology and Water Quality

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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?	☐	☐	☒	☐

A Preliminary Water Quality Management Plan³² (*WQMP*) was prepared for the Project by Kier + Wright Engineers dated February 27, 2023 (**Appendix F**).

a) **Less than Significant Impact.** The Project site is zoned as Business Park (BP), meant for light industrial development, warehousing, wholesaling, and other commercial or manufacturing purposes. By their nature, these kind of facilities require a significant amount of parking, truck-staging and vehicle circulation, in addition to the building facilities themselves. This in turn increases the amount of impermeable surfaces and the amount of flows into storm drains, even with the addition of landscaping coverage around the Project site.

The Project site is currently vacant but was previously developed and used for light manufacturing and equipment storage. The Project includes the construction of a warehouse building and associated parking and landscape improvements. A Water Quality Management Plan (*WQMP*) was prepared to comply with the requirements of the City of Highland and the NPDES Areawide Stormwater Program. Five distinct drainage areas were identified on the Project site. Two drainage areas, on the west and east sides of the building along 3rd Street, direct surface flows to inlets, where runoff is collected in an underground stormwater drainage pipeline, and moved to two (2) underground infiltration systems, the larger system (#1) on the north and the smaller system (#2) on the west. Storms, where runoff exceeds the capacity of these infiltration systems, will be directed to a new connected 3rd Street storm drain line. In addition, hydrodynamic separators are proposed as pre-treatment Best Management Practices (BMPs), located upstream of the underground infiltration systems. The City has a standard Condition of Approval requiring the Project to prepare and comply with a *WQMP* approved by the City. According to the NPDES Areawide Stormwater Program, a project's compliance with the *WQMP* helps assure that project will not result in significant regional water quality impacts or violate any water quality standard or discharge requirements.

The *WQMP* also requires non-structural and structural source control Best Management Practices (BMPs) to be incorporated to reduce pollution from the Project. Non-structural BMPs to be incorporated into the Project include, but are not limited to: education of property owners, tenants, and occupants on contents of *WQMP*; activity restrictions; irrigation and pesticide management BMPs; BMP maintenance; a site-specific Spill Contingency Plan; compliance with Local Water Quality Ordinances; a litter/debris control program; drainage facilities inspected, cleaned, and maintained annually; and loading docks, driveways, and parking lots regularly cleaned and swept. Structural BMPs to be incorporated into the Project include: storm drain system stenciling and signage; construction of outdoor trash and waste storage areas; efficient landscape design and irrigation systems; landscaped areas at a minimum of 1 inch below the curb, sidewalk, or pavement; and dock areas maintained and swept. All BMPs included as part of the Project *WQMP* are required to be maintained through regular scheduled inspection and maintenance.

The Project is also subject to preventative low-impact development (LID) site design requirements. Design features intended to comply with these requirements will include disconnecting impervious areas, preserving existing drainage patterns, maximizing the natural infiltration capacity, and prohibiting heavy construction vehicles from unnecessary soil compaction.

The Project will be required to adhere to all Santa Ana Regional Water Quality Control Board (SARWQCB) permitting requirements for construction and NPDES standards for stormwater runoff. With adherence to SARWQCB permitting requirements and NPDES standards, implementation of non-structural and structural BMPs, and adherence to LID design requirements, impacts to water quality standards or waste discharge requirements will be less than significant.

b) Less than Significant Impact.

Free water was not found beneath the Project and any subsurface waters were determined to be at a depth in excess of 35 feet. The nearest monitoring well is located approximately 2,000 feet southeast of the Project site. Readings indicate a high of 52 feet below the ground's surface in October 1984. The most recent reading available via the Geotracker website was from June 2016 which showed a depth to groundwater of approximately 220 feet below ground surface with an inferred flow direction to the south. The low water tables recorded indicate the Project will have a less than significant impact on groundwater supplies.

There is a nearby former landfill site in the northeast corner of the San Bernardino International Airport property is currently overseen by the Department of Toxic Substances Control and the SARWQCB. No disturbance of groundwater is anticipated from the former landfill site or from grading of the Project site. The proposed building footprint and pavement area would increase impervious surface coverage on the site, thereby reducing the total amount of infiltration onsite. However, the proposed Project will have two infiltration systems installed on site, southeast and southwest of the building. The bottoms of these sites will be approximately 10 to 12 feet below the existing site grades and at least 25 feet away from the building and any retaining walls. The Project site is not utilized for groundwater recharge and will include landscaping that will contribute to allow infiltration of surface runoff. The updated infiltration and landscaping will be beneficial. Therefore, development of the Project site will have a less than significant impact on the groundwater table level.

c.i) Less than Significant Impact. According to the City of Highland General Plan, Conservation and Open Space Element, the City lies at the base of several regional watersheds, notably the Santa Ana River watershed, with the river located approximately 1.5 miles south of the Project site. However, the river and its tributaries do not intersect the Project site. Further, the Project will not result in the significant alteration of drainages and drainage patterns, as existing onsite drainage facilities will be regularly maintained as stated previously. Proper maintenance of drainage facilities will decrease the likelihood of erosion of sensitive stream habitats, and as such any impacts to streams or rivers near the Project site will be less than significant.

c.ii) Less than Significant Impact. No streams traverse the Project site so the Project would not result in the alteration of any stream course. During construction, the Project applicant would be required to comply with drainage and runoff guidelines pursuant to Highland Municipal Code Chapter 16.64.070. With regard to Project operation, construction would increase the net area of impermeable surfaces on the site; therefore, increased discharges to the City's existing storm drain system may occur. Surface runoff associated with the proposed development would be collected on site through multiple drainage areas and infiltration systems, and conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The Project site is vacant but zoned Business Park which allows light industrial uses and as a result could increase pollutants entering drainage systems. Pre-treatment BMPs are proposed for two drainage facilities on-site, as well as general non-structural and structural BMPs throughout the Project site, which will assist in protecting downstream water quality. Compliance with local drainage guidelines and implementation of pollutant-related BMPs would make any impacts less than significant.

c.iii) Less than Significant Impact. Development of the proposed Project would increase the net area of impermeable surfaces on the site; therefore, increased discharges to the City's existing storm drain system may occur. Runoff will be collected through multiple drainage areas would be collected on site and conveyed to two on-site infiltration system basins and then conveyed to the City's storm drainage system. All drainage plans are subject to City review and approval. The proposed Project is zoned for business park (light industrial) use and could result in substantial pollutant loading. Non-structural and

structural BMPs are required to be incorporated to protect downstream water quality. With proper maintenance of drainage facilities and adherence to BMPs, impacts would be less than significant.

c.iv) **No Impact.** According to flood maps prepared by the Federal Emergency Management Agency (FEMA), the Project site is located in an area designated “Other Flood Area, Zone X”; which is an area encompassing the following criteria: 0.2% annual chance flood; area of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and an area protected by levees from 1% annual chance flood. The Project site is in an area of minimal flood hazard, and will not impede or redirect flood flows. No impacts will occur.

d) **No Impact.** The City is not exposed to tsunami hazards due to its inland location. In addition, according to Figure 6-5 in the Public Health and Safety Element of Highland’s General Plan, most of the City is within the dam inundation area of the Seven Oaks Dam. However, the Project site is not located in the dam inundation area, and is located in a 500-year floodplain. As previously stated, according to FEMA, the Project site is in an area of minimal flood hazard. No impacts will occur.

e) **Less than Significant Impact.** The SARWQCB Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Development of the proposed Project will be required to adhere to requirements of the Basin Plan. This includes the incorporation of best management practices (BMPs) to protect water quality during construction and operational periods. Per the preliminary WQMP, the proposed Project is required to implement non-structural and structural BMPs to reduce runoff and pollutants entering waterways. Development of the Project site would be subject to all existing water quality regulations and programs, including all applicable construction permits. Existing General Plan policies related to groundwater quality are applicable to the Project. The Conservation and Open Space Element includes policies that would limit potential water quality impacts to surface water and groundwater resources. Implementation of General Plan policies, adherence to the Storm Water Quality Management Plan, and the Regional Basin Plan, would ensure that water quality impacts related to the proposed Project would be less than significant.

4.11 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a) **No Impact.** The Project site is comprised of nine rectangular parcels which until recently were used for various light-industrial or manufacturing uses including, but not limited to, equipment storage, truck parking facilities, single-family residences, and some vacant parcels. The existing uses were demolished in December 2022 and the site is currently vacant. The Project site is surrounded by commercial, industrial, and transportation-related land uses, and will not include the reconfiguration of

existing roadways or streets. Prior to demolition there were several non-conforming single family residences on the site. However, development of the Project will not divide an established community so no impacts will occur.

b) **No Impact.** The Project site is designated for Business Park uses in the General Plan Land Use Element. The proposed Project is located within the City of Highland with the Zoning designation of Business Park (BP). The site is surrounded by light industrial and outdoor storage yards so the proposed warehouse Project would not conflict with existing land uses.

The Project site and surrounding area are zoned as Business Park (BP) which has a height limit of 35 feet. The proposed warehouse will have a finished height of 48 feet which exceeds the established zone height limit. However, the City approved a City-wide Variance Process that allows a maximum height of 50 feet for warehouses¹. The Project is requesting such a variance but the increased height will not have a significant impact on public views of the local mountains as outlined in Section 4.1, *Aesthetics*.

The site is not located in a specific plan area, and does not conflict with any other land use plan, policy or regulation of any agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. No impact will occur.

4.12 – Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) **Less Than Significant Impact.** According to the City's General Plan, there are 6,052 acres in Highland classified as MRZ-2, indicating that significant mineral deposits are likely to be present. Of this, 2,345 acres of this remain undeveloped. Minerals in Highland are consist mostly of iron, decorative rocks, clay, limestone, sand and gravel. Mineral resources in Highland have been classified as significant by the State Geologist and San Bernardino County. Per the City's General Plan, extraction of minerals is limited to areas where they naturally occur, and those same areas can support new developments. Mineral resource extractions are often ignored in favor of development, as such operations leave scars on the land and produces various forms of pollution to the environment and surrounding community. The Project site is currently vacant but located in an urbanized area of Highland, with various kinds of non-residential developments on and surrounding the property. Following Mineral Resource policies in the City General Plan, the proposed Project will have a less than significant impact on mineral resources available to the City.

b) **Less than Significant Impact.** Mineral resources found in Highland have been deemed significant to the San Bernardino region. The Project site is located in an area designated as a Mineral Resource Zone, MRZ-2, which are areas of which significant mineral deposits are likely to be present. However, the area is zoned Business Park (BP) meant for light industrial uses related to warehousing, wholesaling, and some manufacturing uses. The area is highly urbanized, and is surrounded by areas that would not support the development of mining operations and the subsequent increase in mining related pollution. While development of the Project site would limit the ability of the City to extract mineral resources from the site, the loss would be less than significant to the City.

4.13 – Noise

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

A *Noise Impact Analysis Report*³³ was prepared by MIG, Inc. dated June 8, 2023 to evaluate and document noise levels associated with construction and operation of the proposed industrial warehouse (NIAR, ee Appendix G). The information in this section is taken from the NIAR for the proposed Project. Additional details regarding how noise is defined and measured can be found in Appendix D. The NIAR measured ambient and predicted future noise levels at several short-term (ST) and long-term (LT) locations around the Project site (see Exhibit 4.13-1, *Noise Monitoring Locations*).

Ambient Noise Levels. The NAIR measured ambient noise levels at and near the Project site and found them to be consistently above 62 dBA L_{eq} during the daytime and evening hours, and above 55 dBA during nighttime hours. Measured noise levels were higher along East 3rd Street (ST-3, ST-4) than West 5th Street (LT-1, ST-1, ST-2, and ST-6) due to higher traffic volumes. The 24-hour noise exposure level at LT-1 was 68.4 dBA CNEL, which is generally consistent with future traffic volumes predicted along West 5th Street in the City's General Plan. Based on observations during the monitoring, vehicle traffic



Exhibit 4.13-1 Noise Monitoring Locations

CHIPT Highland East Warehouse Building and Office Space
Highland, California

This Page Intentionally Left Blank

on West 5th Street and East 3rd Street was the predominant noise source near the Project site, with industrial and commercial land use activities and occasional aircraft overflights also contributing to the noise environment.

Sensitive Receptors. Noise-sensitive land uses and receptors are buildings or areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. The City's General Plan identifies that the City considers residential dwellings and institutional uses such as hospitals, convalescent homes, and churches to be sensitive noise receptors and requires that activities conducted in proximity to these facilities must consider the noise output and ensure they don't create unacceptable noise levels that may unduly affect noise-sensitive uses (City of Highland, 2006, p. 7-4). The noise-sensitive receptors near the proposed Project site include:

- Single- and multi-family residences located to the north (across West 5th Street and on Meines Street):
 - The closest single-family receptor is located approximately 110 feet north of the Project site, across West 5th Street. The closest single-family residential receptors on Meines Street is located 310 feet north of the Project site. Each of these receptors is located on land zoned and designated by the City for industrial uses and, therefore, are non-conforming residential uses.
 - The closest multi-family residential receptor is located 950 feet northwest of the Project site, across the intersection of Central Avenue and West 5th Street.
- Institutional uses located to the north (across West 5th Street) and west (across Central Avenue) of the site, including:
 - Highland Head Start Preschool located approximately 765 feet west of the Project site across Central Avenue.

San J. Racadio Library and Environmental Learning Center located approximately 900 feet northwest of the Project site. Exhibit 4.13-1, *Noise Receptor Locations*, shows the locations of the various sensitive receptors around the Project site that were used to estimate noise impacts from Project construction and operation.

a) **Less than Significant with Mitigation Incorporated.** The applicant anticipates the construction of the proposed Project could begin as early as the 3rd quarter of 2023 and take approximately 13 months to complete. The development of the approximately 11.09-acre site and the construction of the approximately 243,323 square feet industrial warehouse building would require site preparation, grading, trenching, building construction, paving, and architectural coating phases/activities. Soil would be balanced on site. The proposed Project is anticipated to require varying types of equipment throughout the different construction phases including, but not limited to, bulldozers, backhoes, loaders, graders, cranes, and forklifts. Table 4.13-1, *Construction Activities*, summarizes the proposed Project's construction phasing and the typical pieces of heavy-duty, off-road construction equipment that could be used during each phase.

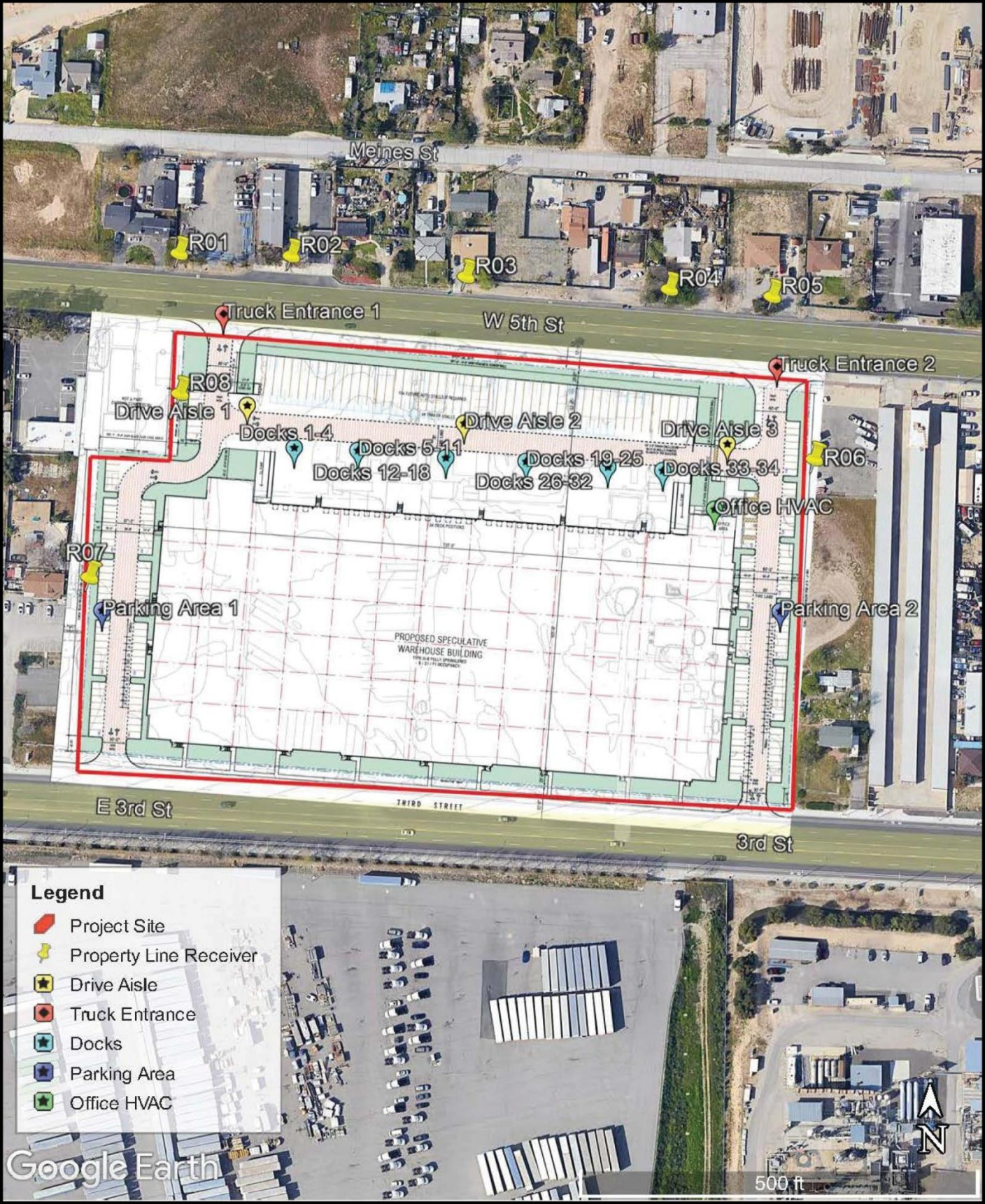


Exhibit 4.13-2 Operational Noise Receptor Locations

This Page Intentionally Left Blank

**Table 4.13-12
Construction Activities**

Construction Activity	Duration (Days)^(A)	Typical Equipment Used^(B)
Site Preparation	20	Dozer, Tractor/Loader/Backhoe
Grading	20	Excavator, Grader, Dozer, Backhoe
Trenching	60	Trencher, Backhoe
Building Construction	140	Crane, Forklift, Generator, Backhoe, Welder
Paving	10	Paver, Roller, Paving Equipment
Architectural Coating	25	Air Compressor
Source: Table 2-3, MIG 2023 (Appendix G)		
1 Days refers to total active workdays in the construction phase, not calendar days.		
2 The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each workday.		

Construction Impacts

Construction of the proposed Project would generate noise from heavy equipment operations throughout the Project area. Some heavy equipment would consist of mobile equipment such as a loader, excavator, etc., that would move around work areas; other equipment would consist of stationary equipment (e.g., generators, air compressors) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources such as back-up alarms. Mobile equipment generally operates at different loads or power outputs, and produces higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level. Construction of the proposed Project would also generate noise from vehicle trips, including worker, vendor, and haul truck trips. These trips would occur on the roads that provide access to the Project site, primarily North Perris Boulevard and East Rider Street.

The NIAR estimated the proposed Project's short-term construction-related noise levels using project-specific information and standard noise estimation methodologies recommended by the California Department of Transportation (Caltrans), the Federal Highway Administration (FHWA), and the Federal Transportation Administration (FTA). The results of this modeling, and a discussion regarding the significance of the Project's construction noise and vibration levels, are provided below. Table 4.13-2, *Construction Noise Impacts*, summarizes modeled construction equipment noise levels at residential and non-residential Receptors (R#) in the vicinity of the Project site for each anticipated Project construction activity.

**Table 4.13-13
Construction Noise Impacts**

Construction Activity	Days	Estimated Noise Level (dBA L _{eq}) ¹										
		R01	R02	R03	R04	R05	R06	R07	R08	R09	R10	R11
Site Preparation (Worst Case)	3	78.2	78.2	77.8	77.4	77.1	77.1	77.1	77.1	88.1	83.4	81.5
Site Preparation (Typical)	20	66.0	69.2	71.2	71.8	69.9	67.8	65.8	64.6	65.1	65.0	66.4
Grading (Worst Case)	3	81.8	81.8	81.5	81.1	80.7	80.7	80.7	80.7	91.8	87.1	85.2
Grading (Typical)	20	69.7	72.8	74.9	75.4	73.6	71.4	69.5	68.3	68.8	68.7	70.1
Trenching (Typical)	60	67.8	70.6	72.2	72.0	70.2	68.0	68.0	68.0	82.2	72.5	71.7
Building Construction	140	66.7	68.7	69.9	70.0	69.0	67.7	68.0	67.8	78.3	71.5	71.2
Paving (Worst Case)	10	60.1	62.9	64.5	64.3	62.5	60.3	60.3	60.3	74.5	64.8	64.0
Architectural Coating (Typical)	25	53.8	55.7	56.9	57.0	56.1	54.7	55.0	54.8	65.4	58.6	58.3

Source: Table 5-5, MIG 2023 (Appendix G)

¹ **Receptor Locations shown in Exhibit 4.13-2.** Worst case distances are measured between the Project property line and the receptor property line. Typical distances are measured between the center of the site (site preparation and grading) or the east and west parts of the site (trenching, building foundations, building construction, building MEP, and architectural coating) and the receptor property line or building façade.

As shown in Table 4.13-2, the Project's construction noise levels could reach up to 81.8 dBA L_{eq} at residential receptors, and 91.8 dBA L_{eq} at adjacent commercial receptor locations:

- **Residential Receptors (R01, R03, R04, R05, R06, R07, R08):** The modeled worst-case construction noise level at any residential receptor location would be 81.8 dBA L_{eq}. This would occur at the residence located northwest of the Project site (R01), across West 5th Street, during the Project's grading phase. During typical construction periods, construction noise levels would not exceed 76 dBA at any residence on West 5th Street. The estimated temporary increase in daytime noise levels at residential receptor locations could temporarily, under worst-case conditions, be approximately 9.0 dBA L_{eq} to 16.6 dBA L_{eq} with the highest increases occurring at R01 during the grading phase and the lowest increases occurring at R05 to R09 during the site preparation phase. Under typical conditions, the temporary increase in daytime noise levels at residential receptors could range from less than 1.0 dBA L_{eq} during the architectural coating phase to approximately 10.2 dBA L_{eq} during the grading phase.
- **Commercial Receptors (R02, R09, R10, R11):** The modeled worst-case construction noise level at any commercial receptor would be 91.8 dBA L_{eq}. This would occur at the Third Street Tavern adjacent to the Project site (R09) during the Project's grading phase. During typical construction periods, construction noise levels would not exceed 72 dBA at the adjacent crematory (R10) or air conditioning contractor (R11), 79 dBA at the adjacent tavern (R09), and 73 dBA at the drywall contractor across West 5th Street (R02). The estimated temporary increase in daytime noise levels at commercial receptor locations could temporarily, under worst-case conditions, be approximately 8.0 dBA L_{eq} to 32.9 dBA L_{eq} with the highest increases occurring at the tavern (R09). Under typical conditions, the temporary increase in daytime noise levels could range from less than 1.0 dBA L_{eq} during architectural coating to 13.1 dBA L_{eq} during

building construction. Commercial receptors are not considered sensitive receptors because they lack sensitive outdoor use areas where occupants could be exposed to construction noise levels.

The noise level estimates summarized above are based on peak equipment usage during each construction phase. As construction progresses within each phase, less equipment is usually required to perform activities and, therefore, less equipment noise is generated.

The City's Municipal Code does not establish numeric standards for construction noise levels (e.g., 90 dBA L_{eq}). Construction activities are exempt from the City's noise standards (Section 8.50.060.L) but are limited to the hours of 7 AM to 6 PM Monday thru Saturday by the City's General Plan (Goal 7.3, Action 1), with no construction activities performed during city or federal observed holidays (Section 15.48.020.A). Potential construction noise level increases at the sensitive residential land uses, when compared to the existing ambient noise environment, could range from less than 1.0 to up to 16.6 dBA higher than existing conditions, depending on the construction activities undertaken. This temporary increase in daytime exterior noise levels would represent an approximate doubling to tripling of perceived loudness at sensitive receptor locations for a short duration (i.e., site preparation, grading, and paving activities would last approximately 3 months out of the Project's 12-month long construction schedule). The proposed Project would comply with the City Municipal Code's permissible construction activity time period requirements and would not result in prolonged temporary construction noise levels that exceed an applicable standard. This impact would be less than significant.

To further reduce the Project's less than significant construction noise levels, and to reduce the potential for construction activities to interfere or annoy adjacent receptors or otherwise result in a nuisance, **Mitigation Measures NOI-1 through NOI-3** are recommended so the Project will incorporate the most appropriate Best Management Practices to control potential construction noise levels and to help assure potential noise impacts on surrounding uses will remain at less than significant levels.

Mitigation Measures

- NOI-1 Notify Adjacent Land Use of Construction Activities.** During all construction-related activities, the applicant and/or its designated contractor, contractor's representatives, and all other appropriate personnel shall notify adjacent land uses of planned construction activities. This notice shall be provided at least one week prior to the start of any construction activities, describe the construction noise control best management practices to be implemented by the Project, and include the name and phone number of a designated contact for the Applicant and the City of Highland responsible for handling construction-related noise complaints. This notice shall be provided to the owner/occupants of all occupied properties within 250 feet of the Project site.
- NOI-2 Restrict Work Hours/Equipment Noise.** All work shall be subject to the requirements in City Code Section 15.48.020.A and General Plan Goal 7.3, Action 1. Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 6:00 PM, Monday through Saturday. Construction activities shall be prohibited on Sundays and City- and Federal-observed holidays. The applicant and/or its contractor shall post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.
- NOI-3 Construction Equipment Restrictions.** The following measures shall apply during all of the construction-related activities:

- Contractors shall use the smallest size equipment capable of safely completing work activities.
- Construction staging shall occur as far away from the residential properties on West 5th Street as possible.
- All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be located as far from the residential properties on West 5th Street as possible.
- Heavy equipment engines shall be covered, and exhaust pipes shall include a muffler in good working condition.
- Pneumatic tools shall include a noise suppression device on the compressed air exhaust.
- The Applicant and/or his contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators. This measure shall be subject to the approval of the local electric utility.
- No radios or other amplified sound devices shall be audible beyond the property line of the construction site.

Operational Impacts

For the purposes of this analysis, the Project's noise sources (HVAC units, parking areas, drive aisles, and truck dock bays) were treated as stationary noise sources. Although the noise generated from parking areas, drive aisles, and truck dock bays is primarily generated by cars and trucks (mobile sources) and not truly stationary sources, this analysis conservatively compares noise from these sources against the City's exterior stationary source noise standards because noise from these areas would generally come from a fixed location (e.g., an idling truck, a parked car, etc.). In addition, it is assumed that all on-site travel would occur at slow speed (15 mph or less), and due to the short distance traveled on-site (as little as approximately 200 feet to some dock locations), on-site truck travel would be similar to a stationary source (as compared to a trucks travelling on West 5th Street or East 3rd Street). Project noise levels were estimated at eight (8) representative property line receptor locations (R01-R08) surrounding the site, as shown in Exhibit 4.13-2. Only Project noise sources within 700 feet of a noise receptor that had a direct line of sight to the receptor were included in the noise prediction estimates. The following discusses the key assumptions made to estimate potential Project noise levels at noise receptor locations:

- *Truck entrances:* Truck entrances would be located on West 5th Street. Truck entrances include truck turns into and out of the facility and are assumed to produce an average hourly noise level of approximately 71.4 dBA at a distance of 3 feet.
- *On-site passenger car parking:* Parking areas were assumed to require vehicle travel/maneuvering, doors closing, and engine start/revving activities that would produce an average hourly noise level of approximately 64.9 dBA at a distance of 3 feet. Only parking areas with a potential direct line of sight to receptor locations were evaluated. Parking areas were assumed to be fully occupied.
- *On-site truck travel:* Each on-site truck trip was assumed to travel at low speed (no more than 15 mph) and produce an average hourly noise level of 75.2 dBA at a distance of 3 feet. Truck travel lanes would include the West 5th Street driveways. The amount of peak on-site truck travel activity (seven (7) total trips in the peak hour periods) was determined from the Project's Trip Generation Assessment (Urban Crossroads, 2023).

- **On-site truck maneuvering and idling and cargo management:** Loading dock areas were assumed to require truck travel and maneuvering, back-up alarms, air brake release, and other related activities that would produce an average hourly noise level of approximately 87.9 dBA at a distance of 3 feet. Dock areas would face towards residential receptors, which would have property lines located at least 240 feet to the north of the docks. Dock areas would be located approximately 180 feet from adjacent commercial property lines to the northwest. The docks would not have a direct line of sight to most receptors due to an 8-foot-tall screening wall surrounding the dock. Each dock area was assumed to be occupied by one (1) truck each hour. The 8-foot-tall concrete screening wall was assumed to provide 0 dBA of attenuation/no screening (for R06 and R08), 6.6 dBA of attenuation (for R01, R02, and R03), or 5 dBA of attenuation (for R04 and R05).
- **HVAC units:** HVAC units were assumed to operate for 40 minutes of each hour and produce an average hourly noise level of 71.4 dBA at a distance of 3 feet. HVAC units would be located behind a parapet wall that would provide at least 5 dB of attenuation. HVAC units would be located in the center of the office space area.

The Project's stationary source, energy-averaged hourly noise levels at modeled receptor locations are summarized in Table 4.13-3, *Noise Impacts Compared to Exterior Noise Standards*.

Table 4.13-14
Noise Impacts Compared to Exterior Noise Standards

Project Noise Source	Estimated Noise Level at Receptor Property Line ¹							
	Residential Receptors					Commercial Receptors		
	R01	R02	R03	R04	R05	R06	R07	R08
Truck Entrance 1	40.1	39.7	31.3	26.0	24.2	--	40.1	29.5
Truck Entrance 2	--	24.8	28.5	35.8	40.9	32.3	--	--(A)
Drive Aisle 1	46.0	46.6	42.8	38.4	36.6	--	--	45.7
Drive Aisle 2	40.5	43.1	47.2	43.2	40.7	--	--	33.4
Drive Aisle 3	--	37.4	41.2	46.4	46.8	53.2	--	36.3
Docks 1-4	42.8	44.4	42.5	39.7	37.9	37.6	--	54.3
Docks 5 -11	41.4	43.7	43.7	40.8	38.9	38.8	--	51.3
Docks 12-18	39.5	41.7	44.4	42.8	40.7	40.7	--	48.0
Docks 19 -25	37.8	40.1	43.9	44.5	42.3	42.8	--	45.8
Docks 26 - 32	36.4	38.3	42.4	45.8	44.1	45.8	--	44.0
Docks 33 - 34	35.6	37.4	41.0	45.9	45.3	48.8	--	42.9
Parking Area 1	--	--	--	--	--	--	58.4	58.4
Parking Area 2	--	--	--	--	--	58.4	--	--
Office HVAC	--	26.7	29.7	33.2	33.4	40.2	--	25.9
Total Combined Noise Level	51.3	52.9	53.6	53.7	52.7	60.3	58.4	62.5
Exterior Daytime Standard	60	70	60	60	60	70	70	70
Exterior Nighttime Standard	55	65	55	55	55	65	65	65
Standards Exceeded?	No	No	No	No	No	No	No	No

Source: Table 5-8, MIG 2023 (Appendix G)

1 -- indicates noise source does not contribute to noise levels at the property line receptor because it is more than 700 feet away from the receptor or the receptor is shielded from the noise source by the proposed warehouse building.

As shown in Table 4.13-3, the proposed Project's stationary noise sources would not generate noise levels that exceed the City's exterior noise standards for residential or commercial land uses. Truck operations would not exceed the City's standards at residential receptor locations (to the north) because the proposed Project's truck dock bays would be set a minimum of 250 feet from residential property lines and shielded from residential receptors by an 8-foot-tall concrete screening wall. This impact would be less than significant and no mitigation is required.

Also as shown in Table 4.13-3, the maximum estimated hourly L_{eq} values at residential receptor property lines (R01, R03, R04, R05) would be 53.6 dBA L_{eq} . Typical residential-type construction achieves a minimum of 15 to 20 dBA of exterior-to-interior noise reduction, which would be sufficient to ensure the City's interior 45 CNEL standard is met inside nearby residential. The maximum estimated hourly L_{eq} values at a commercial property line (R02, R06, R07, and R08) would be 62.5 dBA L_{eq} . Typical commercial-type construction also achieves a minimum of 15 to 20 dBA of exterior-to-interior noise reduction which would be sufficient to ensure the City's interior 55 CNEL standard is met inside adjacent commercial buildings. Therefore, this impact would be less than significant and no mitigation is required.

General Plan Consistency

The Project must demonstrate compliance with the General Plan in terms of land use compatibility and exterior noise exposure. The City's General Plan Noise Element establishes 70 CNEL as the normally acceptable noise exposure limit for office land uses and 75 CNEL as the normally acceptable noise exposure limit for industrial land uses. As described in Section 4.13.a above, the 24-hour CNEL value at LT-1 was determined to be 68.4 dBA CNEL, with short-term hourly ambient noise levels in the vicinity of the site also generally near or above 65 dBA L_{eq} . The proposed Project is not a noise-sensitive land use. As warehousing land use, elevated interior noise levels are not likely to interfere with speech or other communications. Workers and customers are unlikely to expect or require quiet conditions and the site plan does not include any large outdoor open space or exterior use areas intended for respite or relaxation. For these reasons, the proposed Project would not be exposed to unacceptable exterior noise levels that exceed City General Plan noise and land use compatibility standards. Impacts will be less than significant and no mitigation is required.

Part 2, California Building Code, Section 1206.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room. In addition, Chapter 5 of the California Green Building Standards Code sets forth that buildings exposed to a noise level of 65 CNEL (where noise contours are available) or 65 dBA L_{eq} (1-hour where noise levels are not available) shall: 1) have exterior wall and roof-ceiling assemblies exposed to the noise source that meeting a composite STC rating of at least 50 (or a composite OITC) rating no less than 40, with exterior windows of a minimum STC of 40 or OITC 30 (Section 5.507.4.1); or 2) provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA L_{eq} in occupied areas during any hour of operation. In addition, County Code Section 83.01.080 (h) sets forth that warehousing areas shall be sound attenuated to meet an interior sound level of 65 dBA.

As described above, the proposed building's northern façade would be subjected to noise levels of approximately 68.4 dBA CNEL. Standard construction techniques and materials for new commercial/industrial buildings are commonly accepted to provide a minimum exterior to interior noise attenuation (i.e., reduction) of 30 to 32 dBA with all windows and doors closed, which would result in interior noise levels of approximately 38 dBA L_{eq} for occupied rooms fronting West 5th Street or East 3rd Street. Thus, with standard construction techniques, the proposed Project would satisfy interior building code noise requirements.

The Project must also demonstrate compliance with the City's General Plan Noise Element, as shown in Table 4.13-4, *General Plan Noise Element Consistency*.

**Table 4.13-15
General Plan Noise Element Consistency**

General Plan Noise Element Goal/Policy	Consistency Analysis
Goal 7.1: Protect sensitive land uses and citizens of Highland from annoying and excessive noise through diligent planning and regulation.	
Policy 1: Enforce the City's Noise Control Ordinance consistent with health and quality of life goals and employ effective techniques of noise abatement through such means as a noise ordinance, building codes and subdivision and zoning regulations.	Consistent. As discussed above in Section 4.13.a, the proposed Project would not generate noise levels that exceed the City's exterior or interior noise standards.
Policy 2: Encourage the use of site planning and architectural techniques such as alternative building orientation and walls combined with landscaping to mitigate noise to levels consistent with interior and exterior noise standards.	Consistent. The proposed Project's truck dock bays would be along the northern perimeter of the warehouse building, behind 8-foot-tall concrete screening walls. The building would screen the docks from shared commercial property lines, and the concrete walls would screen docks from shared commercial property lines and residential uses to the north (across West 5 th Street).
Policy 4: Consider the compatibility of proposed land uses with the noise environment when preparing, revising or reviewing development proposals.	Consistent. As discussed in Section 4.13.a, the Project is not a noise-sensitive land use and would be located in an area that meets the City's 75 CNEL normally acceptable noise and land use compatibility limit for industrial land uses.
Policy 7: Require that site-specific noise studies be conducted by a qualified acoustic consultant utilizing acceptable methodologies while reviewing the development of sensitive land uses or development that has the potential to impact sensitive land uses. Also require a site-specific noise study if the proposed development could potentially violate the noise provisions of the General Plan or City ordinance.	Consistent. As described in Section 4.13.a of this Report, the noise impact analysis prepared for the proposed Project indicates the Project comply with applicable City standard related to noise and would not result in a significant noise impact on any noise sensitive land use.
Goal 7.2: Encourage the reduction of noise from transportation-related noise sources such as automobile and truck traffic	
Policy 3: Require that development generating increased traffic and subsequent increases in the ambient noise level adjacent to noise-sensitive land uses provide appropriate mitigation measures.	Consistent. As described in Section 4.13.a, the proposed Project would not generate a substantial increase in traffic or traffic-related noise levels on West 5 th Street or East 3 rd Street.
Goal 7.3: Protect residents from the effects of "spill over" or nuisance noise.	
Policy 2: Prohibit new industrial uses from exceeding commercial or residential stationary-source noise standards at the most proximate land uses, as appropriate. (Industrial noise may spill over to proximate industrial uses so long as the combined noise does not exceed the appropriate industrial standards.)	Consistent. As discussed in Section 4.13.a, the proposed Project would not generate noise levels that exceed the City's exterior or interior noise standards at adjacent residential or commercial land uses.

General Plan Noise Element Goal/Policy	Consistency Analysis
Policy 3: Require that construction activities employ feasible and practical techniques to minimize noise impacts on adjacent uses. Particular emphasis shall be placed on the restriction of hours in which work other than emergency work may occur	Consistent. As discussed in Section 4.13.a, the proposed Project would not result in significant construction noise impacts at any sensitive noise receptor. Best management practices are recommended for inclusion in the Project to reduce the potential for construction noise levels to annoy or interfere with adjacent land uses.
Action 1: As a condition of approval, limit non-emergency construction activities adjacent to existing noise-sensitive uses to daylight hours between 7:00 a.m. and 6:00 p.m. Discourage construction on weekends or holidays except in the case of construction proximate to schools where these operations could disturb the classroom environment	Consistent. The proposed Project would comply with the requirements in City Code Section 15.48.020.A and General Plan Goal 7.3, Action 1. Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 6:00 PM, Monday through Saturday. Construction activities shall be prohibited on Sundays and City- and Federal-observed holidays. Recommended best management practices would require the applicant and/or its contractor to post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.
Action 3: Encourage the use of portable noise barriers for heavy equipment operations performed within 100 feet of existing residences or make applicant provide evidence as to why the use of such barriers is infeasible	Consistent. As shown in Section 4.13.a, the proposed Project would not involve construction activities within 100 feet of an existing residential sensitive use area or other noise-sensitive land uses.
Source: Table 5-9, MIG 2023 (Appendix G)	

Table 4.13-4 demonstrates the Project is consistent with the goals and policies of the City General Plan relative to noise. Therefore, the preceding analysis demonstrates the Project would not generate 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. Impacts would be less than significant but **Mitigation Measures NOI-1 through NOI-3** are recommended to help assure potential noise impacts will remain at less than significant levels for surrounding land uses.

b) **Less than Significant Impact.** Project construction activities would involve the use of large equipment capable of generating ground-borne vibrations. Since Project-specific construction equipment information is not available at this time, potential construction-related vibration impacts can only be evaluated based on the typical construction activities associated with a typical business park / warehousing development. Table 4.12-5, Potential Vibration Levels, presents the estimated, worst-case vibration levels that could occur from the operation of the typical large and/or vibration-inducing construction equipment used to develop a business park / warehousing land use project. The equipment assumptions used in the NIAR are based on, and consistent with, the CalEEMod construction phasing, equipment usage, and operating schedules used to evaluate the proposed Project's potential construction air quality impacts.

**Table 4.13-16
Potential Vibration Levels**

Equipment	PPV(A) (Inches/Second) at Distance		
	25 Feet	50 Feet	100 Feet
Vibratory Roller	0.210	0.098	0.046
Large Bulldozer	0.089	0.042	0.019
Small Bulldozer	0.03	0.014	0.001
Loaded Truck	0.076	0.035	0.017
Jackhammer	0.035	0.016	0.008
Source: Table 5-4, MIG 2003 (Appendix G)			

The potential for ground-borne vibration and noise is typically greatest when vibratory or large equipment such as rollers, impact drivers, or bulldozers are in operation. For the proposed Project, these types of equipment would primarily operate during site preparation, grading, and paving work. This equipment would, at worst-case and for very limited period of times, operate adjacent to the site's property lines and within approximately 15 feet of the crematory building façade to the west of the site, approximately 25 feet of the Third Street Tavern building façade to the west of the site, approximately 55 feet to the CSR Inc contractor building façade to the west of the site, and approximately 120 feet from the closest residence to the north of the site; however, most construction activities would take place hundreds of feet away from these building locations. A summary of predicted worst-case construction vibration levels is presented in Table 4.13-6, *Construction Vibration Impacts*.

**Table 4.13-17
Construction Vibration Impacts**

Scenario / Receptor	Estimated Duration	Maximum PPV, Vibratory Roller (inches/second)	Maximum PPV, Typical Equipment (inches/second)
Worst-Case Construction (15 feet from crematory building to the west)	1 day	0.368	0.156
Worst-Case Construction (25 feet from tavern to the west)	1 day	0.210	0.089
Worst-Case Construction (55 feet from contractor building to the west)	1 day	0.088	0.037
Worst-Case Construction (120 feet from residence to the north)	1 week	0.036	0.015
Source: FTA, 2018 and Table 5-6, MIG 2023 (Appendix G)			

As shown in Table 4.13-6, the proposed Project's construction activities would have the potential to generate worst-case ground-borne vibration levels up to 0.368 in/sec Peak Particle Velocity (PPV) at non-residential buildings to the west of the site. These vibration levels are associated with the operation of a vibratory roller at the Project's western boundary. All other equipment operating along the western boundary would generate groundborne vibration levels up to 0.156 in/sec PPV. Potential typical and worst-case vibration levels at adjacent commercial buildings to the west would be above Caltrans' strongly perceptible threshold for human annoyance from continuous vibration sources (0.10 in/sec PPV), however, at no point would potential vibration levels at adjacent commercial building façades exceed Caltrans' thresholds for potential damage to modern industrial and commercial structures (0.50

in/sec PPV). Similarly, potential typical (0.015 in/sec PPV) and worst case (0.036 in/sec PPV) vibration levels at the closest residential building across West 5th Street would exceed Caltrans' slightly and distinctly perceptible thresholds for human annoyance from continuous vibration sources (0.01 in/sec PPV and 0.035 in/sec PPV, respectively) but would not exceed Caltrans' thresholds for potential damage to older residential structures (0.3 in/sec PPV).

Although construction activities could generate perceptible vibrations when work occurs adjacent to commercial structures and within approximately 120 feet of residences, these vibrations would not be excessive because they would be intermittent (lasting only a few hours each day), temporary (lasting a few days at worst), occur during the daytime (i.e., would not interfere with evening or nighttime use of residences), and would not result in physical damage to any building or structure. For these reasons, the proposed Project would not generate excessive construction-related ground-borne vibration or noise levels. This impact would be less than significant and no mitigation is required.

c) **Less than Significant Impact.** The Noise Study indicates the proposed Project is located approximately 0.4 miles north of the nearest runway associated with the San Bernardino International Airport (SBIA). An airport land use compatibility plan has not been prepared for the SBIA (City of Highland, 2006). According to the City's zoning map, the proposed Project site is located within SBIA Safety Zone D and E, which has low to negligible risk. Additionally, the City's Municipal Code (Section 16.40.410) establishes that warehouses are compatible with these safety zones and acceptable without safety-related conditions. Noise contours prepared for the Eastgate Air Cargo Facility Final Environmental Assessment indicates the southern part of the proposed Project site (the part of the site within approximately 100 feet of the right-of-way boundary for East 3rd Street) is within the airport's future 65 CNEL noise zone, which was developed assuming approximately 240 average daily and 87,617 total annual aircraft operations in 2024 (SBIAA, 2019, Table 4-21 and Figure 4-8). The remainder of the site is within the 60 CNEL contour. The Project is not a noise-sensitive land use that would be prohibited within the potential 65 CNEL noise contour associated with the SBIA. There are no outdoor uses associated with the Project in the potential 65 CNEL contour area other than parking, and standard exterior-to-interior noise attenuation would result in interior noise levels that are less 45 CNEL. Therefore, the proposed Project would not expose people working in the Project area to excessive airport-related noise levels. Impacts would be less than significant and no mitigation is required.

4.14 – Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) **Less than Significant Impact.** The Project site is designated Business Park (BP) which allows commercial and light industrial uses, and is comprised of multiple adjacent parcels. Until recently the site contained a number of buildings and outdoor areas used for equipment storage and light manufacturing. According to the SCAG 2020-2045 RTP/SCS growth estimates, the City of Highland is anticipated to see employment in the City increase from 5,500 jobs in 2012 to 10,200 jobs in 2045, an increase of 4,700 jobs. According to the Project applicant, the warehouse is anticipated to employ approximately 100 permanent full-time employees during operation.

As such, the Project would be consistent with the SCAG growth projections for the City, which are based on buildout of the City's General Plan, and will not induce substantial population growth in the area either directly or indirectly. Any population growth as a result of the Project would be offset by areas designated for housing to meet housing demands. Finally, because the Project is consistent with anticipated buildout of the City's General Plan, these impacts are not considered significant.

b) **Less Than Significant Impact.** Three single family residences were recently demolished on the Project site, but no additional housing would be displaced as a result of Project development. The Project does not provide any housing and is not located in an undeveloped area that would require a major extension of infrastructure, and as such there will be no impact.

4.15 – Public Services

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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

a) **Less than Significant Impact.** The Project is located in the service area of the City of Highland Fire Department which responds to medical emergencies, hazardous materials incidents, rescue calls, and motor-related accidents, in addition to regular fire suppression services. There are three stations in Highland: 26974 Base Line; 29507 Base Line; and 7649 Sterling Avenue, Highland, CA. 92346. The nearest Fire Station to the Project site is actually San Bernardino County Fire Station 234, on 157 W 5th Street., the nearest location in Highland is Station 541 located approximately 1 mile North of the Project site. The Project includes construction of a warehouse and associated parking and landscaping improvements. Any future tenants of the warehouses that would be storing and using hazardous materials would be required to adhere to local and state ordinances pertaining to the handling and storage of such materials. The Project is anticipated to create an incremental increase in demand for fire services. Development of the Project would include adequate fire access. In addition, Development Impact Fees that are collected at the time of building permit issuance for approved projects will offset incremental impacts of development on demand for services. Impacts related to expansion of fire protection services will be less than significant.

b) **Less than Significant Impact.** The Project is located within the service area of the San Bernardino County Sheriff, which the City of Highland contracts services from. The Highland Station is located at 26985 East Baseline Highland, CA. 92346. Approximately 1 mile north of the Project site. Development of the Project site may generate an incremental increase in the need for police protection in the Project area. However, this incremental increase is anticipated with build out of the City's General Plan. The Police Department reviews its needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Additionally, Development Impact Fees collected at the time of building permit issuance will help offset incremental impacts of development on demand for services. Therefore, a less than significant impact to police services will occur.

c) **No Impact.** The Project includes construction of a warehouse and associated parking and landscape improvements. The Project will not result in any direct population growth, or associated growth in students, within the San Bernardino City Unified School District. However, occupation of the Project could have the potential to increase demand on local school services, such as the Highland Headstart Daycare located across from the site at the southwest corner of 5th Street and Central Avenue. As most of the employees that would staff the warehouses could be reasonably expected to come from the local population, an increase of school populations is unlikely. Perhaps in the event of future increases in staffing levels, then there would be a correlated increase demand on schools. However, payment of development impact fees required under State law would offset the cost of increased demand on school district facilities in the future. No impacts on school facilities would occur.

d) **No Impact.** Development of the Project could have the potential to incrementally increase demand on parks and recreation facilities if it induced substantial population growth in the vicinity or Project employees used local parks. However, staffing of the warehouse is expected to come from the local population due to the existing vacancy rates in the City and immediate surrounding area. As such, the proposed light industrial development will not result in any direct population growth that would require expansion or acquisition of recreational facilities. No impacts will occur.

e) **No Impact.** The Project is not expected to increase the number of City residents that would generate additional demand for public facilities such as libraries or hospitals. Working conditions in industrial type workplaces can foster opportunities for injury leading to hospital visits, however, impacts related to the expansion of library facilities or hospitals would not occur as a result of the Project.

4.16 – Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a) **No Impact.** The Project includes construction of a 243,323 square foot warehouse building. Employees of the warehouse are likely to be existing residents from within or in the general vicinity of the City of Highland. As such, the Project itself would not create demand for additional parks, or other recreational activities as the workforce will be drawn from the existing population of the area and from additional housing planned by the City to accommodate anticipated buildout of the City's General Plan. Any impacts to recreational facilities would be less than significant.

b) **No Impact.** The Project does not include any recreational facilities or require the construction of new facilities, and there would not be an adverse physical effect to the environment. Therefore, there would be no impact.

4.17 – Transportation

Would the project:

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

Both a trip generation assessment and a vehicle miles traveled (VMT) screening analysis³⁴ for the proposed Project were prepared by Urban Crossroads in March 2023 (See Appendix H). The trip generation assessment was prepared in accordance with the San Bernardino County Transit Authority (SBCTA) *Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* methodology dated February 2020 (TIA Guidelines).

a) **Less than Significant Impact.** Table 4.17-1, **Project Trip Generation**, shows the estimated trip generation for the Project based upon trip generation rates obtained from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). The Project trip generation forecast is determined by multiplying the trip generation rates by the land use quantity. Based on review of ITE land use descriptions, trip generation rates for ITE Land Use Code 150-Warehousing, were determined to most closely represent the proposed Project. At the time the trip generation study was initiated (May 2022) the site was occupied by a number of light industrial and truck yard uses, however those uses were demolished and removed in December 2022. Therefore, Table 4.17-1 only shows the proposed Project trips.

The proposed Project is anticipated to generate a total of 416 two-way vehicle trips per day with 40 AM peak hour trips and 43 PM peak hour trips (in actual vehicles). In comparison, the proposed Project is anticipated to generate a total of 642 Passenger Car Equivalents (PCE) two-way trips per day with 47 PCE AM peak hour trips and 54 PCE PM peak hour trips. Table 4.17-1 also shows the Project is

anticipated to generate 642 new PCE two-way trips per day with 47 AM PCE peak hour trips and 54 PM peak hour trips in PCE.

**Table 4.17-18
Project Trip Generation**

Land Use ¹	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Passenger Cars	29	7	36	8	28	36	270
Total Truck Trips (PCE ²)	6	5	11	10	8	18	372
Total Trips	35	12	47	18	36	54	642

Source: Table 4, Urban Crossroads 2023. (See Appendix H)

¹ Project assumed to be ITE Code 150-Warehousing @248,055 SF (ITE 11th Edition, 2021)

² Passenger Car Equivalents assumes higher impacts for trucks depending on the number of axles (2-4)

Based on the anticipated net new trips, additional off-site intersection operations analysis may be required under the City's Guidelines. Since the time the Trip Generation Memo was initiated, the light industrial and residential uses on the Project site have been demolished so no "discount" has been included for eliminating vehicle trips from existing onsite uses. However, it should be noted that level of service (LOS) traffic impacts are no longer considered an environmental issue or threshold under CEQA. For that reason, any additional LOS traffic analysis would not affect this IS/MND but could still be required of the Project for planning or engineering purposes.

The trip generation analysis was also prepared to meet the VMT requirements for the City and evaluate whether the Project screens out from needing to conduct a detailed VMT analysis based on the City's guidelines. As detailed in Section 4.17.b, the proposed Project does not meet any of the three screening criteria so a detailed VMT Memo was prepared which demonstrated the Project will have a less than significant impact on VMT with implementation of three (3) VMT Mitigation Measures VMT-1 through VMT-3. Therefore, the Project will not conflict with a program plan, ordinance, or policy addressing the roadway circulation system or VMT and impacts will be less than significant.

Public Transit

San Bernardino County, including the City of Highland, is provided bus transit service by Omnitrans which maintains Route 15 in the immediate Project area. Route 15 provides service to Colton to the west and Redlands to the south. The route travels along 5th Street east of Central Avenue so it passes right by the Project site. There are several Omnitrans bus stops along 5th Street including at Central Avenue.

The proposed Project will not remove or impact any established bus stops and will not interrupt service to them during either construction or operation. The proposed Project would also not significantly increase or decrease the use of these facilities as a result of construction or operation. As such, the Project will not have an impact on transit.

Pedestrian and Bicycle Facilities

The proposed Project site is currently vacant although it contains a number of light industrial and residential uses until December 2022. There are no continuous sidewalks along either the north or south sides of 3rd Street or 5th Street in the vicinity of the Project site. However, there is a level dirt shoulder approximately ten feet in width behind the curb on the north side of 3rd Street and the south side of 5th Street where sidewalks are not provided. At some point in the future when vacant land or older developed parcels are constructed or reconstructed, these streets will eventually have continuous sidewalks. The City of Highland General Plan, Open Space and Conservation Element, indicates a multi-use trail

(including pedestrian access) will eventually be created along City Creek just north of the Project site, and a major trail node will be created southeast of the Project site near the confluence of the Santa Ana River and City Creek (per General Plan Figure 5-6, Multi-Use Trails).

At present, 3rd Street and 5th Street both have bicycle lanes striped in both directions within their rights-of-way. The Project will provide sidewalks adjacent to the site along 3rd Street and 5th Street. In addition, the proposed Project will provide bicycle parking racks (see Mitigation Measure VMT-3). Therefore, the Project will have the effect of incrementally improving pedestrian and bicycle facilities in the immediate vicinity and providing added connectivity where current facilities do not exist. As such, the Project represents an improvement over existing conditions. Impacts will be less than significant and no mitigation is required.

b) **Less than Significant with Mitigation Incorporated.** California Senate Bill 743 (SB 743) directs the State Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020.

To comply with SB 743, the San Bernardino County Transportation Authority (SBCTA) released the SBCTA Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (*SBCTA Guidelines*) that address VMT analysis requirements. At the time of this analysis, the City of Highland has yet to formally adopt VMT guidelines, however, based on consultation with City planning and engineering staff, the City has directed that on an interim basis the SBCTA Guidelines should be utilized for purposes of VMT screening steps.

The SBCTA Guidelines provide Information 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 the need to conduct a more detailed project level assessment. The SBCTA Guidelines state that a project may have a less than significant impact and screen out of requiring a project level VMT analysis if it meets at least one of the VMT screening steps. To aid in the VMT screening process the SBCTA VMT Screening Tool (*Screening Tool*) was used. The SBCTA's adopted VMT screening steps are described in **Table 4.17-2, Screening for Land Use Projects Exempt from VMT Analysis**, along with a determination of each screening step's applicability to the Project.

The VMT Memo indicated the Project is not located in a TPA or Low VMT area. In addition, the Project is not local serving and is anticipated to generate an additional 642new daily trips consistent with the Trip Generation Assessment prepared for the Project. The SBCTA Guidelines states that projects not screened through the above steps are required to complete a VMT analysis using the San Bernardino Traffic Analysis Model (SBTAM) to determine if they have a significant VMT impact.

**Table 4.17-19
Screening for Land Use Projects Exempt from VMT Analysis**

Screening Steps	Description	Project Result
1. Transit Priority Area (TPA) Screening	Projects located within a TPA (i.e., within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor) are presumed to have less than significant impact on VMT.	Project does not meet
2. Low VMT Area Screening	Projects located within a low VMT generating zone that can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area are presumed to have a less than significant VMT impact.	Project does not meet
3. Project Type Screening	Local-Serving Retail under 50,000 square feet, Local Essential Services, and projects generating less than 110 daily vehicle trips are presumed to have a less than significant impact on VMT.	Project does not meet

SBTAM VMT Analysis

SBCTA Guidelines identify San Bernardino Traffic 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 interactions between different land uses based on socio-economic data such as population, households, and employment. The SBTAM model assumes datasets consistent with the 2020 Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). SBTAM is also consistent with the model used to develop the SBCTA's VMT impact thresholds identified in their Guidelines.

City Staff directed the traffic consultant to use the VMT metric home-based work (HBW) metric of VMT per employee which measures all home-based attraction trips (employment) to/from their ultimate destination unless that destination is outside the model boundary area. City staff indicated this is the appropriate metric for an employment-generating single use project in the City of Highland. Using the metric VMT per employee, the City has chosen to utilize the following impact thresholds:

1. The baseline project generated VMT per employee exceeds the City of Highland General Plan Buildout VMT per employee, or
2. The cumulative project generated VMT per employee exceeds the City of Highland General Plan Buildout VMT per employee.

Based on VMT data previously published by the SBCTA for each of its member agencies and the San Bernardino County region, VMT per employee in the City of Highland for General Plan Buildout conditions is 15.57 VMT per employee.

In order to estimate project generated VMT, standard land use information such as building square footage must first be converted into a SBTAM compatible dataset. The SBTAM model utilizes socio-economic data (SED) (e.g., population, households, employment, etc.) instead of land use information to estimate vehicle trips. The Project's building square footage was converted into employment for input into SBTAM using employment density factors derived by the Southern California Association of

Governments (SCAG) Employment Density Study dated October 2001. The VMT Memo estimated the Project would generate 204 employeesⁱ by land use type which was then used to populate the SBTAM model to calculate the proposed Project's impacts.

As stated previously, VMT per employee is used to evaluate Project VMT. VMT per employee is derived by dividing Project generated HBW VMT by the number of estimated Project employees. HBW VMT is obtained from the SBTAM model using the Production/Attraction (PA) method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., Project's TAZ). Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). Productions and attractions are converted from person trips to vehicle trips for the purposes of calculating VMT and are then multiplied by the distance skims to calculate VMT. **Table 4.17-3, Project VMT Per Employee**, presents Project generated PA HBW VMT from the SBTAM model, along with the estimated number of Project employees, and the resulting VMT per employee.

Table 4.17-20
Project VMT Per Employee

VMT Characteristic	Baseline	Cumulative
HBW VMT	3,391	3,239
Employees	204	204
VMT Per Employee	16.62	15.88
City Threshold	15.57	15.57
Percent Above Threshold	+6.74%	+1.99%
Potentially Significant?	Yes	Yes

Source: Table 3, VMT Memo, Urban Crossroads, March 2023

As shown in Table 4.17-3, Project generated VMT per employee is above the City's VMT impact threshold by 6.74% for baseline conditions and 1.99% for cumulative conditions. The Project, at a minimum, will need to reduce its VMT impact for baseline and cumulative conditions by 218 VMT or 6.32%. However, the SBTAM model does adequately account for Project changes or actions that would result in reductions to project generated VMT. The VMT Memo recommended three design features which are intended to reduce Project VMT to less than City baseline and cumulative thresholds. These design features are incorporated into this document as **Mitigation Measures VMT-1 through VMT-3**.

With implementation of the recommended mitigation measures, Project VMT per employee values will be below the City's impact thresholds. The following section provides discussion and calculations of the potential VMT reduction of each of the recommended mitigation measures.

ⁱ Assumes 248,055 square feet of warehousing with 1,195 square feet per employee equals 208 employees

Mitigation Measures

- VMT-1 Commute Trip Reduction (CTR) Marketing Program.** The Project shall implement a marketing program to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness.
- Onsite or online commuter information services.
 - Employee transportation coordinators.
 - Onsite or online transit pass sales.
 - Guaranteed ride home service
- VMT-2 Ridesharing Program.** The Project shall provide a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. Ridesharing must be promoted through a multifaceted approach. Examples include but are not limited to the following.
- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
 - Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles.
 - Providing an app or website for coordinating rides
- VMT-3 End-of-Trip Bicycle Facilities.** The Project shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT. End-of-trip facilities should be installed at a size proportional to the number of commuting bicyclists and regularly maintained.

Mitigation Analysis and Conclusion. Under VMT-1, the Project will provide tenant's employees material and online resources as a means to promote the commute trip reduction program. The VMT Memo calculates that with proper implementation and 100% of the Project's employees eligible, this measure is expected to reduce VMT by 4%. Under VMT-2, the Project will provide carpool/vanpool/EV parking designated spaces in locations of easy and convenient accessibility to the Project building. The VMT Memo calculated that with proper implementation and 100% of the Project's employees eligible, the Project is expected to reduce VMT by 4%. For VMT-3, the Project will install building elements for bicycle trip end facilities (i.e., bicycle parking) for commuters that choose to bicycle as a mode of travel. This will promote an alternative mode choice of commuting for employees. As calculated, this measure will reduce VMT by 0.1%. As outlined through the VMT reduction calculations presented in the VMT Memo, the three recommended measures will reduce VMT by a total of 7.9%, which would bring the Project's VMT per employee to below the City's threshold, as shown in **Table 4.17-4, Adjusted Project VMT Per Employee**. Therefore, the Project's potential VMT impacts with mitigation would be reduced to less than significant levels.

Table 4.17-21
Adjusted Project VMT Per Employee

VMT Characteristic	Baseline	Cumulative
HBW VMT	3,457	3,302
Employees	208	208
VMT Per Employee	16.62	15.88
City Threshold	15.57	15.57
Adjusted VMT Per Employee after implementing VMT-1 through VMT-3	15.31 (-7.9%)	14.63 (-7.9%)
Potentially Significant? (i.e., exceeds threshold)	No	No

Source: Table 3, VMT Memo, Urban Crossroads, March 2023

c) **Less than Significant Impact.** A significant impact would occur if the proposed Project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the site will be provided via four (4) separate driveways: two passenger vehicle driveways on 5th Street (30-foot width) and two truck driveways on 3rd Street (40-foot width). Although this portion of the City is bounded on the south by the San Bernardino International Airport, the streets in this portion of the City form a grid pattern with no sharp curves, multiple-legged intersections, or sharp intersections.

The design of the proposed Project, including driveways and approaches, will comply with all applicable City regulations. Furthermore, the proposed Project does not involve changes in the alignment of any local roadway, and the proposed Project is consistent with existing uses in the vicinity of the Project site.

The operation of the Project would not significantly impact surrounding roads or create dangerous curves or intersections. During construction, the proposed Project would comply with all local regulations regarding temporary road closures or and/or one-way traffic controls. The proposed Project would not result in a traffic safety hazard due to any design features. Impacts would be less than significant.

d) **Less than Significant Impact.** A significant impact would occur if the design of the proposed Project would not satisfy emergency access requirements of the San Bernardino County Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the Project site or adjacent uses. The proposed Project would not result in inadequate emergency access. As discussed above, access to the site will be provided via four (4) separate driveways: two passenger vehicle driveways on 5th Street (30-foot width) and two truck driveways on 3rd Street (40-foot width).

The driveway width is sufficient to provide access to fire and emergency vehicles and is consistent with the California Fire Code which requires a minimum of 20 feet. In addition, the Project site plan shows a 24-foot fire access around the entire building. All access features are subject to and must satisfy the City of Highland design requirements, including the Fire Department's requirements. This Project would therefore not result in adverse impacts with regard to emergency access. Impacts will be less than significant and no mitigation is required.

4.18 – Tribal Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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 Cultural Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a.i) **Less than Significant with Mitigation Incorporated.** The Cultural Resources Assessment included a records search and site walkover which found no recorded archaeological resources on the Project site. Based on the previously disturbed conditions on the site and the urbanized nature of the Project area, there is little potential for the proposed Project to impact known archaeological resources during construction. However, regardless of negative results, there is still the possibility that resources could be unearthed during clearing and grading.

The Project site is also located in proximity to the Lytle Creek Channel which is considered a sensitive archaeological area in the City's General Plan and through consultation with the Gabrieleno Band of Mission Indians - Kizh Nation (GBMI-KN) and the Yuhaaviatam of San Manuel Nation (YSMN), formerly known as the San Manuel Band of Mission Indians (SMBMI). In order to comply with CEQA Guidelines Section 15064.5, PRC 5097.98(d)(1), the Native American Graves Protection and Repatriation Act

(NAGPRA), and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the proposed Project will incorporate **Mitigation Measures CUL-1 through CUL-15** to reduce potentially significant impacts to previously undiscovered archaeological resources to a less than significant level. These potential impacts and the recommended mitigation measures are presented in the previous Section 4.5, *Cultural Resources*. These measures were recommended by GBMI-KN and YSMN during the Native American Tribal Consultation Process outlined below. With implementation of these measures, potential impacts to tribal cultural resources will be reduced to less than significant levels.

In addition, the YSMN recommended two mitigation measures which have been incorporated into **Mitigation Measure TCR-1**. With the incorporation of the recommended mitigation, impacts to listed or eligible tribal cultural resources will be less than significant.

a.ii) **Less than Significant with Mitigation Incorporated.** California Assembly Bill (AB) 52, through its implementing regulations, requires that lead agencies consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Proposed Project and who have requested in writing to be informed by the lead agency of proposed projects in the tribe's geographic area (PRC Section 21080.3.1(b) and (d)).

Pursuant to AB 52, as the CEQA Lead Agency, the City sent AB 52 consultation notification letters via email on July 31, 2023 to the following Tribes (see Appendix C):

- Soboba Band of Luiseno Indians
- Gabrieleno Band of Mission Indians - Kizh Nation (GBMI-KN);
- Yuhaaviatam of San Manuel Nation (YSMN), formerly known as the San Manuel Band of Mission Indians;

Under AB 52 tribes have 30 days in which to indicate they wish to consult. For this project, that period ended on August 31, 2023. No correspondence was received from the Soboba Band of Luiseno Indians during that time.

On August 12, the GBMI-KN contacted the City and requested a number of mitigation measures that were subsequently incorporated into the IS/MND as CUL-1 through CUL-6 and CUL-9 through CUL-14.

On August 14, 2023 the YSMN sent an email to the City with recommended mitigation for potential impacts to cultural and tribal cultural resources. These recommendations have been incorporated into Mitigation Measures CUL-7, CUL-8, and CUL-15. The others measures (CUL-1 through CUL-6 and CUL-9 through CUL-14) are based on recommendations from the GBMI-KN (see above).

As described in Threshold 4.18.a.i above, the proposed Project will incorporate **Mitigation Measures CUL-1 through CUL-15** to reduce potentially significant impacts to previously undiscovered archaeological resources to a less than significant level. These potential impacts and the recommended mitigation measures are presented in the previous Section 4.5, *Cultural Resources*. In addition, the YSMN submitted mitigation language during their consultation process that has been incorporated into **Mitigation Measure TCR-1**.

Mitigation Measures

TCR-1 The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the 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.

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.

With the incorporation of the recommended mitigation, impacts related to Native American consultation and tribal cultural resources will be less than significant.

4.19 – Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 and 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?	☐	☐	☐	☒

a) **Less than Significant Impact.** The East Valley Water District (EVWD) delivers water to over 104,457 connections throughout its service area, including the City of Highland. This Special District receives its water from dozens of wells in the San Bernardino Basin Area (SBBA) which is managed by the San Bernardino Municipal Water District (SBMWD). EVWD's water supply consists primarily of groundwater from wells in the western portion of the EVWD service area and SBBA wells supply an estimated 80% of the total water supply. Additionally, Plant 134, an 8-MGD water treatment plant, provides surface water from the Santa Ana River and the State Water Project (SWP) to the EVWD. Seventeen (17) wells provide for 80% of the EVWD's water supply at a rated capacity of 27,586 gallons per minute (GPM).³⁵

The Project is estimated to consume approximately 6,300 gallons per day (gpd) or approximately 10 acre-feet (AF) of water per year. The EVWD had an estimated total annual demand of 31,609 total acre-feet (AF) in 2020²⁹ and a total annual supply of 43,972 AF for a difference or available capacity of 12,363 AF. Therefore, the Project water consumption represents 0.08% (10 AF divided into 12,363 AF) of the EVWD's current available capacity. Impacts would be less than significant.

Wastewater from the EVWD is treated to secondary levels at the San Bernardino Regional Wastewater Reclamation Plant and to tertiary levels at the Rapid Infiltration/Extraction (RIX) Plant.²⁹ The Project is estimated to have a wastewater generation of approximately 3,150 gallons per day (gpd)²⁹ or 0.003 million gallons per day (MGD). The EMWD's current capacity of its RIX Plant is 12 MGD so the Project represents 0.025% of the current capacity of the RIX Plant.

Local water and sewer connections to the Project site will remain intact and will not necessitate construction of new or expanded facilities in Highland. As described above in section 4.9a, new underground stormwater drainage connections and infiltration facilities will be constructed to serve the project area. As discussed in the Hydrology section, the project would not generate substantially increased runoff from new impermeable surfaces on site. As outlined in the Water Quality Management Plan, runoff from the site will be treated through two underground infiltration systems located on the north and west sides of the Project site. Runoff will be directed to proposed catch basins and conveyed to the infiltration systems under the site. No additional improvements are anticipated to either sewer lines or treatment facilities to serve the Project. Standard connection fees will address any incremental impacts of the project. Therefore, the project will result in less than significant impact as a result of new or expanded water supply and wastewater treatment facilities.

Section 4.6(a) demonstrates that Project energy impacts related to electric power and natural gas would also be less than significant. The Project will connect to existing facilities and will not require any extension of services. Therefore, the proposed industrial facility would not 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 a significant environmental effect. Less than significant impacts will occur and no mitigation is required.

b) Less than Significant Impact. According to the *San Bernardino Valley Regional 2020 Urban Water Management Plan (UWMP)*, the EVWD reported an estimated total demand of 31,609 total acre-feet (AF) in 2020.²⁹ The same estimates calculated a supply total of 43,972 AF, a difference of 12,363 AF. The project would generate a marginal increase in additional demand for water from the EVWD's wells, relative to overall existing citywide demand. Based on calculations for water use (See Air Quality Study in Appendix A), the industrial facility will use a total of approximately 2.3 million gallons of water annually, or approximately 10 acre-feet/year, which includes both indoor uses such as toilets and drinking fountains and outdoor use such as sprinklers for landscaping and parking lot upkeep. The estimate of future water demand in the *UWMP* is based on approved land uses at the time the *UWMP* was prepared. The proposed Project is consistent with the land use and zoning designations of the site, so the increased water demand of the Project has already been taken into account in the *UWMP*. The *UWMP* anticipates the overall future increase in water demand associated with development in the area over 2020 conditions, and the water demand for this Project is within that demand assumption. Therefore, the Project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies and no mitigation is required.

The Project would also be required to comply with CBC Title 24 water efficiency measures to demonstrate a 20 percent reduction in the use of potable water. The Project's landscaping plans include drought tolerant landscaping materials consistent with the City's Municipal Code (CMC) as well.

Compliance with Title 24 and the CMC will reduce the Project's impacts to groundwater supplies to a level of less than significant and no mitigation is required.

c) **Less than Significant Impact.** Potentially significant impacts could occur as a result of this Project if it results in a determination by the wastewater treatment provider (EVWD) which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. As detailed in Sections 4.19.a and 4.19.b, the Project will be adequately served by the existing RIX wastewater treatment plant which was expanded in 2020 from 8 to 12 million gallons per day (MGD) of treatment capacity. The anticipated wastewater flow from the Project is estimated to be 3,150 gallons per day or 0.003 million gallons per day (MGD) The EMWD's current capacity of its RIX Plant is 12 MGD so the Project represents 0.025% of the current capacity of the RIX Plant²⁹ , Therefore, a less than significant impact would occur.

d) **Less than Significant Impact.** Significant impacts could occur if the proposed Project would exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. Solid waste disposal services in the City of Highland are provided by Burrtec Waste Industries. Waste from Highland is primarily transferred to the Mid-Valley Landfill in nearby Rialto, CA. The Badlands Landfill is as well located in Moreno Valley in Riverside County. Burrtec operates the East Valley Transfer and Recycling center in San Bernardino, where solid waste and recyclables are separated. According to CalRecycle, the Mid-Valley Landfill has a maximum capacity of 101,300,000 tons, with a remaining capacity of 61,219,377 tons measured June, 2020. Construction of the facility is anticipated to generate some solid waste, with an estimated total waste generation of 137.58 tons per year during its operation. Warehousing facilities in Highland are estimated to generate 349 total tons of materials each year which accounts for 2.9% of Highlands annual waste tonnage generated. This tonnage includes disposal materials, recyclables, and other items. The amount of waste that is generated from similar facilities is negligible compared to that produced by other business groups in Highland.

Construction of the facility is anticipated to result in the production of some solid waste. Project operations are anticipated to generate approximately 228.7 tons of solid waste annually (AQ Report).

Therefore, because there would be adequate landfill capacity in the region to accommodate project-generated waste, and the proposed project is not expected to generate a substantial quantity of solid waste, the impact would be less than significant and no mitigation is required.

e) **No Impact.** The proposed Project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact would occur.

4.20 – Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

a) **No Impact.** The Project site is not located within or near any State Responsibility Areas (there are none in the City of Highland). There are no wildland conditions in the urbanized area where the Project site is located. The City's general plan designates Interstates 10, 15, 215, and State Routes 30, 31, 60, 66, and 71 as evacuation routes, and the Project will not interfere with the availability of these highways as evacuation routes. Therefore, the Project will not substantially impair any adopted emergency response plan or emergency evacuation plan, and no impact will occur.

b) **No Impact.** The Project site is not located within a designated fire hazard zone, as identified on the Very High Fire Hazard Severity Zone (VHFHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE). The Project site is located in a heavily urbanized area and will not exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact will occur.

c) **No Impact.** The Project site is not located within or near any State Responsibility Areas. As a result, none of the Project improvements would exacerbate fire risk or will result in a temporary or ongoing impact from wildfires requiring the installation or maintenance of associated infrastructure that may

exacerbate fire risk, or that may result in temporary or ongoing impacts to the environment. No impact will occur.

d) **No Impact.** The Project site is not located within or near any State Responsibility Areas. According to the Federal Emergency Management Agency (FEMA) Flood Maps, the Project site is in an area of 0.2% annual chance flood, 1% annual chance flood with average depths of 1 foot. No impacts will occur.

4.21 – Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) **Less than Significant with Mitigation Incorporated.** The proposed Project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1, and would not result in excessive light or glare. The Project site is located within a developed area with no natural habitat. The proposed Project would not significantly impact any sensitive plants, plant communities, fish, wildlife, or habitat for any sensitive species. Impacts to burrowing owl and nesting birds will be less than significant with implementation of **Mitigation Measure BIO-1** and adherence to existing regulations. There are no jurisdictional waters on the Project site.

All buildings on the site were recently demolished and there will be no adverse impacts to historic resources. Construction-phase procedures would be implemented in the event any important archaeological or tribal cultural resources are discovered during grading, consistent with **Mitigation Measures CUL-1 through CUL-15 and TCR-1**. Construction-phase procedures would be implemented in the event any important paleontological resources are discovered during grading, consistent with **Mitigation Measures GEO-1 through GEO-4**. This site is not known to have any association with an

important example of California's history or prehistory. The environmental analysis provided in Section 4.3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts would be less than significant with mitigation. Sections 4.8 concludes that impacts related to climate change would be less than significant. Section 4.10 concludes that impacts related to hydrology and water quality would be less than significant with mitigation incorporated. Based on the preceding analysis of potential impacts in the responses to items 4.1 thru 4.20, no evidence is presented that this proposed Project would degrade the quality of the environment. Impacts related to degradation of the environment, biological resources, hydrology and water quality, and cultural resources would be less than significant with mitigation incorporated.

b) **Less than Significant with Mitigation Incorporated.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long-term, due to the permanent land-use changes and operational characteristics involved with the proposed Project. Cumulative impacts would be less than significant with mitigation incorporated, as further discussed herein.

Aesthetics

Impacts related to aesthetics in Section 4.1 at the project level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to this topic would occur.

Agricultural Resources

The analysis provided in Sections 4.2 found that no individual impacts would occur; therefore, the Project could not contribute considerably to local agriculture or forestry.

Air Quality

The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant with regulatory compliance including standard conditions of approval. Therefore, the Project would not contribute to localized or regional cumulative impacts.

Biological Resources

The analysis provided in Section 4.4 found that no individual impacts to sensitive species or migratory birds would occur; therefore, the Project could not contribute considerably to regional impacts on such species. It was also found that potential impacts to burrowing owl and nesting birds would be less than significant with adherence to existing regulations and **Mitigation Measure BIO-1**. The Project would have no other impacts on biological resources and would not result in localized or regional cumulative impacts.

Cultural Resources

Section 4.5 indicates that loss of onsite archaeological resources could reduce or eliminate important information relevant to the County of San Bernardino and the City of Highland. Impacts related to cultural resources were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the Project could contribute considerably to significant localized cumulative impacts in this topic area. **Mitigation Measures CUL-1 through CUL-15 and TCR-1** have been incorporated to reduce impacts to archaeological resources and to buried human remains. Implementation of these measures would eliminate any potential loss of important local archaeological information or human remains that may be buried under the Project site; therefore, the proposed Project would have no contribution to a cumulative loss of important local or regional archaeological knowledge.

Energy

The analysis provided in Section 4.6 found that no individual impacts related to energy use would occur as a result of the proposed Project with adherence to existing regulations and standard conditions of approval. Therefore, the Project will not contribute to cumulative energy impacts.

Geology and Soils

Section 4.7 indicates that impacts related to geology at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Impacts related to paleontological resources were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the Project could contribute considerably to significant localized cumulative impacts in this topic area. Implementation of **Mitigation Measures GEO-1 through GEO-4** would eliminate any potential loss of important local paleontological information that may be buried under the Project site. Therefore, the proposed Project would have no contribution to a cumulative loss of important local or regional paleontological knowledge. As such, no cumulative impacts related to this topic would occur.

Greenhouse Gas Emissions

As discussed in Section 4.8, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The Project would not contribute considerably to global climate change with adherence to existing regulations and standard conditions of approval.

Hazardous Materials

The analysis provided in Section 4.9 related to hazards and hazardous materials found that impacts would be less than significant with mitigation on a site specific basis because the site was found to have contamination from past activities. Development proposals on other sites would likely recommend mitigation if previous contamination were found. Therefore, CEQA and existing regulations require individual projects to mitigate their own specific impacts regarding hazardous materials when present. Implementation of site specific remediation measures and compliance with all regulations related to the disposal and storage of household hazardous waste would ensure that cumulative impacts would be less than significant.

Hazards and Hazardous Materials

Section 4.10 indicates that impacts related to hazardous materials, other hazards, and airport hazards at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. **Mitigation Measure HAZ-1** will be implemented to assure the site is sufficiently remediated of past hazmat facilities and contaminants. Therefore, no cumulative impacts related to this topic would occur.

Wildfires

The analysis provided in Section 4.9(g) and 4.20 found that no individual, local, or regional impacts would occur; therefore, no cumulative impacts related to this topic would occur.

Groundwater Levels

The analysis provided in Section 4.10 (b) found that less than significant local or regional impacts would occur; therefore, while the Project would contribute to individual, localized, or regional cumulative impacts, the Project contribution would not be considerable.

Drainage/Water Quality

The analysis provided in Section 4.10 (a), (c), (d), (e), and (f), found that less than significant individual, local, or regional impacts would occur; therefore, while the proposed Project would contribute to individual, localized or regional cumulative impacts, its contribution would not be considerable.

Flooding

The analysis provided in Section 4.10 (d) found that no regional impacts would occur; therefore, no cumulative impacts related to this topic would occur.

Land Use and Planning

The analysis provided in Section 4.11 related to Land Use and Planning found that impacts would be less than significant; therefore, while the proposed Project would contribute to individual, localized, or regional cumulative impacts, its contribution would not be considerable.

Mineral Resources

The analysis provided in Section 4.12 related to mineral resources found that there would be no impact; therefore, the Project contribution would not be considerable.

Noise

As discussed in Section 4.12, on-site operational noise is not anticipated to result in perceptible increases in ambient noise with the implementation of Best Management Practices. Therefore, the proposed Project would not contribute considerably to noise levels in the immediate vicinity of the Project. The Project would contribute to temporary increases in noise levels in the immediate Project vicinity during construction activities; however, Best Management Practices would be incorporated to ensure that impacts to nearby sensitive receptors remain less than significant. The Project would increase traffic in the Project area; however, Project traffic-related noise would not be discernible (as discussed in Section 4.13.a) to the public and, therefore, would have no considerable contribution to cumulative traffic-related noise.

Population and Housing

The analysis provided in Section 4.14 related to Population and Housing found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

Public Services

The analysis provided in Section 4.15 related to Public Services found that impacts would be less than significant; therefore, while the proposed Project would contribute to localized cumulative impacts, the contribution would not be cumulatively considerable.

Recreation

The analysis provided in Section 4.16 related to Recreation found that impacts would be less than significant; therefore, no cumulative impacts related to this topic would occur.

Traffic and Transportation

Traffic conditions were analyzed in Section 4.17. a and found to be less than significant. There is and would be adequate capacity to serve the uses along 3rd Street and 5th Street even with the addition of the proposed Project. The site also has access to bus transit, sidewalks, and eventually bike lanes in the Project area. The Project will also implement **Mitigation Measures VMT-1 through VMT-3** to help reduce regional impacts from increased vehicle miles traveled. Therefore, the proposed Project's contribution to cumulative impacts to local and regional transportation facilities would not be considerable.

Tribal Cultural Resources

The analysis provided in Section 4.18 related to Tribal Cultural Resources (TCRs) identified that despite the previous disturbances of the Project site and developed nature of the Project area that may have displaced or submerged archaeological resources relating to TCRs on the surface, it is possible that intact tribal cultural resources exist at depth. Due to this uncertainty, **Mitigation Measures CUL-1 through CUL-15 and TCR-1** have been incorporated to address any previously undiscovered archaeological resources (including buried human remains) relating to TCRs encountered during Project implementation. Incorporation of these mitigation measures would ensure that potential impacts to buried TCRs are less than significant through requirements for evaluation, salvage, curation, and reporting.

Utilities and Service Systems

The analysis provided in Section 4.19 related to Utilities and Service Systems found that impacts would be less than significant; therefore, while the Project would contribute to localized or regional cumulative impacts, the Project contribution would not be considerable.

Wildfire

The analysis provided in Section 4.20 related to Wildfire found that no impacts would result; therefore, no cumulative impacts related to this topic would occur.

c) **Less than Significant with Mitigation Incorporated.** Based on the analysis of the Project's impacts in the responses to items 4.1 thru 4.20, there is no indication that this Project could result in substantial adverse effects on human beings, although **Mitigation Measure HAZ-1** will be implemented to assure the site is sufficiently remediated of past hazmat facilities and contaminants. While there would be a variety of temporary adverse effects during construction related to noise, these would be reduced to less than significant levels through regulatory compliance. In addition, **Mitigation Measures NOI-1 through NOI-3** will be implemented to help assure potential noise impacts from construction remain at less than significant levels. Long-term effects include increased vehicular traffic, traffic-related noise, use of commercial hazardous materials, emissions of criteria pollutants and greenhouse gas emissions, and increased demand for emergency response services. The analysis herein concludes that direct and indirect environmental effects would at worst require mitigation to reduce to less than significant levels. Environmental effects would result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings would be less than significant with mitigation incorporated.

This Page Intentionally Left Blank

BIOLOGICAL RESOURCES

BIO-1 Pre-construction Survey for Burrowing Owl and Ground Nesting Birds. Prior to ground disturbance, the following two surveys shall be conducted to determine presence or absence of burrowing owl or ground nesting birds on the site.

Burrowing Owl. No more than 14 days prior to ground disturbance a focused survey for burrowing owl will be required to ensure take avoidance. Even though burrowing owls were not located as part of the general biological survey, a pre-construction survey for burrowing owl is required because burrowing owls may encroach or migrate to the property at any time, and therefore steps should be taken to ensure avoidance, including reevaluating the locations/presence of burrowing owl or burrows. Pre-construction surveys shall be conducted in accordance with the survey requirements outlined in Appendix D of the CDFW's *Staff Report on Burrowing Owl*, dated March 7, 2012. If burrowing owl are found on the Project Site during pre-construction surveys, the biologist conducting surveys shall immediately contact the CDFW to develop a plan for avoidance and/or translocation prior to construction crews initiating any ground disturbance on the Project Site.

Ground Nesting Birds. To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in San Bernardino County extends from February 1 through September 1.

If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys for nesting birds will be conducted by a qualified biologist to ensure that no nests would be disturbed during project implementation. These surveys will be conducted no more than 5 days prior to the initiation of any site disturbance activities and equipment mobilization, including tree, shrub, or vegetation removal, fence installation, grading, etc. If project activities are delayed by more than 5 days, an additional nesting bird survey will be performed. During this survey, the biologist will inspect all trees and other potential nesting habitats (e.g., trees and shrubs) in and immediately adjacent to the impact area for nests. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys will be documented.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the qualified biologist will determine the extent of a construction-free buffer zone to be established around the nest (typically up to 300 feet for raptors and up to 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. Within the buffer zone, no site disturbance and mobilization of heavy equipment, including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, demolition, and grading will be permitted until the chicks have fledged.

A qualified biologist is an individual who has a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for nesting birds. During or following academic training, the qualified biologist will have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements.

CULTURAL RESOURCES

- CUL-1 Retain a Native American Monitor/Consultant.** The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians - Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the Project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.
- CUL-2 Unanticipated Discovery of Tribal Cultural and Archeological Resources.** Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the Project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources.
- CUL-3 Public Resources Code Sections 21083.2(b) for Unique Archaeological Resources.** Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin 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, they shall be offered to a local school or historical society in the area for educational purposes.
- CUL-4 Archaeological Monitoring.** Due to the heightened cultural sensitivity of the proposed Project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed Project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive

thorough levels of monitoring coverage. Monitoring may cease if the archaeologist and Tribal monitor agree that continued efforts are unneeded, and if the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) agrees with the assessment. A Monitoring and Treatment Plan that is reflective of the Project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to SMBMI. Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the Project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-5 Tribal Monitoring. Due to the heightened cultural sensitivity of the proposed Project area, Tribal monitors representing the San Manuel Band of Mission Indians shall be present for all ground-disturbing activities that occur within the proposed Project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of Tribal monitors shall be present each workday to ensure that simultaneously occurring ground-disturbing activities receive thorough levels of monitoring coverage. Monitoring may cease if the archaeologist and Tribal monitor agree that continued efforts are unneeded, and if the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) agrees with the assessment. A Monitoring and Treatment Plan that is reflective of the Project mitigation (“Cultural Resources” and “Tribal Cultural Resources”) shall be completed by the archaeologist, as detailed within SMBMI-CUL-1, and submitted to the Lead Agency for dissemination to SMBMI. Once all parties review and agree to the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the Project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan.

CUL-6 Treatment of Cultural Resources. If a pre-contact cultural resource is discovered during Project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the Archaeological Monitor/applicant, and the Lead Agency shall confer regarding treatment of the discovered resource, as detailed within the Monitoring and Treatment Plan. A research design shall be developed and will include a plan to evaluate the resource for significance under CEQA criteria. The research design shall also acknowledge that, regardless of significance under CEQA, all finds are subject, if feasible, to avoidance/preservation in place as treatment. Should any resource(s) not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by SMBMI. All plans for analysis shall be reviewed and approved by the applicant and SMBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during Project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloging and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and SMBMI. All reburials are subject to a reburial agreement that shall be developed between the landowner and SMBMI outlining the determined

reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.). Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can include the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees. All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and SMBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and SMBMI.

CUL-7 Tribal Consultation. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and an archaeologist meeting the Secretary of Interior's professional qualification standards in archaeology shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed in TCR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment.

Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural 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.

CUL-8 Tribal Resources. 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 for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

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.

CUL-9 Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in PRC 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 PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation 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 that they are those of a Native American, he or she shall contact, by telephone

within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

- CUL-10 Resource Assessment and Continuation of Work Protocol.** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at a minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).
- CUL-11 Kizh-Gabrieleno Procedures for Burials and Funerary Remains.** If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures 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 burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains 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.
- CUL-12 Treatment Measures.** Prior to the continuation of ground-disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will 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. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains. 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.
- CUL-13 Professional Standards.** Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior

standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

CUL-14 Inadvertent Discoveries of Human Remains/Funerary Objects. In the event that any human remains are discovered within the Project area, ground-disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify SMBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98. Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties. It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

CUL-15 Human Remains. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

GEOLOGY/SOILS/PALEONTOLOGICAL RESOURCES

GEO-1 Conduct Paleontological Sensitivity Training for Construction Personnel. The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct a Paleontological Sensitivity Training for construction personnel prior to commencement of excavation activities. The training will include a handout and will focus on how to identify paleontological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event; the duties of paleontological monitors; notification and other procedures to follow upon discovery of resources; and, the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

- GEO-2 Conduct Periodic Paleontological Spot Checks During Grading and Earth-moving Activities.** The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, shall conduct periodic Paleontological Spot Checks beginning at depths below six (6) feet to determine if construction excavations have extended into older Quaternary deposits. After the initial Paleontological Spot Check, further periodic checks will be conducted at the discretion of the qualified paleontologist. If the qualified paleontologist determines that construction excavations have extended into the older Quaternary deposits, construction monitoring for Paleontological Resources will be required. The Applicant shall retain a qualified paleontological monitor, who will work under the guidance and direction of a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology. The paleontological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into the older Pleistocene alluvial deposits. Multiple earth-moving construction activities may require multiple paleontological monitors. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known paleontological resources and/or unique geological features, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of paleontological resources and/or unique geological features encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the qualified professional paleontologist.
- GEO-3 Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered.** In the event that paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the Applicant and the City. Work shall be allowed to continue outside of the buffer area. The Applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.
- GEO-4 Prepare Report Upon Completion of Monitoring Services.** Upon completion of the above activities, the professional paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the Applicant, the City, the Natural History Museums of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

HAZARDS/HAZARDOUS MATERIALS

- HAZ-1 Hazardous Materials Remediation.** Prior to issuance of a building permit, the applicant shall document that the site has been remediated based on the recommendations included in the Phase I Environmental Site Assessment (*Phase I ESA*) prepared for the Project site dated March 1st, 2022 and the Phase II Subsurface Investigation Report (*Phase II ESA*) prepared and dated March 31, 2022. Both reports were prepared by Partner Engineering and Science, Inc., and are included in Appendix E of the IS/MND. This measure shall be implemented to the satisfaction of the City Planning Division in consultation with the San Bernardino County Fire Department,

Hazardous Materials Division (as the County's Consolidated Unified Program Agency or CUPA), County Department of Public Health, California Department of Toxic Substances Control (DTSC), and other regulatory agencies if or as needed. Prior to issuance of a building permit, the applicant shall submit a closure report documenting the various hazardous materials characterization studies, their conclusions and recommendations, and all remediation activities for identified hazmat conditions.

Due to the age of the recently demolished buildings, there may still be asbestos-containing materials (ACMs) and/or lead-based paints (LBPs) present. These are considered Business Environmental Risks (BERs) and sampling of possible ACMs and LBPs will need to be done on any remaining demolition materials onsite if they are present prior to grading. Other BERs identified on the Project site include oil spillage in former auto-maintenance areas, four septic tanks systems, and a potential concrete sump. Oil-stained soils shall be disposed of if encountered, the sump and septic tanks removed and abandoned with regard to applicable regulatory requirements.

Once all remaining demolition waste has been removed from the site, onsite soils shall be tested to determine if or to what degree they can be used for Project grading based on regulatory standards for industrial buildings. Prior to issuance of a grading permit, the applicant shall demonstrate to the satisfaction of the City Engineer that the onsite soils meet appropriate regulatory standards for industrial properties.

NOISE

- NOI-1 Notify Adjacent Land Use of Construction Activities.** During all construction-related activities, the applicant and/or its designated contractor, contractor's representatives, and all other appropriate personnel shall notify adjacent land uses of planned construction activities. This notice shall be provided at least one week prior to the start of any construction activities, describe the construction noise control best management practices to be implemented by the Project, and include the name and phone number of a designated contact for the Applicant and the City of Highland responsible for handling construction-related noise complaints. This notice shall be provided to the owner/occupants of all occupied properties within 250 feet of the Project site.
- NOI-2 Restrict Work Hours/Equipment Noise.** All work shall be subject to the requirements in City Code Section 15.48.020.A and General Plan Goal 7.3, Action 1. Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 6:00 PM, Monday through Saturday. Construction activities shall be prohibited on Sundays and City- and Federal-observed holidays. The applicant and/or its contractor shall post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.
- NOI-3 Construction Equipment Restrictions.** The following measures shall apply during all of the construction-related activities:
- Contractors shall use the smallest size equipment capable of safely completing work activities.
 - Construction staging shall occur as far away from the residential properties on West 5th Street as possible.
 - All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be located as far from the residential properties on West 5th Street as possible.

- Heavy equipment engines shall be covered, and exhaust pipes shall include a muffler in good working condition.
- Pneumatic tools shall include a noise suppression device on the compressed air exhaust.
- The Applicant and/or his contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators. This measure shall be subject to the approval of the local electric utility.
- No radios or other amplified sound devices shall be audible beyond the property line of the construction site.

TRANSPORTATION

- VMT-1 Commute Trip Reduction (CTR) Marketing Program.** The Project shall implement a marketing program to promote the project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness.
- Onsite or online commuter information services.
 - Employee transportation coordinators.
 - Onsite or online transit pass sales.
 - Guaranteed ride home service
- VMT-2 Ridesharing Program.** The Project shall provide a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. Ridesharing must be promoted through a multifaceted approach. Examples include but are not limited to the following.
- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
 - Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles.
 - Providing an app or website for coordinating rides
- VMT-3 End-of-Trip Bicycle Facilities.** The Project shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT. End-of-trip facilities should be installed at a size proportional to the number of commuting bicyclists and regularly maintained.

TRIBAL CULTURAL RESOURCES

- TCR-1** The Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be

Mitigation Summary

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.

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.

This Page Intentionally Left Blank

6.1 – List of Preparers

City of Highland (Lead Agency)

Planning Division
27215 Base Line
Highland, California 92346
909-864-6861, ext. 258

- Angela Tafolla, Associated Planner

MIG, Inc.

1650 Spruce Street, Suite 106
Riverside, California 92507
(951) 787-9222

- Bob Prasse, Director of Environmental Services
- Kent Norton, Senior Environmental Planner/Project Manager
- Chris Dugan, Director of Air Quality, GHG, and Noise Services
- Cameron Hile, Senior Analyst
- Betty Kempton, PhD, Senior Biologist

Urban Crossroads

20341 SW Birch Street, Suite 230
Newport Beach, CA 92660
(949) 660-1994

- Charleen So, Principal, Traffic Engineer
Alexander So, Senior Associate

6.2 – Persons and Organizations Consulted

- N/A

6.3 – Bibliography

- ¹ City of Highland Municipal Code Section 1123.20, *Structures Permitted Above Height Limits*. City of Highland City Council passed June 22, 2022.
- ² Caltrans. *California State Scenic Highway System Map*. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. [Accessed June 9, 2023].
- ³ City of Highland Municipal Code. *Land Use and Development, General Development Standards*. <https://www.codepublishing.com/CA/Highland/#!/Highland16/Highland1640.html#16.40.160>. [Accessed June 2023].
- ⁴ California Department of Conservation. *California Important Farmland Finder*. <https://maps.conservation.ca.gov/DLRP/CIFF/>. [Accessed June 9, 2022].
- ⁵ City of Highland. *Zoning Map (PDF)*. <https://www.cityofhighland.org/298/Zoning>. [Accessed June 2023].
- ⁶ San Bernardino County Assessor-Recorder-Clerk. *Williamson Act, Parcels*. <https://sbcountyarc.org/faq/williamson-act/>. [Accessed June 2023].
- ⁷ MIG, *Air Quality and Health Risk Assessment, Highland East Industrial Warehouse*, June 2, 2023.
- ⁸ MIG. *General Biological Resources Assessment, Highland East Warehouse Development Project*. August 2022.
- ⁹ MIG, Inc. *Burrowing Owl Survey Report, Highland East Warehouse Development Project*. August 2022.
- ¹⁰ MIG. *Energy and Greenhouse Gas Impact Analysis Report, Highland East Industrial Warehouse*, June 2, 2023.
- ¹¹ Southern California Geotechnical. *Updated Geotechnical Investigation, Proposed Warehouse, City of Highland*. September 7, 2022.
- ¹² Southern California Geotechnical. *Results of Infiltration Testing, Proposed Warehouse, City of Highland*. September 8, 2022.
- ¹³ California Department of Conservation. *California Earthquake Hazards Zone Application*. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. [Accessed June 2023].
- ¹⁴ City of Highland. *General Plan: Public Health and Safety Element*. <https://www.cityofhighland.org/191/General-Plan>. [Accessed June 2023].
- ¹⁵ City of Highland Municipal Code. *Chapter 15.04 California Building Code*. <https://www.codepublishing.com/CA/Highland/#!/Highland15/Highland1504.html#15.04>. [Accessed June, 2022].
- ¹⁶ City of Highland. *General Plan: Public Health and Safety Element*. <https://www.cityofhighland.org/191/General-Plan>. [Accessed June 2023].
- ¹⁷ City of Highland. *General Plan: Public Health and Safety Element*. <https://www.cityofhighland.org/191/General-Plan>. [Accessed June 2023].

- 18 East Valley Water District. *Groundwater Resources*. <https://www.eastvalley.org/121/Groundwater-Resources>. [Accessed June 2023].
- 19 California Department of Conservation. *California's Groundwater Live; Current Groundwater Levels*. <https://sgma.water.ca.gov/CalGWLIVE/#groundwater>. <https://storymaps.arcgis.com/stories/b3886b33b49c4fa8adf2ae8bdd8f16c3>. [Accessed June 2023].
- 20 Southern California Geotechnical. *Geotechnical Investigation Two Proposed Warehouses*. June, 2022.
- 21 Kier+Wright Engineers. Preliminary Water Quality Management Plan. February 27, 2023.
- 22 Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, Third Street and Central Avenue, Highland*, March 1, 2022.
- 23 Partner Engineering and Science, Inc. Phase II Subsurface Investigation Report, Highland. March 31, 2022.
- 24 Partner Engineering and Science, Inc. Soil Management Plan, Highland. June 28, 2022.
- 25 California Environmental Protection Agency. Cortese List Data Resources. <http://www.calepa.ca.gov/sitecleanup/corteselist/> [Accessed June 2023].
- 26 California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm [Accessed July 2023].
- 27 California State Water Resources Control Board. GeoTracker. <https://geotracker.waterboards.ca.gov/> [Accessed July 2023].
- 28 California State Water Resources Control Board. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. <http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CurrentList.pdf> [Accessed June 2023].
- 29 California State Water Resources Control Board. List of Active CDO and CAO. <http://www.calepa.ca.gov/sitecleanup/corteselist/> [Accessed June 2023].
- 30 California Department of Toxic Substances Control. Cortese List: Section 65962.5(a). <https://www.calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/> [Accessed December 2022].
- 31 Riverside County Fire Hazard Severity Zones Maps. <https://koordinates.com/layer/96850-riverside-county-ca-fire-hazard-severity-zones/>. [Accessed June 2023].
- 32 Kier+Wright Engineers. A Preliminary Water Quality Management Plan. February 27, 2023.
- 33 MIG, Inc. *Noise Impact Analysis Report, Highland East Industrial Warehouse*. June 8, 2023.
- 34 Urban Crossroads. Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis, Highland East Warehouse Project. March 21, 2023.
- 35 San Bernardino County. *2020 San Bernardino Valley Regional Urban Water Management Plan*. <http://www.sbvwmwd.com/home/showdocument?id=4196>. [Accessed June 2023].