CITY OF LOMA LINDA

DRAFT MITIGATED NEGATIVE DECLARATION
PEDIATRIC MEDICAL OFFICE BUILDING
(PROJECT # PPD P23 - 180)
SCH #_____

LEAD AGENCY
City of Loma Linda
Community Development Department
25541 Barton Rd.
Loma Linda, CA 92354
Phone: 909-799-2839

CONSULTANT ASSISTANCE
RPG, INC.
9431 Haven Ave, Suite 232
Rancho Cucamonga, CA. 91730

DECEMBER 5, 2024

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CITY OF LOMA LINDA
LOMA LINDA UNIVERSITY CHILDREN'S HOSPITAL
PEDIATRIC MEDICAL OFFICE BUILDING
DRAFT MITIGATED NEGATIVE DECLARATION.

PROJECT SUMMARY

APNs:	0284-191-23	***Street Address:***	11353 Anderson Street Loma Linda, CA. 92354
Applicant or Agent:	Applicant : Loma Linda University Medical Center, a California corporation.	***Project Contact Information:***	Agent: Leticia Gasca Guerrero, Loma Linda University Medical Center, 11155 Mountain View Ave, Loma Linda, CA. 92354 Phone : 909.253.5693 Email: lgascaguerrero@llu.edu
Project Name:	Pediatric Medical Office Building	***Project Case Number;***	Precise Plan of Design P23-180
Existing Zoning:	Institutional Health Care (I-HC)	***Existing General Plan Designation:***	Institutional Health Care (I-HC)
Site Acreage:	5.84 acres	***Existing Land Use:***	Surface Parking Lot
Summary of Proposal:	Development of a new medical office building on approximately 3.6 acres of the 5.84 acre site with a 5-story, approximately 105,000 sf medical office building. The facility will include primarily hospital-based pediatric clinics with approximately 150 exam rooms and associated support facilities. Other improvements are proposed to include surface parking, patient drop-off and loading areas, landscaping, and site lighting. Outdoor amenity space for patients, visitors and staff are included in the proposed site design. Existing access points along Barton Road and Anderson Street will be maintained, as will a portion of the existing surface parking east of the Barton Road site access.		

LEAD AGENCY PROJECT CONTACT INFORMATION:

- **Lead Agency: City of Loma Linda**
  Community Development Department
  25541 Barton Road
  Loma Linda, CA. 92354

Contact Person: Lorena Matarrita, Community Development Director
Phone: 909-799-2839
Email: LMatarrita@lomalinda-ca.gov

CEQA STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with Sections 15051 and 15367 of the California Code of Regulations (CCR), the City of Loma Linda ("City") is identified as the Lead Agency for the project. Under CEQA (Public Resources Code [PRC] Section 21000-21177) and pursuant to Section 15063 of the CCR, the City is required to undertake the preparation of an Initial Study to determine if the project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that additional CEQA analysis is warranted to fully evaluate project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project may cause a significant effect on the environment, the Lead Agency shall find that the project would not have a significant effect on the environment and shall prepare a Negative Declaration (or Mitigated Negative Declaration).

The environmental documentation, which is ultimately selected by the Lead Agency in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for considering discretionary actions necessary to approve or undertake the project. The resulting documentation is not, however, a policy document, and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required.

PURPOSE

CEQA Guidelines Section 15063 identifies the following specific contents for inclusion in an Initial Study:

- A description of the project, including the location of the project;
- An identification of the environmental setting;
- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- A discussion of ways to mitigate significant effects identified, if any;
- An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

AGENCY CONSULTATION

Pursuant to CEQA Guidelines Section 15063(g), as soon as the Lead Agency has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project in order to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

INCORPORATION BY REFERENCE

The following documents were used during preparation of this Initial Study and are incorporated into this document by reference. These documents are available for review at the City of Loma Linda Community Development Department, 25541 Barton Road, Loma Linda, CA. 92354. City Hall Hours: Monday through Thursday, 7:00am to 5:30pm.

- Loma Linda Municipal Code.
- Loma Linda General Plan EIR, 2004 and General Plan Update EIR, 2008.

PROJECT DESCRIPTION

- **Surrounding Land Uses and Setting**

TABLE 1.0
EXISTING GENERAL PLAN LAND USE AND ZONING DISTRICTS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Location	Existing GP Land Use	Existing Zoning District
Project Site	Institutional Healthcare (I-HC)	Institutional Healthcare(I-HC)
North	High Density Residential (R-3) across Barton Road	High Density Residential (R-3) across Barton Road
South	Institutional Healthcare (I-HC)	Institutional Healthcare (I-HC)
East	Low Density Residential (R-1)	Low Density Residential (R-1)
West	Institutional Healthcare (I-HC)	Institutional Healthcare (I-HC)

- **Project Site Location, Existing Site Land Uses and Conditions**

The 5.84-acre Project Site is located in the central area of the City on the south side of Barton Road across from the Loma Linda University Medical Center (LLUMC) at Anderson Street, and is currently occupied by a landscaped surface parking lot which serves multiple surrounding medical offices and facilities. The site is addressed at 11353 Anderson Street.

Barton Road provides regional access to the area. The Project Site is accessed off Barton Road and Anderson Street by 32-foot-wide drives. The Barton Rd/Anderson St intersection is signalized. Barton Road is a 4-lane divided roadway with a 143 ft wide paved cross-section along the western property line, while Anderson Street has a 66 ft wide paved cross-section adjacent to the Project Site. Utilities and storm drains are located in Barton Road and Anderson Street. Sidewalks exist along street frontages and a bus stop is located across Barton Road near the intersection with Anderson Street. A marked mid-block pedestrian crossing exists on Anderson Street, which connects the site to medical faculty offices to the west. Street lighting exists along the site perimeter on all street frontages, and within the existing on-site parking lot.

The site topography is essentially level and contains ornamental landscaping typical of developed suburban sites. The Project Site is immediately surrounded by three-story medical faculty office uses to the west, two-story medical offices to the south (LLUMC Kidney Center) and the Ronald McDonald House which varies from two to three stories in height. Low density residential land uses (one to two stories) are located to the south along Tulip Avenue beyond the LLUMC Kidney Center and the Ronald MacDonald House, to the east beyond the parking lot (Daisy Avenue, Fern Avenue, Tulip Avenue) and to the north across Barton Road, east of the LLUMC hospital complex, which is 16 stories high at its highest. Exhibits 1-3 illustrate the Regional Location, Local Vicinity, and Project Site Vicinity respectively. Exhibit 4 provides the Assessor's Parcel Map for the project site. Exhibits 5A - 5D provide photographs of typical existing conditions on-site and in immediately adjacent areas.

- **Project Characteristics**

The project proposes construction of a new 105,000 square-foot, five-story medical office/clinic building. The proposed program for the facility includes primarily hospital-based pediatric clinics with approximately 150 exam rooms and associated support uses. In addition to construction of the medical office building, improvements are to include new parking, patient drop-off and loading areas, landscaping, and site lighting. Outdoor amenity space for patients, visitors and staff are included in the site design. The architectural style of the proposed building is contemporary and consistent in character with existing structures within the LLUMC complex. Existing access points along Barton Road and Anderson Street are to be maintained, as will a portion of the exiting surface parking east of the Barton Road site access.

Proposed landscaping will incorporate a combination of accent plants, ornamental grasses, flowering perennials, groundcovers and shrubs. Accent plants will be 5-gallon in size while all others are proposed to be 1-gallon in size. Existing parkway landscaping along Barton Road and Anderson Street will remain.

Table 2.0 summarizes the characteristics of the proposed project and provides reference to applicable Municipal Code design standards. Exhibit 4 illustrates the Assessor's Parcel Map. Exhibits 5A-D provide photographs of existing site conditions and Exhibit 6 illustrates the Proposed Project Site Plan. Exhibit 7 illustrates the proposed Landscape Plan. Exhibit 8 illustrates the Fire Access Plan. Exhibits 9A -C illustrate proposed Building Elevations.

TABLE 2.0
SUMMARY OF PROJECT CHARACTERISTICS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Development Feature	**Code Requirement[1]**	**Proposed Project[2]**
Parcel Coverage	Maximum 50%	21,000 Square Feet / 8.3%
Floor Area Ratio	Maximum 1.0	0.41 FAR/105,000 Sq Ft
Setbacks		
• From Street	Minimum 25 feet	Barton Road – 32' 0" Anderson Street – 29' 8"
• Front Setback	Minimum 25 feet	Complies
• Interior Side Setback	Minimum 10 feet	Complies
• Street Side Setback	Minimum 25 feet	Complies
• Rear Setback	Minimum 10 feet	Complies
Building Height	Maximum 180 feet	90 feet
Parking (per Municipal Code Section 17.24.070)	1 stall/300 sq ft – Medical Clinics	Per Code: 350 Stalls Proposed: 223 New stalls; Existing Stalls: 159 Total Stalls Proposed: 382 Drop-off/Loading Spaces – 4
Landscaping	Parking lot - One tree/5 parking spaces; Minimum 8% of parking lot area.	• Parking Lot Trees Required – 81.5; Proposed Parking Lot Trees – 84 (52 New, 32 Existing); • Parking Lot Landscape Area Required: 16,488 Sq.Ft. Proposed Parking Lot Landscape Area: 18,365 Sq.Ft.

1 – Source: City of Loma Linda Municipal Code

2 – Source: Project Plans; Mascari Warner Dinh Architects, 3/2024

The following is the Legal Description for the Project Site:

"THE LAND SITUATED IN THE CITY OF LOMA LINDA, COUNTY OF SAN BERNARDINO, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

PARCEL 2 OF PARCEL MAP 3529, AS PER MAP RECORDED IN BOOK 32, PAGES 45 AND 46 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY. EXCEPTING THEREFROM PARCEL 1 OF PARCEL MAP 13981, AS PER MAP RECORDED IN BOOK 167, PAGES 18 AND 19 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY FURTHER DEPICTED AS REMAINDER PARCEL OF PARCEL MAP 13981, AS PER MAP RECORDED IN BOOK 167, PAGES 18 AND 19 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY."

ENTITLEMENTS REQUESTED

The proposed project is consistent with the existing General Plan Land Use and Zoning designations of Institutional - Health Care (I-HC). Implementation will require the discretionary approval of a **Precise Plan of Design**, per Section 17.30.260090 of the Municipal Code. The assigned **Project Number is PPD No. P23-180**. No other discretionary actions are required.

CEQA also requires the certification of this Mitigated Negative Declaration as compliant with California Public Resources Code [PRC] Section 21000-2117 and Section 15063 of the California Code of Regulations.

ADDITIONAL APPROVALS REQUIRED BY OTHER PUBLIC AGENCIES

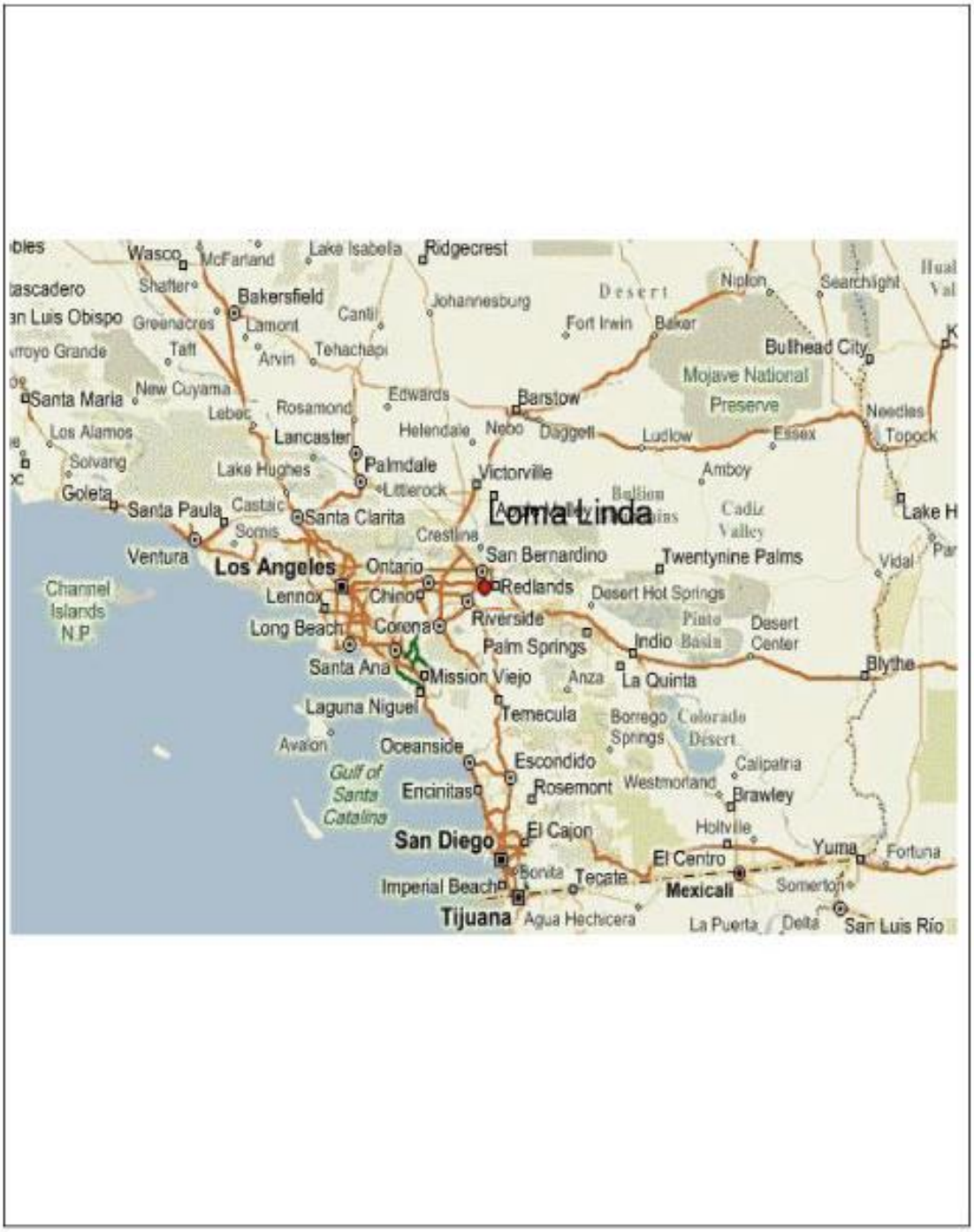
Federal: None.
State of California: None.
Regional: None.
County: None.
Local: None.

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

A cultural resources assessment and records search were conducted for the proposed project and is contained in Appendix B to this Initial Study. City Planning staff notified area Native American tribes recommended by the Native American Heritage Commission and received one reply from the Yuhaaviatam of San Manuel Nation. The Yuhaaviatam expressed interest in the Proposed Project and requested mitigation language outlined in Sections V- Cultural Resources, and XVII - Tribal Resources of this Initial Study although no known cultural resources were identified in the cultural resources assessment.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.



RPG ROMO PLANNING GROUP

EXHIBIT: 1

TITLE: REGIONAL LOCATION

source: N/A

RPG ROMO PLANNING GROUP

EXHIBIT: 2

TITLE: LOCAL VICINITY

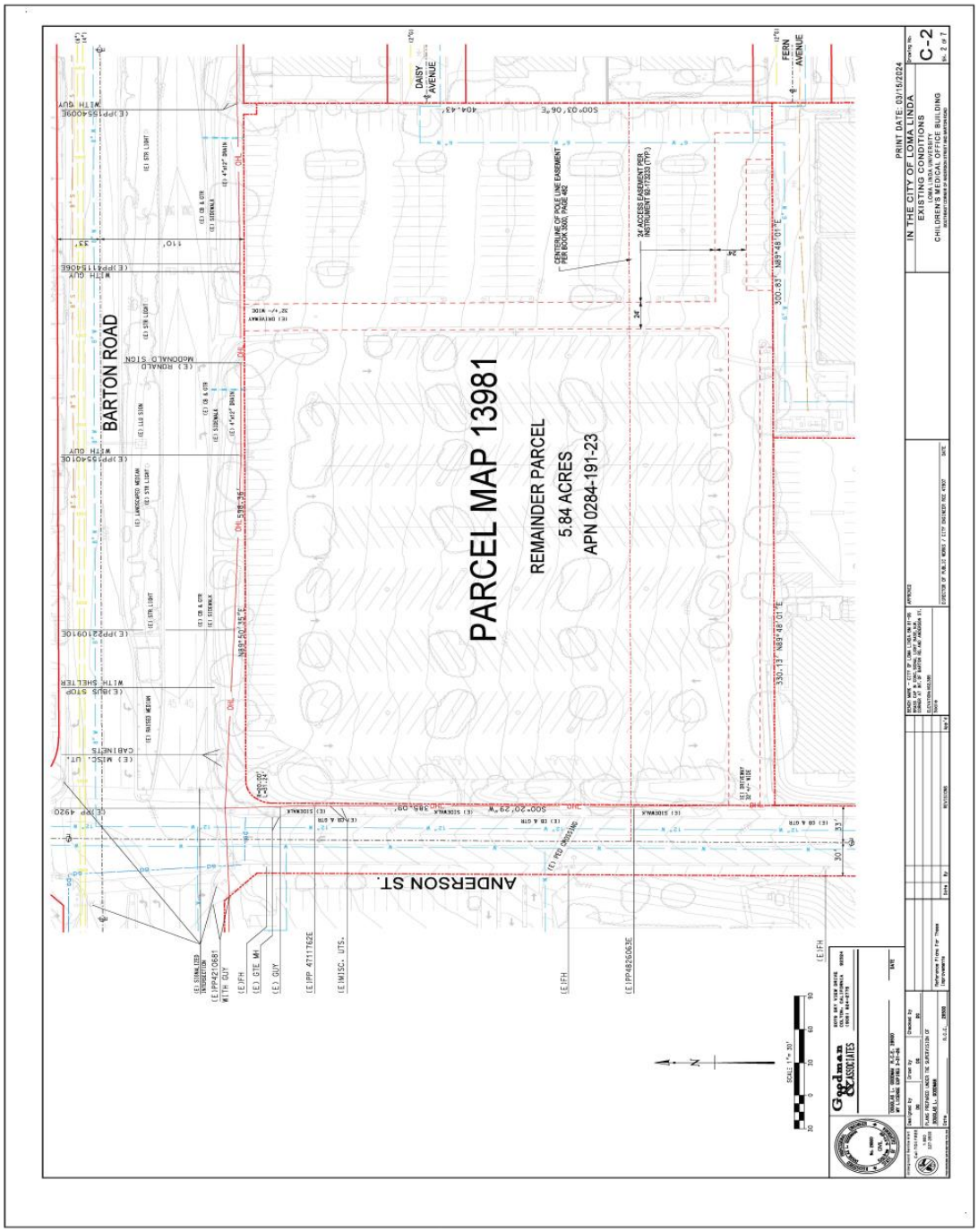
source: CITY OF LOMA LINDA

RPG ROMO PLANNING GROUP

EXHIBIT: 3

TITLE: PROJECT SITE AND VICINITY

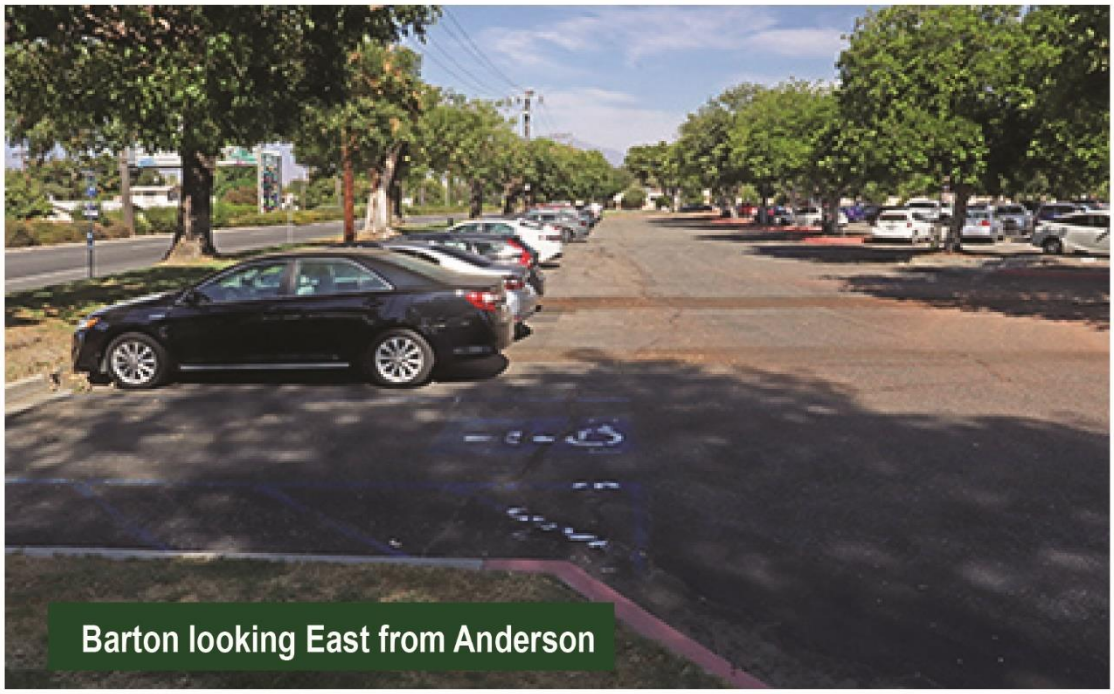
source: GOODMAN & ASSOCIATES MARCH 2024



ROMO PLANNING GROUP

EXHIBIT: 4
TITLE: PARCEL MAP

SOURCE: GOODMAN & ASSOCIATES MARCH 2024



RPG ROMO PLANNING GROUP

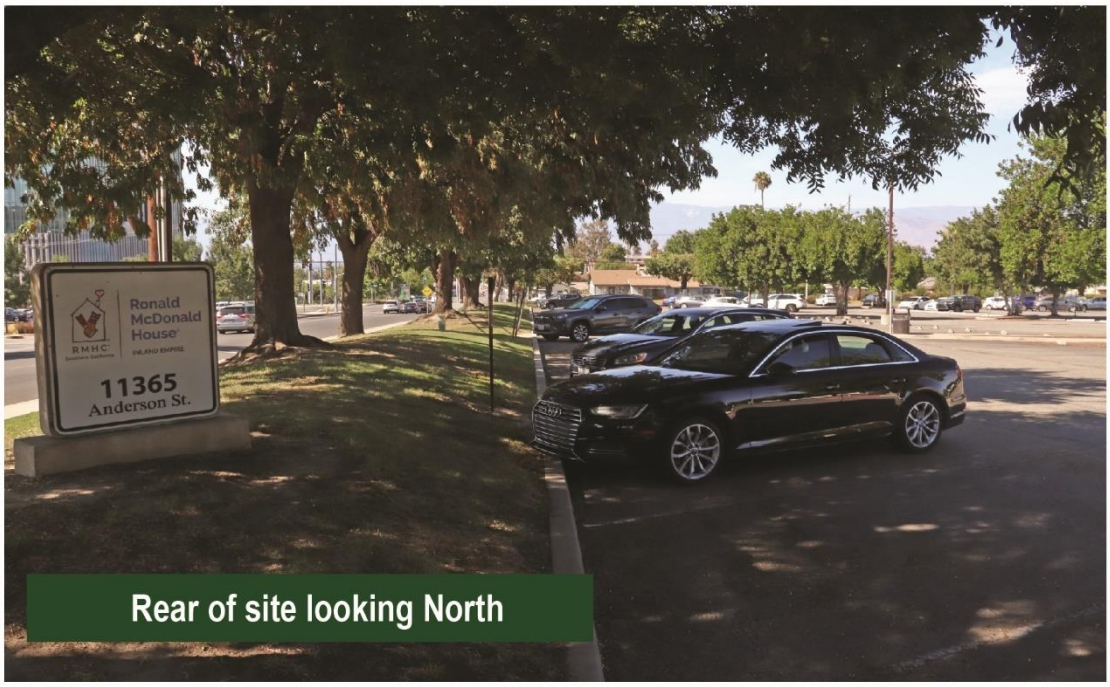
EXHIBIT: 5A

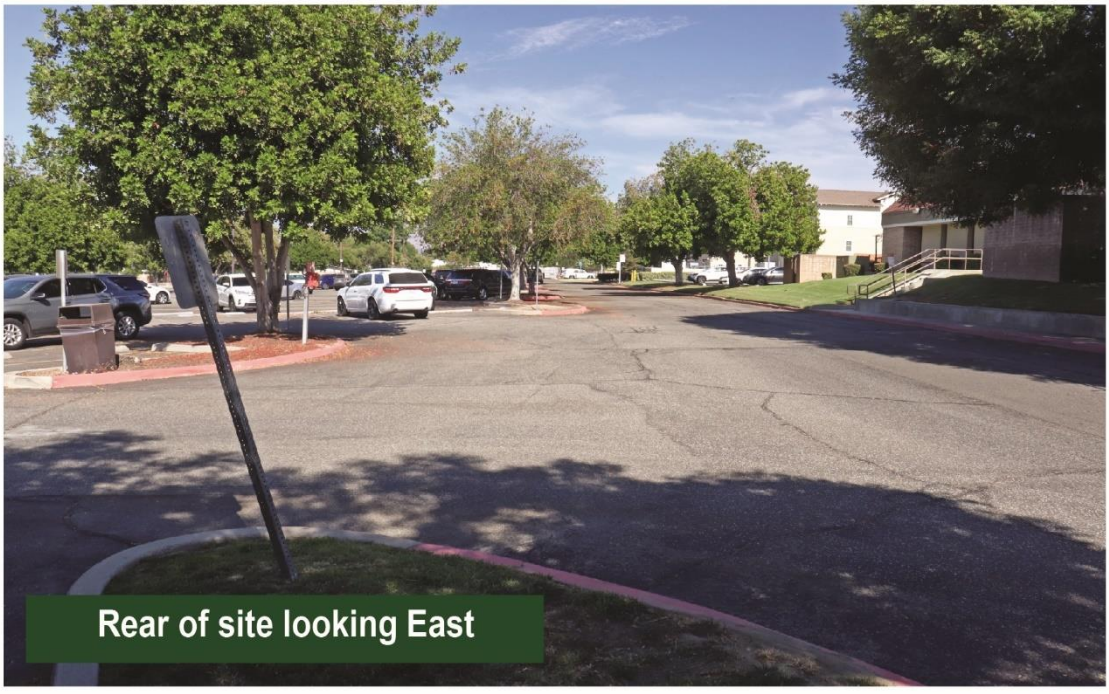
TITLE: Site Photos

RPG ROMO PLANNING GROUP

EXHIBIT: 5B

TITLE: Site Photos





RPG ROMO PLANNING GROUP

EXHIBIT: 5C

TITLE: Site Photos

RPG ROMO PLANNING GROUP

EXHIBIT: 5D

TITLE: Site Photos

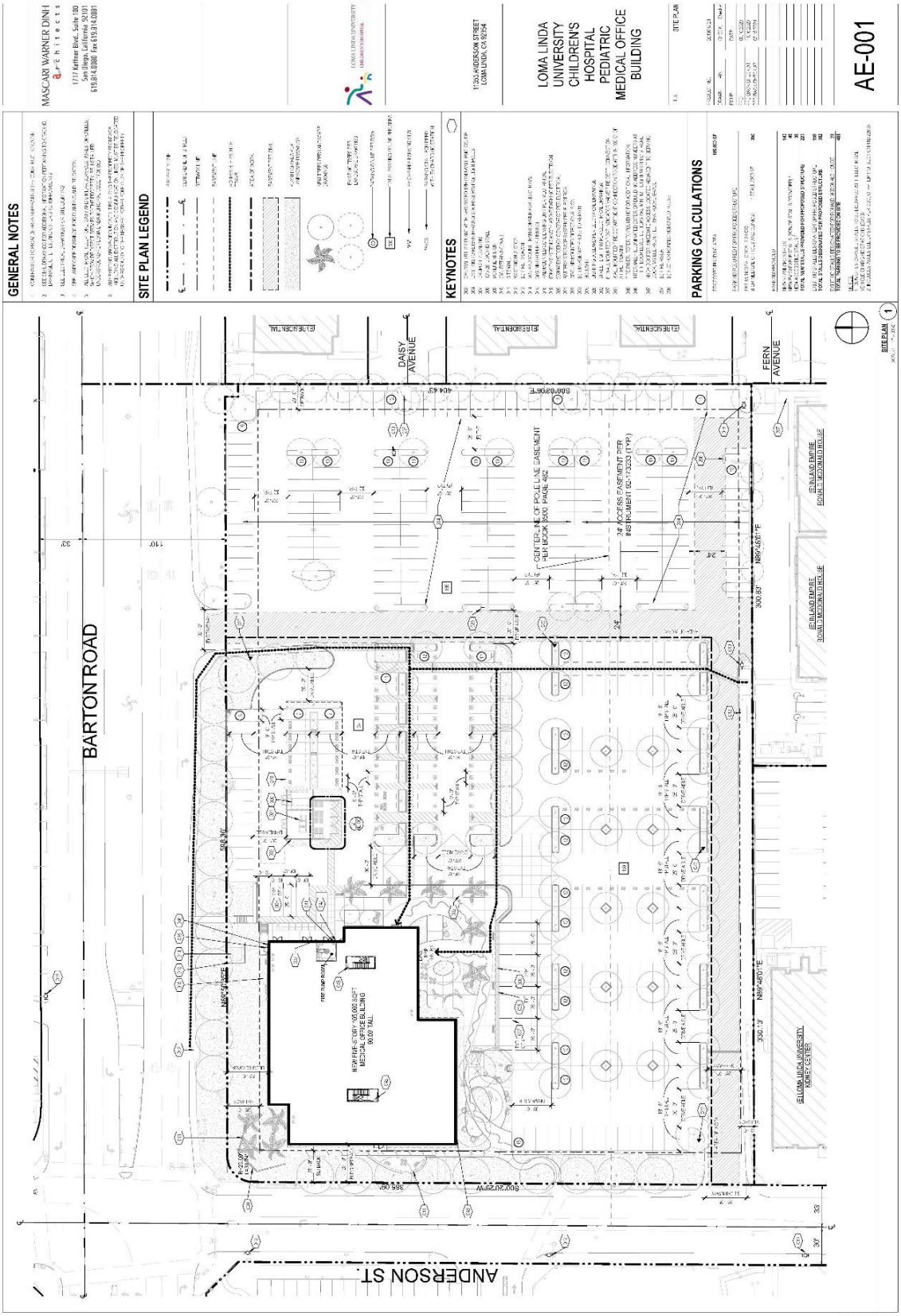


EXHIBIT 6 - PROJECT SITE PLAN

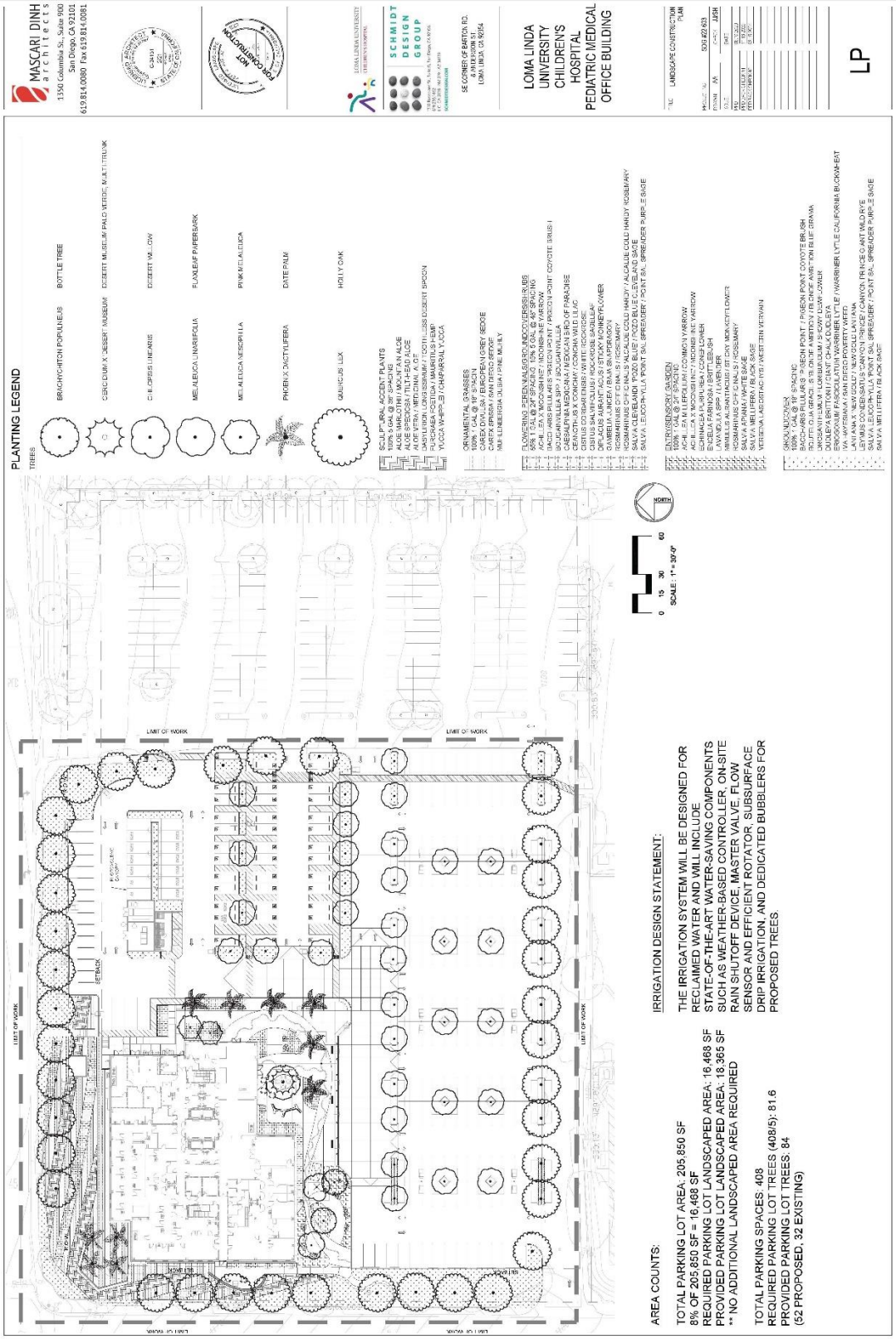
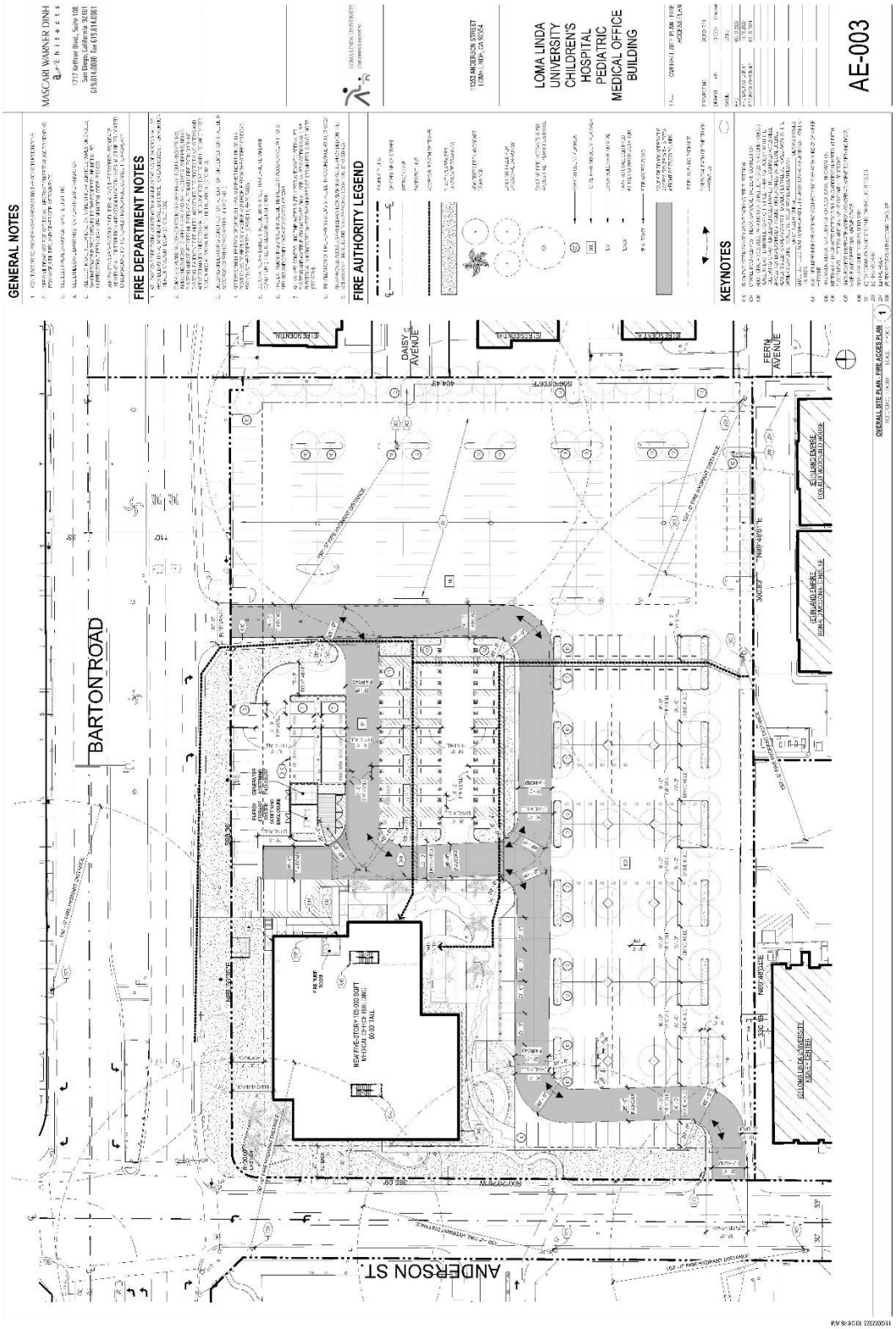


EXHIBIT 7 - LANDSCAPE PLAN



Source: Mascari Warner Dinh Architects

EXHIBIT 8 – FIRE ACCESS PLAN

Source: Mascari Warner Dinh Architects

EXHIBIT 9A – BUILDING RENDERING

Source: Mascari Warner Dinh Architects

EXHIBIT 9B - BUILDING ELEVATIONS

Source: Mascari Warner Dinh Architects

EXHIBIT 9C - BUILDING ELEVATIONS

EVALUATION FORMAT

This Initial Study is prepared in compliance with the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21000, et seq. and the State CEQA Guidelines (California Code of Regulations Section 15000, et seq.). Specifically, the preparation of an Initial Study is guided by Section 15063 of the State CEQA Guidelines. This format of the study is presented as follows. The project is evaluated based on its effect on 20 major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. **No Impact**: No impacts are identified or anticipated and no mitigation measures are required.
2. **Less than Significant Impact**: No significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. **Less than Significant Impact with Mitigation Incorporated**: Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List of mitigation measures)
4. **Potentially Significant Impact**: Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are (List of the impacts requiring analysis within the EIR).

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
☒	Although the proposed project could have a significant effect on the environment, there shall 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 shall be prepared.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	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.
☐	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.

Lorena Matarrita, Community Dev. Dir. — 12/5/2024

Signature:(Name , Supervising Planner) — Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and

    b) the mitigation measure identified, if any, to reduce the impact to less than a significant level.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
I.	***AESTHETICS*** – Except as provided in Public Resources Code Section 21099, would the project:				
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 a state scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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 will adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SUBSTANTIATION: *(Check ☐ if project site contains designated scenic resources or is located in proximity of any Scenic Route identified in the General Plan):*

Sources: City of Loma Linda General Plan and General Plan EIR; City of Loma Linda Municipal Code.

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

Impact discussion:
There are no designated scenic vistas in proximity to the Project Site. The San Bernardino Mountains, which are located to the north the City, form a prominent regional visual backdrop, along with the hills that form the southern edge of the City of Loma Linda. The Project Site is located in the central area of the City and would be integrated into the Loma Linda University Medical Center (LLUMC) campus both visually and functionally. Areas to the north, west and south of the Project site are also part of the LLUMC development. A single-family residential neighborhood is located adjacent to the project site on the east, but no homes are oriented toward the Project site. Thus, no views from this neighborhood would be affected by the Proposed Project. In consideration of these facts, the proposed Project would have no impact on a scenic vista and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) **Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?**

Impact discussion:
There are no designated scenic highways within the City of Loma Linda. The Project site is currently developed as a surface parking lot serving the LLUMC. There are no scenic resources: such as trees, rock outcroppings, or historic buildings located on the site or in proximity to it. In consideration of these facts, the proposed Project would have no impact on a scenic resource and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?**

Impact discussion:
As has been noted, the Project Site is part of the LLUMC campus, and is utilized presently as a surface parking lot. While the proposed medical office building would intensify development within the existing LLUMC campus, it would be architecturally consistent with the existing visual character as shown in Exhibits 3 and 8A - C in the Project Description. The Proposed Project does not require a General Plan Amendment or a Zone Change and does not conflict with regulations governing scenic quality. In consideration of these facts, the proposed Project would have no impact on a scenic resource and would not conflict with the General Plan or any other regulations pertaining to scenic quality and does not require a Zone Change. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
The proposed Project would intensify on-site development and create additional sources of light and glare for security lighting. As has been noted, the Project site is predominantly surrounded by similar office uses, with the exception of a single-family residential neighborhood located on the eastern boundary. No homes are, however, oriented toward the Project Site. As the site is planned, the area adjacent to the eastern boundary would remain as a surface parking lot, thus the change in the level of light and glare generated would be negligible**.** The design of lighting is regulated by Section 17.44.030 of the Loma Linda Municipal Code, which requires that lighting "shall be stationary and shall be directed away from adjacent properties and public rights-of-way", among other requirements. Compliance with the Municipal Code is a standard Condition of Project Approval. In consideration of these facts, the proposed Project would have a less than significant impact pertaining to the generation of light and glare, and no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Impact Conclusions - Aesthetics:
In consideration of the preceding information and analysis, no adverse aesthetic impacts are identified or are anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
II.	**AGRICULTURE AND FORESTRY 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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 the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Farmland Mapping and Monitoring Program - 2020, California Resources Agency; City of Loma Linda General Plan and Zoning Map.

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?**

Impact discussion:
The Project Site is designated on the 2020 California Important Farmland Map as "urban built-up land". As has been noted, the Project site is currently a paved surface parking lot. No agricultural uses would be affected by the Proposed Project. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
As noted in the Project Description, the Project Site is zoned I-HC for Institutional Health Care Land Use. No conflict with existing zoning for agricultural use, or a Williamson Act contract would occur as a result of the Proposed Project. No mitigation measures are necessary.

Level of Impact before Mitigation:

Level of Impact After Mitigation:

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))?**

Impact discussion:
The City of Loma Linda does not contain any forest or timberlands**.** No conflict with zoning for forest or timberlands would occur as a result of the Proposed Project. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
See Response II-c above. The City of Loma Linda does not contain any forest or timberlands**.** No loss of forest land or conversion of forest land to non-forest use would occur with the Proposed Project. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
See Responses II-c and d above. The City of Loma Linda does not contain any farm ar forest lands. The Proposed Project would not result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Agricultural Resources:
In consideration of the preceding information and analysis, no adverse impacts to either farmland or forest land are identified or are anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
III.	**AIR QUALITY -** Where available, the significance criteria established by the applicable air quality management district or air pollution control district should be relied upon to make the following determinations. Would the project:				
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?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: City of Loma Linda General and Zoning Map; "Loma Linda Medical Office Building Air Quality Impact Analysis", prepared by Urban Crossroads November 1, 2024, (See Appendix A)

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

Impact discussion:
The Project Site is located within the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) has jurisdiction over air quality monitoring and regulations. The proposed Project is a request for a Precise Plan of Design for a 105,000 square foot medical office building. The Project site occurs within the General Plan Land Use category "Institutional Health Care" (I-HC) and is designated I-HC on the City Zoning Map. These adopted land use and zoning designations are assumed in the preparation of the *South Coast Air Quality Management Plan.* The proposed Project is permitted within the I-HC Zone and will be required to comply with all pertinent regulations of the SCAQMD during construction and long-term operations. Consequently, the proposed project will not conflict with or obstruct the implementation of the South Coast Air Quality Management Plan and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
An analysis of air quality impacts has been prepared by the firm Urban Crossroads. Key information and conclusions are summarized herein.

Air pollution contributes to a wide variety of adverse health effects. The federal EPA has established National Area Air Quality Standards for six of the most common air pollutants: Carbon Monioxide (CO), Lead (Pb), Ozone $O_{3)}$, particulate matter (PM_{10} and $PM_{2.5}$), Nitrogen Dioxide ($NO_{2)}$, and Sulfur Dioxide ($SO_{2)}$ which are known as criteria pollutants. Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. The SCAQMD monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the SCAB. SCAB is in non-attainment status for ozone and particulate matter, meaning regional air quality does not meet state and/or federal air quality standards for these pollutants.

Table 3.0 illustrates local air quality at the closet air monitoring station, which is located approximately 6.5 miles east of the Project site. As shown, local air quality exceeded the 1-hour state ozone standard on 54 days during 2023, and the state/federal 8-hour standard on 83 days in 2023. Standards for other criteria pollutants were not exceeded by local air quality on any days in 2023.

Land uses such as the proposed Project affect air quality through construction-source and operational-source emissions. The latest version of the CalEEMod air quality model has been used to determine project related construction and operational air quality emissions. (Output from the model run for both construction and operational activity for the proposed Project is provided in Appendix A).

TABLE 3.0
PROJECT AREA EXISTING AIR QUALITY MONITORING SUMMARY
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Pollutant	Standard	Year		
		2021	2022	2023
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.145	0.135	0.143
Maximum Federal 8-Hour Concentration (ppm)		0.119	0.109	0.118
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	74	63	54
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	118	106	83
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.0	1.7	1.6
Maximum Federal 8-Hour Concentration	> 20 ppm	1.6	1.4	1.2
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.053	0.056
Annual Federal Standard Design Value		0.015	0.016	0.014
PM_{10}				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 150 µg/m^3	44	50	58
Annual Federal Arithmetic Mean (µg/m^3)		23.2	22.0	21.2
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m^3	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m^3	0	0	0
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration (µg/m^3)	> 35 µg/m^3	57.9	40.1	25.4
Annual Federal Arithmetic Mean (µg/m^3)	> 12 µg/m^3	11.9	11.26	10.16
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m^3	1	2	0

ppm = Parts Per Million
µg/m^3 = Microgram per Cubic Meter
Source: Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.}$: SCAQMD Air Quality Data Tables.
Table Source: *"Loma Linda Medical Office Building Air Quality Impact Analysis", prepared by Urban Crossroads November 1.2024,*

- **Construction Related Emissions**

Construction activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities: demolition, site preparation, grading, building construction, paving

use of architectural coatings, and on-road vehicle usage for workers, hauling, and vendors commuting to and from the site. The duration of construction activities and the mix of equipment utilized for construction also contribute to the level of air quality impact. A

duration of 12 months has been assumed in the analysis of the proposed Project. A typical array of construction equipment, including concrete/industrial saws, excavators, rubber-tired dozers, crawler tractors, graders, cranes, forklifts, generator sets, tractors, loaders, backhoes, welders, pavers, rollers, and air compressors have been assured for the proposed Project. (Please refer to Appendix A for detailed assumptions.)

CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions without mitigation are summarized in Table 4.0. Under the assumed scenarios, construction related emissions without mitigation will not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. It should be noted that the proposed Project must comply with all SCAQMD regulations to minimize air quality impacts during construction. Typical measures required under SCAQMD Rule 403 are described in Appendix A. In consideration of these facts, project related construction air quality impacts are considered less than significant.

TABLE 4.0
OVERALL PROJECT CONSTRUCTION EMISSIONS SUMMARY
LOMA LINDA PEDIATRIC MEDICAL BUILDING

Year	Emissions (lbs/day) [1]					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2025	4.13	37.54	33.79	0.07	7.82	4.52
2026	28.98	19.61	29.75	0.04	1.61	0.91
Winter						
2025	1.37	11.98	16.38	0.03	1.03	0.57
2026	28.96	19.65	28.77	0.04	1.61	0.91
Maximum Daily Emissions	**28.98**	**37.54**	**33.79**	**0.07**	**7.82**	**4.52**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: "Loma Linda Medical Office Building Air Quality Impact Analysis", prepared by Urban Crossroads November 1, 2024, CalEEMod construction-source (unmitigated) emissions, Appendix A..

- **Operational Emissions**

Operational activities associated with the proposed Project will result in emissions of VOCs, NOX, SOX, CO, PM10, and PM2.5. Operational emissions are expected from the following primary sources: area source emissions, energy source emissions, mobile source

emissions and stationary emissions. (Please refer to Appendix A for detailed assumptions on each of these contributing activities.)

Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site associated with the proposed uses. It should be noted that the proposed Medical Office Building would serve as an addition to the existing Loma Linda University Medical Center, increasing capacity to accommodate current patients and employees. Based on information provided by the Project Applicant, 50% of the trips associated with the proposed Medical Office Building are anticipated to be new. Accordingly, the CalEEMod default trip rates used in this analysis were reduced by 50% to reflect only the new traffic generated by the Project. Trip length characteristics available from the Loma Linda Medical Office Building Vehicle Miles Traveled (VMT) Analysis were utilized in this analysis. (See Transportation – Section XVII and Appendix F).

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. Peak emissions from operational activities for summer and winter scenarios are presented in Table 5.0. (Detailed operational model outputs are presented in Appendix A.) As illustrated, Project operational activities are not projected to exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. As such, operational impacts would be considered less-than-significant and no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant

TABLE 5.0
SUMMARY OF PEAK OPERATIONAL EMISSIONS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	6.75	5.47	51.29	0.12	10.67	2.77
Area Source	3.15	0.04	4.57	0.00	0.01	0.01
Energy Source	0.04	0.77	0.65	0.00	0.06	0.06
Stationary Source	1.15	3.21	2.93	0.01	0.17	0.17
Total Maximum Daily Emissions	**11.09**	**9.49**	**59.43**	**0.13**	**10.91**	**3.00**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	6.27	5.87	43.65	0.11	10.67	2.77
Area Source	2.40	0.00	0.00	0.00	0.00	0.00
Energy Source	0.04	0.77	0.65	0.00	0.06	0.06
Stationary Source	1.15	3.21	2.93	0.01	0.17	0.17
Total Maximum Daily Emissions	**9.86**	**9.86**	**47.23**	**0.12**	**10.90**	**2.99**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod operational-source emissions are presented in Appendix 3.1.

c) **Expose sensitive receptors to substantial pollutant concentrations?**

Impact discussion:
Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as “sensitive receptors”. These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. Any adjacent land use where an individual could remain for 1 or 8-hours, that is located at a

closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must also be considered to determine construction and operational air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8-hours.

Sensitive receptors relative to the Project area are described below and shown on Exhibit 10. Localized air quality impacts were evaluated at receptor land uses nearest the Project site.

- R1: Location R1 represents an existing residence at 24946 Barton Road located roughly 164 feet north of the Project site.
- R2: Location R2 represents an existing residence at 25010 Daisy Avenue located roughly 47 feet east of the Project site.
- R3: Location R3 represents an existing residence at 25010 Fern Avenue located roughly 51 feet east of the Project site.
- R4: Location R4 represents the existing Ronald McDonald House Charity House at 11365 Anderson Street located roughly 33 feet south of the Project site.
- R5: Location R5 represents an existing residence at 24934 Tulip Avenue located roughly 151 feet south of the Project site.
- R6: Location R6 represents an existing Loma Linda University Kidney Center at 11375 Anderson Street located roughly 16 feet south of the Project site.

Table 6.0 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Without mitigation, localized construction emissions would not exceed the applicable SCAQMD Localized Significance Threshold (LST) for emissions of any criterial pollutant. Consequently, impacts to sensitive receptors from construction activities are considered less than significant and no mitigation is necessary. (Outputs from the model runs for unmitigated construction LSTs are provided in Appendix A.)

TABLE 6.0
LOCALIZED CONSTRUCTION-SOURCE EMISSIONS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	**Maximum Daily**	**22.20**	**19.92**	**2.58**	**1.10**
	SCAQMD Localized	118	775	4	4
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation	**Maximum Daily**	**37.46**	**32.43**	**7.59**	**4.46**
	SCAQMD Localized	220	1,625	11	7
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	**Maximum Daily**	**20.64**	**19.61**	**3.40**	**1.99**
	SCAQMD Localized	187	1,324	8	6
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads "Loma Linda Medical Office Building Air Quality Impact Analysis", prepared by Urban Crossroads November 1, 2024, CalEEMod unmitigated localized construction-source emissions are presented in Appendix A).

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed medical office building does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed. Additionally, the Project traffic would not create or result in a CO "hotspot." Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations. In consideration of these facts, potential operational related air quality impacts to sensitive receptors are considered less than significant, and no mitigation measures are necessary

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant

EXHIBIT 10.0
SENSITIVE AIR QUALITY RECEPTORS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Source: Urban Crossroads "Loma Linda Medical Office Building Air Quality Impact Analysis", prepared by Urban Crossroads November 1, 2024

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

Impact discussion:
Land uses generally associated with odor complaints include: agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies and fiberglass molding facilities. The Project does not propose any activities typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may, however, result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operations. Standard construction requirements would minimize odor impacts from construction. In addition, such emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction and are thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. In consideration of these facts, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Air Quality:
In consideration of the preceding information and analysis, no adverse impacts related to air quality have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IV.	**BIOLOGICAL RESOURCES -** Would the project:				
a)	Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Project Application Materials. City of Loma Linda General Plan EIR.

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

Impact discussion:
The project site is currently developed with a surface parking lot, as shown in Exhibit 3 - Project Site and Vicinity. There is no natural habitat present on-site or in adjacent areas. Introduced perimeter landscaping forms the only habitat present. Consequently, there will be no impacts to any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
The project site is currently developed with a surface parking lot as shown in Exhibit 3 - Project Site and Vicinity. There is no riparian habitat or any other sensitive natural community present on-site or in adjacent areas. Consequently, there will be no impacts to riparian habitat or other sensitive natural communities. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
The project site is currently developed with a surface parking lot as shown in Exhibit 3 – Project Site and Vicinity. There are no wetlands of any kind on-site or in adjacent areas. Consequently, there will be no impact to wetlands. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact discussion:
The project site is currently developed with a surface parking lot as shown in Exhibit 3 – Project Site and Vicinity. There are no migratory fish or wildlife corridors of any kind on-site or in adjacent areas. Consequently, there will be no impact to migratory species. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
As has been noted, the project site is currently developed with a surface parking lot bordered by introduced landscaping, including a variety of trees.as shown in Exhibit 3 - Project Site and Vicinity and Exhibits 5A-D: Site Photographs. The City of Loma Linda Municipal Code Chapter 17.74 “Tree Placement, Landscape Materials, and Tree Removal” outlines local policies and ordinances regulating landscape development. Per Ordinance 17.74.180 the Applicant has prepared a preliminary landscape plan which is illustrated in Exhibit 7 – Landscape Plan, and Exhibits 9A-C, which provide artist’s renderings of the proposed project. Compliance with the Municipal Code is a standard Condition of Project Approval. In consideration of these facts, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance,

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact discussion:
There are no adopted Conservation Plans, Natural Community Conservation Plans, or other approved local, regional or state habitat conservation plans applicable to the Project Site. No conflicts would occur and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Biological Resources:
In consideration of the preceding information and analysis, no adverse impacts to biological resources have been identified or are anticipated, and no mitigation measures are required.

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
V.	**CULTURAL RESOURCES** - Would the project:				
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 outside of formal cemeteries?	☐	☒	☐	☐

SUBSTANTIATION:

Sources: "Cultural Resources Report for the Loma Linda University Children's Hospital Pediatric Medical Office Building Project, Loma Linda, San Bernardino County, California", by BCR Consulting, September 2024 (contained in Appendix B); City of Loma Linda General Plan EIR, Section 4.5.2- Cultural Resources, prepared by LSA Associates, 2004. .

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

Impact Discussion:
Section 15064.5 of CEQA Guidelines pertains to procedures for determining the significance of impacts to archaeological and historical resources. Per Section 15064.5 a "historical resource" is a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources, or a resource included in a local register of historical resources or identified as significant in an historical resource survey. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

The Project site is presently occupied by a paved surface parking lot. No structures of any kind are located on-site. The definition of a "historical resource" as outlined in CEQA Guidelines Section 15064.5, thus, does not apply to the Project site. No impact to historical resources will occur and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.
.

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

Impact Discussion:

A Cultural Resources Assessment was conducted in September 2024, by ELMT Consulting of the proposed Project site to evaluate possible impacts on archaeological resources and is contained in Appendix B to this Initial Study. Records research indicated that 22 cultural resources have been recorded one mile of the project site, and although a past assessment was conducted on the Project site itself, no cultural resources were identified. In addition, no significant cultural resources were identified within one mile of the Project site.

The Loma Linda General Plan EIR (2004) identified the Project area as having a "Low Potential" for paleontological sensitivity, although adjacent area (generally incorporating the LLUMC) was considered to have an "undetermined potential". Excavation, grading and other site preparation activities could have some potential to expose unknown archaeological and paleontological resources. Consequently, the Mitigation Measures outlined below are required. With compliance to Mitigation Measures CUL-1 and CUL-2 below, potential impacts to archaeological resources would be less than significant.

Level of Impact before Mitigation: Potentially Significant.

Mitigation Measures:

Mitigation Measure CUL-1: *If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease until a qualified archaeologist meeting Secretary of Interior standards is hired to assess the find and resources are recovered and/or recorded. 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 regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, in order to provide Tribal input with regards to potential significance and treatment.*

Mitigation Measure CUL-2: *If significant pre-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan and any resources collected shall be curated with an appropriate reposition. This plan shall be provided to Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) in its draft form for review and comment. The archaeologist shall monitor the remainder of the project and implement the Monitoring and Treatment Plan accordingly. A final report shall be filed with the City Planner documenting any archaeological resources found and their disposition.*

Level of Impact After Mitigation: Less than Significant, with compliance to Mitigation Measures CUL-1 and CUL-2.

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

Impact Discussion:

No cultural resources were identified within the project site during the Cultural Resources Assessment and records search and no significant historical resources have been identified within one mile of the project. Furthermore, the project site has been subject to a previous cultural resources assessment with negative findings. City Planning staff notified area Native American tribes recommended by the Native American Heritage Commission and received one reply from the Yuhaaviatam of San Manuel Nation, who expressed interest in the Proposed Project and requested mitigation language outlined below although no known cultural resources were identified. Based on this information, the project site is not considered sensitive for buried cultural resources. In the unlikely event that unknown human remains are encountered during site preparation activities Mitigation Measure CUL- 3 will ensure that impacts are less than significant.

Level of Impact before Mitigation: Potentially Significant.

Mitigation Measures:

Mitigation Measure CUL-3: *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. A report shall be filed with the City Planner documenting any human remains or funerary objects found and their disposition.*

Level of Impact After Mitigation: Less than Significant with compliance to Mitigation Measure CUL-3.

Summary Conclusions – Cultural Resources:
In consideration of the preceding information and analysis, no adverse impacts to cultural resources have been identified or are anticipated that cannot be mitigated to a less than significant level with identified mitigation measures.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
VI.	**ENERGY** – Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Project Application Materials.

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

Impact Discussion:
Construction of the proposed Project would require the typical use of energy resources. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities. Construction activities are required to comply with applicable California Air Resources Board (CARB) regulations regarding retrofitting, repowering, or replacement of diesel construction equipment. In addition, the California Code of Regulations, Title 13, Motor Vehicles, Section 2449(d)(3) limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Compliance with these measures would minimize or eliminate wasteful or unnecessary consumption of energy during construction.

Operational energy use in buildings includes energy consumed by the built environment and energy consumed by devices such as diagnostic equipment and both indoor and outdoor lighting. Section 17.72.110 of the Loma Linda Municipal Code requires that all projects be designed to "fully comply with all energy conservation features and materials required by all current state and local requirements". The California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. The proposed Project is required to comply with Title 24 standards which require, among other measures, that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The Project must also comply

with the CALGreen Code which is part of Title 24. Among the features the proposed project incorporates that would further contribute to minimizing energy consumption are:

- Provision for 45 reserved parking spaces for electric vehicles (EVs);
- Provision of 11 EV charging stations;
- Provision of bicycle racks;
- Participation in the LLUMC Ridesharing Program;
- Proximity to an established bus transit stop (adjacent on Barton Road); and
- An energy efficient lighting plan in compliance with the Loma Linda Municipal Code.

With compliance to existing regulations, the proposed project is not anticipated to result in the wasteful, inefficient, or unnecessary consumption of energy resources. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than significant.

Level of Impact After Mitigation: Less than significant.

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

The current Institutional Health Care (I-HC) classification on the project site is consistent with the Loma Linda General Plan and Zoning Map. As such, the energy demands of the Project would be accommodated within the context of the planned availability of resources and energy delivery systems by City and regional planning documents. No conflict with or obstruction of a state or local plan for renewable energy or energy efficiency is anticipated. No mitigation is necessary.

Level of Impact before Mitigation: No impact.

Level of Impact After Mitigation: No impact.

Summary Conclusions – Energy:

In consideration of the preceding information and analysis, no adverse impacts with respect to energy have been identified or are anticipated, and no mitigation measures are necessary.

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

SUBSTANTIATION:

Sources: Loma Linda General Plan EIR, Chapter 4.6 - Geology and Soils, 2004; Loma Linda Municipal Code; "Geotechnical Engineering Report - Proposed Children's Clinics Outpatient Pavilion, SEC of Barton Road and Anderson Street, Loma Linda, San Bernardino County, California" December 2022, prepared by Terracon Consultants, Inc, as contained in Appendix C.

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.

Impact Discussion:
Four faults are located within the City limits. They include the San Jacinto Fault, the Loma Linda Fault, the Banning Fault, and the Reche Canyon Fault. The San Jacinto Fault zone crosses the southwest portion of the City and has been one of the most historically active fault zones in Southern California. The site is not located within an Alquist-Priolo Earthquake Fault Zone based on review of the State Fault Hazard Maps. Therefore, the Proposed Project would not risk the loss, injury, or death involving the 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, or from strong seismic ground shaking. Furthermore, the medical office building must be designed to comply with seismic standards set forth by the California Building Code (CBC) and Loma Linda Municipal Code. With compliance to existing regulations, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

ii. Strong seismic ground shaking?

Impact Discussion:
The site is located in the seismically active southern California area. The type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event. As calculated using the USGS Unified Hazard Tool, the San Jacinto (San Bernardino segment) Fault, which is considered to have the most significant effect at the site, has a maximum earthquake magnitude of 8.01 and is located approximately 0.83 kilometers from the site. No active faults were mapped transecting the Project site. There are, however, several mapped faults in the area capable of strong seismic ground shaking as outlined in Response VII-a,i. above.

The investigation conducted by Terracon Consultants, Inc, which provides a general characterization of subsurface soil and geotechnical conditions, concluded that the Project site is suitable for the construction proposed. Recommendations for the design of foundation systems, site preparation, excavation, subgrade preparation and placement of engineered fills on the project site were made. (Please refer to Appendix C for additional information.)

The Loma Linda Municipal Code and standard Conditions of Approval require compliance with recommendations of geotechnical investigations, which must be approved by the City prior to issuance of building permits, and all applicable requirements of the California Building Code (CBC) pertaining to seismic design. These measures would ensure that potential ground shaking impacts are reduced to the maximum extent possible. With compliance to recommendations of the project geotechnical investigation and the CBC, no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

iii. Seismic-related ground failure, including liquefaction?

Impact Discussion:
Liquefaction is a mode of ground failure that results from the generation of high pore-water pressures during earthquake ground shaking, causing loss of shear strength, and is typically a hazard where loose sandy soils exist below groundwater. San Bernardino County has designated certain areas as potential liquefaction hazard zones. These are areas considered at a risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the presence of a relatively shallow water table.

The subsurface materials on-site generally consist of Interbedded layers of silty clayey sand, clayey sand, well graded sand with varying amounts of silt and gavel, silty clay, and silty sand extending to the maximum depth of the explorations, approximately 75 feet below ground surface (bgs). Groundwater seepage was not observed within the maximum depths of exploration during or at the completion of drilling and has historically been greater than 50 feet bgs. According to the County of San Bernardino geologic hazard maps and the General Plan EIR, the Project site is not within an area identified as having liquefaction potential. Consequently, potential Impacts from seismic-related ground failure, including liquefaction are considered less than significant and no mitigation measures are necessary.

Level of Impact before Mitigation: Less than significant.

Level of Impact After Mitigation: Less than Significant.

iv. Landslides?

Impact Discussion:

The topography of the Project site is essentially level, and the site is not surrounded by any slopes. Consequently, no potential for landslides exists on the site and no mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:
The investigation conducted by Terracon Consultants, Inc, which provides a general characterization of subsurface soil and geotechnical conditions, concluded that the Project site is suitable for the construction proposed. Recommendations for the design of foundation systems, site preparation, excavation, subgrade preparation and placement of engineered fills on the project site were made. (Please refer to Appendix C for additional information.)

During the construction of the proposed Project, dust may be generated due to the operation of machinery on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. The proposed Project would disturb more than one acre of soil; therefore, is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ)

Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs in an approved SWPPP would ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. A Preliminary SWPPP has been prepared by the project applicant and is discussed Section X - Hydrology and Water Quality. With approval of the project SWPPP by the City's Public Works Department prior to the issuance of grading permits, no significant adverse from soil erosion are anticipated, and no mitigation measures are required.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Impact Discussion:
The investigation conducted by Terracon Consultants, Inc, which provides a general characterization of subsurface soil and geotechnical conditions, concluded that the Project site is suitable for the construction proposed. As has been described in prior Responses VII-a, iii and iv respectively, there is no potential for landslides on-site and the potential for liquefaction is considered very low.

Terracon Consults, Inc also examined the potential for seismically induced settlement and estimated it to potentially be 6½ to 9½ inches. Differential seismic settlement was estimated to potentially be 2 to 3 inches total over a distance of 50 feet. Recommendations for the design of foundation systems, site preparation, excavation, subgrade preparation and placement of engineered fills on the project site were by Terracon to address soil conditions, including potential lateral spreading and subsidence. (Please refer to Appendix C for detailed information.)

The Loma Linda Municipal Code and standard Conditions of Approval require compliance with recommendations of geotechnical investigations, which must be approved by the City prior to issuance of building permits, and all applicable requirements of the California Building Code (CBC). These measures would ensure that potential impacts from lateral spreading, and subsidence are less than significant. With compliance to recommendations of the project geotechnical investigation and the CBC, no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
Expansive soils are those soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). When these soils shrink or swell, the change in volume exerts significant pressures on loads (such as buildings) that are placed on them. Terracon Consultants identified subsurface materials as generally consisting of Interbedded layers of silty clayey sand, clayey sand, well graded sand with varying amounts of silt and gavel, silty clay, and silty sand extending to the maximum depth of the explorations approximately 76 feet below ground surface. Recommendations for the design of foundation systems, site preparation, excavation, subgrade preparation and placement of engineered fills on the project site were by Terracon to address soil conditions, including potential soil expansion. (Please refer to Appendix C for detailed information.)

The Loma Linda Municipal Code and standard Conditions of Approval require compliance with recommendations of geotechnical investigations (which must be approved by the City prior to issuance of building permits) and all applicable requirements of the California Building Code (CBC). These measures would ensure that potential impacts from potential expansive soils are less than significant. With

compliance to recommendations of the project geotechnical investigation and the CBC, no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
No septic tanks or alternative wastewater disposal is proposed. Upon approval of the Proposed Project, the MOB would connect to the City's sewer collection system that currently serves the immediate vicinity. No impacts from soils incapable of adequately supporting septic tanks or alternative wastewater disposal systems would result.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:
There are no unique geologic features existing on the project site. Potential impacts to paleontological resources are addressed in Section V- Cultural Resources. The Loma Linda General Plan EIR (2004) identified the Project area as having a "Low Potential" for paleontological sensitivity, although adjacent area (generally incorporating the LLUMC) was considered to have an "undetermined potential". Excavation, grading and other site preparation activities could have some potential to expose unknown archaeological and paleontological resources. Consequently, Mitigation Measures CUL-1, CUL-2 and CUL-3 outlined in Section V (b) have been required. With these measures, potential impacts to paleontological resources would be less than significant

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions – Geology and Soils:
In consideration of the preceding information and analysis, no adverse impacts to, or from, geology and soils have been identified or are anticipated, and no mitigation measures are required.

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
VIII.	**GREENHOUSE GAS EMISSIONS – Would the project:**				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

SUBSTANTIATION: *Source : Urban Crossroads, "Loma Linda Medical Office Building Greenhouse Gas Analysis", December 2024. (See Appendix D.)*

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

Impact Discussion:
A comprehensive analysis of project related greenhouse gas impacts has been prepared by the firm Urban Crossroads. Key information and conclusions are summarized herein. Please refer to Appendix D for discussion of methodology, regulatory setting, GHG emissions inventories and other detailed information.

Many gases make up the group of pollutants which contribute to global climate change. However, three gases are currently evaluated and represent the highest concentration of GHG: Carbon dioxide (CO2), Methane (CH4), and Nitrous oxide (N2O). The South Coast Air Quality Management District (SCAQMD) provides guidance methods and/or emission factors that are used for evaluating a project's emissions in relation to greenhouse gas thresholds. The specific criteria used to determine the significance of potential Project-related GHG impacts are taken from the CEQA Guidelines Initial Study Checklist - Appendix G. in addition, CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- Consideration #1: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.

- Consideration #2: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

- Consideration #3: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In

> determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

The City of Loma Linda has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO2e/yr (Metric Ton of Carbon Dioxide Equivalent/Year) to determine if additional analysis is required is an acceptable approach for relatively small projects such as the proposed Project. This approach is a widely accepted screening threshold used by the City of Loma Linda and numerous cities in the South Coast Air Basin (SCAB) and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The latest version of CalEEMod has been used to determine project related GHG emissions. Output from the model runs for construction and operational activity for the proposed Project is provided in Appendix D. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, refrigerants, and stationary sources.

- **Construction related GHG emissions**

Project construction activities would generate CO2 and CH4 emissions. Construction related emissions are expected from the following construction activities: demolition, site preparation, grading, building construction, paving and use of architectural coatings. For the purposes of analysis, construction of the proposed Project is assumed to commence in April 2025 and last through April 2026. Per typical construction practices, each piece of equipment has been assumed to operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City of Loma Linda Municipal Code pertaining to construction activities. Please refer to Appendix D for additional information on project construction assumptions.

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (54). As such ,construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 7.0

TABLE 7.0
AMORTIZED ANNUAL PROJECT RELATED CONSTRUCTION GHG EMISSIONS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[4]
2025	368.81	0.02	0.02	0.14	374.02
2026	149.99	0.01	0.00	0.05	151.43
Total GHG Emissions	518.80	0.03	0.02	0.19	525.45
Amortized Construction Emissions	**17.29**	**8.44E-04**	**6.52E-04**	**6.17E-03**	**17.51**

Source: CalEEMod annual construction-source emissions are presented in Appendix D.

- **Operational Project Related GHG Emissions**

Operational activities associated with the Project will result in emissions of CO2, CH4, N2O and Refrigerants from the following primary sources: area source emissions, energy source emissions, mobile source emissions, stationary source emissions, water supply, water treatment, and distribution, solid waste generation, and refrigerants. Project related operational air quality emissions derive primarily from vehicle trips generated including employee trips to and from the site. It should be noted that the proposed Medical Office Building would serve as an addition to the existing Loma Linda University Medical Center, increasing capacity to accommodate current patients and employees. Based on information provided by the Project Applicant, 50% of the trips associated with the proposed Medical Office Building are anticipated to be new. Accordingly, the CalEEMod default trip rates used in this analysis were reduced by 50% to reflect only the new traffic generated by the Project. Trip length characteristics available from the Loma Linda Medical Office Building Vehicle Miles Traveled (VMT) Analysis (Appendix D were utilized in this analysis. Please refer to Appendix D for assumptions pertaining to other sources of operational emissions including stationery sources; water supply, treatment and distribution; solid waste generation; and use of refrigerants.

- **GHG Emissions Summary**

The annual GHG emissions associated with the Project are summarized in Table 8.0. As shown, construction and operation of the Project would generate approximately 2,382.07 MTCO2e/yr. As such, the Project would not exceed the SCAQMD's recommended numeric threshold of 3,000 MTCO2e/yr if it were applied. Thus, project-related emissions would have a less than significant direct or indirect impact on GHG and climate change and no mitigation measures are required.

TABLE 8.0
SUMMARY OF PROJECT RELATED GHG EMISSIONS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	17.29	8.44E-04	6.52E-04	6.17E-03	17.51
Mobile Source	1487.67	0.08	0.08	2.30	1514.91
Area Source	2.13	0.00	0.00	0.00	2.14
Energy Source	445.60	0.04	0.00	0.00	447.73
Water Usage	18.51	0.43	0.01	0.00	32.34
Waste	101.18	10.11	0.00	0.00	354.01
Refrigerants	0.00	0.00	0.00	0.06	0.06
Stationary Source	13.33	0.00	0.00	0.00	13.37
Total CO_2e (All Sources)	**2,382.07 MTCO2e/yr**				

Source: CalEEMod output, See Appendix D for detailed proposed Project model outputs.

Level of Significance before Mitigation: Less than Significant

Level of Significance after Mitigation: Less than Significant.

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

Impact Discussion:
As demonstrated in the preceding discussion of project related GHG emissions, no significant impacts are anticipated. Thus, the Project would not impede the State's progress towards carbon neutrality by 2045 under the California Air Resources Control Board (CARB) 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard.

Level of Impact Before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Greenhouse Gas Emissions:
In consideration of the preceding information and analysis, no adverse impacts pertaining to greenhouse gas emissions have been identified or are anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
IX.	**HAZARDS AND HAZARDOUS MATERIALS –** Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: *Project Application Materials; California Department of Toxic Substances Control, Envirostor online database; City of Loma Linda Hazard Mitigation Plan City of Loma Linda, General Plan, Safety Element, 2021; Federal Emergency Management Agency (FEMA)-Flood Insurance Rate Map, August 2008. . , ,*

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

Impact Discussion:
Construction of the MOB would involve short-term use of petroleum-based fuels, lubricants, and other similar materials. The construction phase may also include the transport of gasoline and diesel fuel to the Project Site and onsite storage for the sole purpose of fueling construction equipment. Long -term operation of the proposed MOB would involve routine periodic use of pesticides, herbicides and fertilizers typically associated with landscape maintenance, A limited amount of bio-medical waste generation can also be anticipated with long term operations, in addition to routine use of cleaning solvents and similar substances associated with property maintenance necessary to a medical facility.

No activities using or generating an unusual amount of hazardous substances are anticipated. The transport, handling, use and disposal of any hazardous substances must comply with all federal, state and local laws regulating their management and use. Consequently, potential impacts related to creating a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials are considered less than significant. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

b) **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Impact Discussion:
Limited amounts of bio-medical and other medical wastes would be generated at the MOB as part of the day-to-day operations. The waste materials would not create a significant hazard to the public because they would be handled and disposed of in accordance with applicable regulations. Other aspects of the proposed project, as has been noted, would utilize common products for cleaning and maintenance. No activities that would involve the use of explosive, acutely toxic or caustic substances that could result in accident or upset conditions are anticipated. Consequently, the risk of accidental release of hazardous materials is considered less than significant, and no mitigation measures beyond compliance with applicable regulations are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The only educational facility located within a quarter-mile of the Project site is Loma Linda University, located on Barton Road opposite the Project site. Implementation of the proposed Project would not emit hazardous emissions or involve the handle hazardous or acutely hazardous materials, substances, or waste that would be a potential threat to the university. Consequently, no impacts to schools would result.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
Pursuant to California Government Code Section 65962.5, the California Department of Toxic Substances Control (DTSC) compiles the Cortese List and updates it at least annually. The Cortese List includes hazardous waste facilities subject to corrective actions, land designated as hazardous waste property or border zone property, sites included in the abandoned site assessment program, and qualifying sites pursuant to Section 25356 of the Health and Safety Code.

The Project Site is currently occupied by a surface parking lot and is not listed on any official list of hazardous materials sites. The DTSC EnviroStor online database was examined and the Project site is not identified on the list. Consequently, no impact related to Government Code Section 65962.5 is anticipated.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. No impacts related to airport safety hazards or excessive noise exposure are anticipated. No mitigation measures are necessary**.**

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:
The City of Loma Linda Fire Department maintains and implements a Hazard Mitigation Plan as required by State Law. The Plan includes ongoing emergency response coordination with surrounding jurisdictions, including the County of San Bernardino, and a public awareness program among other features.

The Safety Element of the Loma Linda General Plan indicates that Barton Road, as one of the two major east-west roadways in the City, is a designated evacuation route. A Fire Access Plan, which must be approved by the Loma Linda Fire Department, is a component of the proposed project and is illustrated in Exhibit 8.

No physical alteration of the adjoining streets (Barton Road and Anderson Street) is proposed with the Project, thus no impacts to its function as an evacuation route are anticipated. In consideration of these facts, the proposed Project is not anticipated to adversely affect any aspect of an adopted emergency response plan or an emergency evacuation plan. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:
The central portion of the City of Loma Linda in which the proposed Project is suburban in character. The City's Hazard Mitigation Plan designates the area as a moderate risk for wildland fires due to the proximity of hilly undeveloped land to the south of the City. All new developments must comply with the California Building Code and California Fire Code. As has been noted, the proposed Project incorporates a Fire Access Plan that must be reviewed and approved by the City of Loma Linda Fire Department. The City has thus a prepared strategy to deal with wildland fire risks to the extent that is possible. In consideration of these facts, no significant wildland fire risks are presented by the proposed project and no mitigation measures beyond compliance with existing regulations are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions - Hazards and Hazardous Materials:
In consideration of the preceding information and analysis, no adverse impacts related to hazards and hazardous materials have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
X.	**HYDROLOGY AND WATER QUALITY -** Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
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 offsite;	☐	☐	☒	☐
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: "Water Quality Management Plan - Loma Linda University Children's Medical Office Building", Goodman & Associates, August 2023; "Erosion Control Plan", Goodman & Associates, July 2024: "City of Loma Linda Water Shortage Contingency Plan", prepared by Water Systems Consultants, Inc. April 2021;

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

Impact Discussion:
The Proposed Project would disturb approximately 3.6 acres and is therefore subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

A SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. The SWPPP must include BMPs so that construction of the Project would not pollute surface waters. BMPs may include, but are not limited to street sweeping of paved roads around the Project Site during construction, and the use of sandbags or similar measures to control erosion during storm events. BMPs may also include:

- Requiring contractors to avoid applying materials during periods of rainfall and protect freshly applied materials from runoff until dry.
- Requiring contractors to contract with a local waste hauler or ensure that waste containers are emptied weekly. Waste containers cannot be washed out on-site.
- Disposal of all waste in accordance with local, state and federal regulations.
- Requiring all construction equipment and vehicles to be serviced off-site.

Compliance with existing regulations would reduce the potential for stormwater discharges during grading and construction to a less than significant level and ensure that the proposed Project does not violate any water quality standards or waste discharge requirements.

Level of Impact before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant

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

Impact Discussion:
The Proposed Project will receive water from the City of Loma Linda. The City of Loma Linda's water production division provides water from six production wells. Loma Linda's main water source is ground water within the Bunker Hill Basin, which is primarily replenished by snow melt from the nearby San Bernardino Mountains. Based on

analysis conducted by the City of Loma Linda Public Works Department, the local water supply is considered sufficient to meet projected demand without implementing restrictive measures. The project site is consistent with the General Plan and existing zoning, thus development of the site for a health care facility has been considered in the City's water planning programs. The type of development proposed (medical office) is also not considered a large water consumer relative to other land uses such as residential land uses.

Should extended drought conditions occur, however, the City has prepared a water shortage contingency plan (WSCP), which is available for review on the City's website under the Public Works Department. This plan regularly assesses and monitors the City's ability to provide sufficient water supply and to maintain water quality during normal conditions as well as throughout extended drought conditions. If necessary, the City also has the ability to draw emergency supplemental water supply from the adjacent cities of Redlands and San Bernardino. The WSCP also outlines "demand reduction actions" that the city can implement if conditions warrant. These include measures such as limiting landscape irrigation, use of potable water for washing hard surfaces, limiting service of water in restaurants, requiring evaporation covers on pools, restricting water use for decorative water features and similar actions. In consideration of these facts, the proposed project is not anticipated to result in any substantial impacts to groundwater supplies or recharge and it would not impede sustainable groundwater basin management. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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;

Impact Discussion:
See Response X-a) above. The Proposed Project would disturb approximately 3.6 acres and is therefore subject to the National Pollution Discharge Elimination System (NPDES) permit requirements. The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-

storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

During the construction of the proposed Project, dust may be generated due to the operation of machinery on-site or during high winds. Additionally, erosion of soils could occur due to a storm event. The proposed Project would disturb more than one acre of soil; therefore, is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation.

The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices (BMPs) to avoid and minimize soil erosion. Adherence to BMPs in an approved SWPPP would ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. A Preliminary SWPPP has been prepared by the project applicant and must be approved by the City Public Works Department prior to issuance of grading permits. With compliance to the requirements of a SWPPP, no significant adverse from soil erosion are anticipated, and no mitigation measures are required.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;

Impact Discussion:
The FEMA Flood Rate Insurance Program Map (FIRM) for the local area dated August 28, 2008, indicates that the Project Site lies within an unshaded Zone “X” floodplain. Unshaded Zone “X” is defined as “areas determined to be outside the annual 2% chance floodplain. The project site is presently developed as a paved surface parking lot with very limited permeable area. The proposed medical office building and related surface parking will not substantially alter the amount of permeable area although minor changes in drainage patterns would occur to accommodate the medical office building.

The proposed Project application includes a preliminary Drainage Plan and a Grading Plan which incorporate features to direct and control surface run-of. Both plans must be approved by the City Public Works Department prior to the issuance of grading permits. With compliance to existing regulations, no significant change in the amount or rate of surface run-off is anticipated, and no mitigation measures are required.

Level of Impact before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff;

Impact Discussion:
See Responses X-a) and c) I and ii above**.** No significant change in the sources, amount or rate of surface run-off are anticipated as a result of the proposed Project. The proposed Project application includes a preliminary Drainage Plan and a Grading Plan which incorporate features to direct and control surface run-off. Both plans must be approved by the City Public Works Department prior to the issuance of grading permits. With compliance to existing regulations, no adverse impacts to existing and planned stormwater drainage systems are anticipated. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Iv. impede or redirect flood flows?

Impact Discussion:
The FEMA Flood Rate Insurance Program Map (FIRM) for the local area dated August 28, 2008, indicates that the Project Site lies within an unshaded Zone "X" floodplain. Unshaded Zone "X" is defined as "areas determined to be outside the annual 2% chance floodplain. The project site is presently developed as a paved surface parking lot with very limited permeable area. The proposed medical office building and related surface parking will not substantially alter the amount of permeable area although minor changes in drainage patterns would occur to accommodate the medical office building.

The proposed Project application includes a preliminary Drainage Plan and a Grading Plan which incorporate features to direct and control surface run-off. Both plans must be approved by the City Public Works Department prior to the issuance of grading permits. With compliance to existing regulations, no adverse impacts to existing and planned stormwater drainage systems are anticipated. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
As has been noted the project site lies within an unshaded Zone "X" floodplain on the FEMA FIRM Map. Unshaded Zone "X" is defined as "areas determined to be outside the annual 2% chance floodplain, thus no significant risk of site inundation exists. There are no water bodies, natural or manmade, located in proximity to the Project site, thus

no risk of seiche or tsunami exists. In consideration of these facts, potential impacts pertaining to the release of pollutants due to flooding, tsunami and seiche are considered less than significant.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
Please see Response X-a) through c). The proposed project is subject to National Pollutant Discharge Elimination System (NPDES) requirements and is required to prepare a Stormwater Pollution Prevention Program (SWPPP). Compliance with these regulations will ensure that the proposed Project does not conflict with or obstruct a water quality control plan.

As has been noted in Response X-b). Loma Linda's main water source is ground water within the Bunker Hill Basin, which is primarily replenished by snow melt from the nearby San Bernardino Mountains. The City has prepared a water shortage contingency plan (WSCP), which regularly assesses and monitors the City's ability to provide sufficient water supply and to maintain water quality under normal as well as extended drought conditions,

In consideration of these facts, the proposed Project is not anticipated to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Hydrology and Water Quality:
In consideration of the preceding information and analysis, no significant adverse impacts related to hydrology and water quality have been identified or are anticipated and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XI.	**LAND USE AND PLANNING** - Would the project:				
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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Loma General Plan - Land Use Element.

a) **Physically divide an established community?**

Impact Discussion:
The Project site is integrated into the central portion of the City of Loma Linda and is adjacent to the Loma Linda University Medical Center. The site is designated on the Land Use Element of the General Plan and by existing zoning for Institutional Health Care facilities. It presently developed with a paved surface parking lot which the proposed medical office building will re-purpose. As such, the proposed Project will not physically divide an established community. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:
The proposed project is consistent with both existing land use and zoning designations, and this Initial Study has not identified any environmental impacts that cannot be mitigated to less than significant levels. There are no City programs, policies or regulations adopted for the purpose of avoiding or militating an environmental effect with which the proposed will conflict. No policy impacts are anticipated. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Land Use and Planning:
In consideration of the preceding information and analysis, no adverse impacts related to land use and planning have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XII.	**MINERAL RESOURCES** - Would the project:				
a)	Result in the loss of availability of a known mineral resource that will 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Loma Linda, Addendum to the General Plan Update Final Program EIR, 2008..

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

Impact Discussion:
No known mineral resources are located within the City. Thus, the proposed Project would not result in the loss of availability of a known mineral resource. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:
No locally important mineral resource recovery sites are located within the City. Thus, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Mineral Resources:
In consideration of the preceding information and analysis, no adverse impacts to mineral resources have been identified or are anticipated, and no mitigation measures are required.

Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIII. NOISE - Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: "Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024, as contained in Appendix E to this Initial Study.

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?

Impact Discussion:
The proposed Project will generate a temporary noise increase during construction activities as well as a permanent increase due to long term operations. The potential level of increase in ambient noise levels under these scenarios has been analyzed by Urban Crossroads, Inc. in a technical report included under Appendix E to this Initial Study. The following discussion briefly summarizes study methodology and key findings of this analysis.

- **Summary of Noise Analysis Methodology**

Construction Activities:
in analyzing noise from construction activities, impacts are typically limited to the hours of operation established under a jurisdiction's Municipal Code. Section 9.20.070 of the City of Loma Linda Municipal Code indicates that construction activity is considered exempt from the noise level standards between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday, except on weekends and national holidays. However, neither the City of Loma Linda General Plan or the Municipal Codes establish numeric maximum acceptable construction noise levels at potentially affected receivers, which would allow for a quantified determination of what constitutes a substantial temporary or periodic noise increase under CEQA Consequently, a numerical construction threshold based on Federal Transit

Administration (FTA) Transit Noise and Vibration Impact Assessment Manual has been used for analysis of daytime construction impacts. The FTA considers a daytime exterior

construction noise level of 80 dBA Leq (equivalent continuous noise level) as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA Leq.

Vibration Impacts:
To analyze vibration impacts originating from the operation and construction of the proposed Project, vibration-generating activities are typically evaluated against standards established under a jurisdiction's Municipal Code. However, since the City of Loma Linda does not identify specific vibration level standards, the San Bernardino County Development Code vibration level standards have been used in this analysis to assess potential impacts at nearby sensitive receiver locations. The County Development Code, Section 83.01.090(a) states that vibration shall be no greater than or equal to two-tenths inches per second measured at or beyond the lot line. Consequently, to determine vibration levels due to the operation and construction of the Project, the peak particle velocity (PPV) vibration level standard of 0.2 inches per second has been used in this analysis, Utilizing these standards, if the Project-related construction noise levels generate a temporary noise level increase above the existing daytime ambient noise levels of up to 20 dBA Leq, not to exceed 80 dBA Leq, or an increase of 5 dBA Leq above the existing nighttime ambient noise levels, the Project construction noise level increases would not be considered a potentially significant impact.

Transportation Noise:
A readily perceptible project related transportation generated noise increase 5 dBA or greater is considered a significant impact when the "without project" noise levels are below 60 dBA. In areas where the "without project" noise levels range from 60 to 65 dBA, a 3 dBA barely perceptible noise level increase appears to be the appropriate threshold for a significant impact for most people. When the "without project" noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance. **T**ypical responses to noise level increases of 5 dBA or more are "readily perceptible", while a 3 dBA increase is typically barely perceptible to the human ear.

Non-transportation Noise:
For non-transportation noise source activities, a substantial permanent noise level threshold increase consists of increases of 5 dBA (readily perceptible), and 3 dBA (barely perceptible), Table 9.0 provides a summary of significance criteria which are further described in the following discussion. Please refer to Appendix E for additional detailed information.

TABLE 9.0
SUMMARY OF NOISE IMPACT SIGNIFICANCE CRITERIA
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive[1]	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive[2]	if ambient is < 70 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
On-Site	Residential[2]	Exterior Noise Level Criteria	See Exhibit 3-A, Appendix E.	
		Interior Noise Level Standard	45 dBA CNEL	
Operational	Residential	Exterior Noise Level Standards	See Table 3-1, Appendix E.	
	Commercial	Exterior Noise Level Standards		
	Noise-Sensitive[1]	if ambient is < 60 dBA L_{eq}	≥ 5 dBA L_{eq} Project increase	
		if ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA L_{eq} Project increase	
		if ambient is > 65 dBA L_{eq}	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive	Permitted between 7:00 a.m. to 8:00 p.m. Monday through Friday; no activity on weekends or national holidays.[3]		
		Noise Level Threshold[4]	80 dBA L_{eq}	n/a
		Noise Level Increase	20 dBA L_{eq}	n/a
		Vibration Level Threshold[5]	0.2 in/sec PPV	n/a

[1] Source: FICON, 1992 and Urban Crossroads , Inc. .
[2] Source: City of Loma Linda General Plan Noise Element, Table 7.C.
[3] Source: City of Loma Linda Municipal Code, Section 9.20.070 .
[4] Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[5] Source: Section 83.01.090(a) of the County of San Bernardino County Code, Title 8 Development Code.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.; "n/a" = construction activities are not planned during the nighttime hours; "PPV" = peak particle velocity.

Ambient Noise Levels at Sensitive Receptor Locations:

To assess the existing noise environment, three 24-hour noise level measurements were taken at five sensitive receiver locations selected to describe and document the existing noise environment within the Project study area. These locations are shown in Exhibit 11. Collecting reference ambient noise level measurements at nearby sensitive receiver locations allows a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels. Noise-sensitive land uses are generally considered to include: schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Sensitive receivers near the Project site include existing mobile homes, and non-noise sensitive receiver locations include existing hotels and commercial uses. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

Background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network and nearby railroad lines. Table 10.0 presents 24-hour ambient noise level measurements at sensitive receptor locations. (Please refer to Appendix E for additional description of methodology.)

TABLE 10.0
24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Location[1]	Description	Energy Average Hourly Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located north of the site near the residence at 24946 Barton Rd.	61.3	57.9
L2	Located east of the site near the residence at 25010 Daisy Ave.	68.7	63.5
L3	Located east of the site near the residence at 25010 Fern Ave.	58.7	58.0
L4	Located south of the site near the Ronald McDonald House Charity	60.9	60.6
L5	Located south of the site near the residence at 24934 Tulip Ave.	57.2	57.4

EXHIBIT 11
SENSITIVE NOISE RECEIVER LOCATIONS

LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Source: Urban Crossroads, November 2024

- **Constructiounn Noise Impacts**

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages**:** site preparation, grading, building construction, paving and architectural coating. To describe the Project construction noise levels, measurements were collected for similar activities at several construction sites. Table 11.0 provides a summary of the construction reference noise level measurements.

TABLE 11.0
CONSTRUCTION REFERENCE NOISE LEVELS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Construction Stage	Reference Construction Equipmnet[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})	Reference Power Level (dBA L_w)
Site Preparation	Dozer	78.0	83.4	115.1
	Front End Loader	75.0		
	Grader	81.0		
Grading	Excavator	77.0	84.0	115.6
	Tractor	80.0		
	Scraper	80.0		
Building Construction	Crane	73.0	77.4	109.1
	Backhoe	74.0		
	Generator (<25kVA)	70.0		
Paving	Paver	74.0	77.8	109.5
	Dump Truck	72.0		
	Roller	73.0		
Architectural Coating	Man Lift	68.0	76.2	107.8
	Compressor (air)	74.0		
	Generator (<25kVA)	70.0		

[1] FHWA Road Construction Noise Model.
Source: "*Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024.*

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts with multiple pieces of equipment operating simultaneously at the nearest sensitive receiver locations were formulated. This includes any noise attenuation provided by the existing intervening building structures and noise barriers located between the Project site and the nearest receiver locations. To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. As shown in Table 12.0,

construction noise levels are expected to range from 59.0 to 72.1 dBA Leq, and the highest construction levels are expected to range from 66.8 to 72.1 dBA Leq at the nearest receiver locations.

TABLE 12.0
CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	66.3	66.8	60.2	60.7	59.0	66.8
R2	68.6	69.1	62.5	63.0	61.3	69.1
R3	70.1	70.6	64.0	64.5	62.8	70.6
R4	71.6	72.1	65.5	66.0	64.3	72.1
R5	66.4	66.9	60.3	60.8	59.1	66.9

[1] Noise receiver locations are shown in Exhibit 11.0
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearest receiver locations. CadnaA construction noise model inputs are included in Appendix E
Source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024.*

To evaluate whether the Project will generate potentially significant short-term construction related noise levels at the nearest noise sensitive receiver locations, a daytime noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts. Analysis illustrated in Table 13.0 shows that the nearest receiver locations will not exceed the daytime 80 dBA L_{eq} significance threshold during Project construction activities.

To describe the temporary Project construction noise level contributions compared to the existing ambient noise environment, the Project construction noise levels were combined with the existing ambient noise levels measurements at the nearest off-site receiver locations. Temporary noise level increases that would be experienced at sensitive receiver locations when Project construction-source noise is added to the ambient daytime conditions are presented on Table 14.0. A temporary noise level increase of 20 dBA is considered a *potentially significant* impact. As indicated in Table 13.0, the Project will contribute construction noise increases ranging from 3.2 to 12.2 dBA L_{eq} during the daytime hours at the nearest receiver locations. The unmitigated construction noise analysis shows that the nearest receiver locations will not exceed the substantial 20 dBA L_{eq} noise level increase significance threshold during Project construction activities. Consequently, impacts due to Project construction noise are considered less than significant and no mitigation measures are necessary.

TABLE 13.0
CONSTRUCTION NOISE LEVEL COMPLIANCE SUMMARY
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	66.8	80	No
R2	69.1	80	No
R3	70.6	80	No
R4	72.1	80	No
R5	66.9	80	No

[1] Noise receiver locations are shown in Exhibit 11.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations..
[3] Federal Transit Administration, Transit Noise and Vibration Impact Assessment noise level threshold.1.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
Source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024.*

- **Operational Noise Impacts**

The on-site Project-related noise sources are expected to include: trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements. To present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. Reference noise level measurements are shown in Table 14.0.

Using the reference noise levels to represent the proposed Project operations that include trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements, Urban Crossroads, Inc. calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 14 shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 9:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 42.9 to 45.2 dBA Leq.

Table 16.0 shows the Project operational noise levels during the nighttime hours of 9:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 40.3 to 42.1 dBA L_{eq}. The differences between the daytime and nighttime noise levels is largely related to the duration of noise activity.

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Loma Linda exterior noise level standards at the nearest noise-sensitive receiver locations. Table 16.0 shows the operational noise levels associated with the Project will satisfy the City of Loma Linda 65 dBA Leq daytime and 55 dBA Leq nighttime residential exterior noise level standards at all nearest receiver locations. Therefore, the operational noise impacts are considered less than significant at the nearest noise-sensitive receiver locations. No mitigation measures are necessary.

TABLE 14.0
OPERATIONAL ANALYSIS: REFERENCE NOISE LEVEL MEASUREMENTS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Noise Source	Noise Source Height (Feet)	Source Type	Min./Hour[4]		Reference Noise Level (dBA L_{eq}) @ 50 Feet	Sound Power Level (dBA)[5]
			Day	Night		
Trash Enclosure Activity[1]	5'	Point	10	10	57.4	89.0
Air Handling Unit[2]	5'	Point	45	30	69.4	101.0
Chiller Unit[2]	5'	Point	45	30	54.4	86.0
Roof Exhaust Unit[2]	2'	Point	45	30	41.4	73.0
Pkg Lot Vehicle Movements[3]	0'	Area	60	0	31.4	63.0

[1] As measured by Urban Crossroads, Inc. [2] See Appendix E for manufacturer data sheets.
[3] Each lot shown is calculated based on: Log10*(movements*($10^{(63\ dBA\ Lw/10)}$)).
[4] Aa Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
[5] Sound und power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source.

TABLE 15.0
DAYTIME PROJECT OPERATIONAL NOISE LEVELS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5
Roof-Top Air Conditioning	31.2	26.7	25.7	26.5	25.1
Trash Enclosure Activity	32.2	37.2	39.2	40.9	32.6
Car Wash Vacuum Heads	42.1	42.1	41.3	42.5	42.7
Car Wash Tunnel Blowers	26.8	29.6	32.3	34.0	35.2
Parking Lot Activity	20.4	17.3	18.4	19.3	19.9
Total (All Noise Sources)	**42.9**	**43.6**	**43.8**	**45.2**	**43.8**

Source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024*

TABLE 16.0
NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5

Roof-Top Air Conditioning	30.2	25.7	24.7	25.6	24.1
Trash Enclosure Activity	28.2	33.2	35.2	36.9	28.6
Car Wash Vacuum Heads	39.4	39.3	38.5	39.8	40.0
Car Wash Tunnel Blowers	24.1	26.8	29.6	31.3	32.4
Parking Lot Activity	17.7	14.6	15.7	16.5	17.1
Total (All Noise Sources)	**40.3**	**40.6**	**40.6**	**42.1**	**41.0**

Source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024*

TABLE 17.0
OPERATIONAL NOISE LEVEL COMPLIANCE
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Receiver Location[1]	Land Use	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	SF Res	42.9	40.3	55	45	No	No
R2	SF Res	43.6	40.6	55	45	No	No
R3	SF Res	43.8	40.6	55	45	No	No
R4	SF Res	45.2	42.1	55	45	No	No
R5	SF Res	43.8	41.0	55	45	No	No

[1] See Exhibit 11.0 for the receiver locations.
[2] Proposed Project operational noise levels -3. [3] Exterior noise level standards for residential land use,-1.
[4] Do the estimated Project operational noise activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m. source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024*

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is

expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Table 18.0 presents the expected typical construction equipment vibration levels at the nearest receiver locations. At distances ranging from 33 to 164 feet from typical Project construction activities (at the Project site boundary), construction vibration levels are estimated to range from 0.01 to 0.14. Based on maximum acceptable continuous vibration threshold of 0.20 PPV (in/sec) (in/sec), the typical Project construction vibration levels will not reach building damage thresholds at all receiver locations. Therefore, the Project-related vibration impacts are considered less than significant and no mitigation measures are necessary.

TABLE 18.0
TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS
LOMA LINDA PEDIATRIC MEDICAL OFFICE BUILDING

Receiver Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Level		
R1	164'	0.00	0.00	0.00	0.01	0.01	0.20	No
R2	47'	0.00	0.01	0.03	0.08	0.08	0.20	No
R3	51'	0.00	0.01	0.03	0.07	0.07	0.20	No
R4	33'	0.00	0.02	0.05	0.14	0.14	0.20	No
R5	151'	0.00	0.00	0.01	0.01	0.01	0.20	No

[1] Construction receiver locations are shown on Exhibit 11.0.
[2d]Distance from receiver location to Project construction boundary.
[3] Based on the Vibration Source Levels of Construction Equipment
[4 ff]FRTA Transit Noise and Vibration Impact Assessment, September 2018.
[5] "PPV" = Peak Particle Velocity
Source: *Loma Linda Medical Office Building – Noise Impact Study" prepared by Urban Crossroads, November 4, 2024*

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The Project site is not located within two miles of any private airstrip, a public airport or a public use airport. No impacts related to airport noise are anticipated. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Noise:
In consideration of the preceding information and analysis, no adverse impacts related to noise have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XIV.	**POPULATION AND HOUSING** - Would the project:				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Project Application Materials.

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)?**

Impact Discussion:
The Proposed Project is consistent with both the existing General Plan land use designation and zoning; thus it has been incorporated in planned growth. Project construction will generate temporary employment and the operation of the medical office building will generate approximately 279 jobs. A substantial portion of the long term jobs are, however, anticipated to be relocated from other LLUMC facilities in the local area to consolidate pediatric services at the new building. Thus, the net growth in employment will be less than 279 jobs. The proposed project does not require the alteration or expansion of any infrastructure systems or roadways. In consideration of these facts, the proposed project will have a less than significant impact pertaining to direct or indirect population growth. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The project site is currently developed as a surface parking lot. No displacement of people or housing will result. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Population and Housing:
In consideration of the preceding information and analysis, no adverse impacts pertaining to population and housing have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XV.	**PUBLIC SERVICES**				
a)	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:				
	Fire Protection?	☐	☐	☒	☐
	Police Protection?	☐	☐	☒	☐
	Schools?	☐	☐	☒	☐
	Parks?	☐	☐	☐	☒
	Other Public Facilities?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Project Application Materials, City of Loma Linda website. . .

a) **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:**

- **Fire Protection?**

Impact Discussion:
The Fire and Rescue Division of the Loma Linda Department of Public Safety provides fire protection for the City of Loma Linda.[16] Fire Station 251, located at 11325 Loma Linda Drive, and Fire Station 252, located at 10520 Ohio Street, services the City of Loma Linda. To ensure adequate fire protection services in an emergency, the City of Loma Linda maintains a joint response/automatic aid agreement with the fire departments in neighboring cities including Colton, Redlands, and San Bernardino. The Department also participates in the California Master Mutual Aid Agreement. Implementation of the Proposed Project would not cause a significant increase in population or new jobs in the City or result in a significant increase in service calls due to the operations of the proposed Project such that expansion of existing facilities or construction of new facilities would be necessary. The City of Loma Linda requires payment of development fees to mitigate impacts to infrastructure systems, including fire protection. With the collection of development fees, impacts related to fire protection are expected to be less than significant and no additional mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

- **Police Protection?**

Impact Discussion:
Police protection for the City is provided by and contracted through the San Bernardino Sheriff's Department, located at 655 East Third Street in San Bernardino, at Sheriff's Headquarters, Central Station. The City shares the cost of law enforcement personnel and equipment with the City of Grand Terrace. Implementation of the Proposed Project would not cause a significant increase in population or new jobs in the City or result in a significant increase in service calls due to the operations of the proposed Project such that expansion of existing facilities or construction of new facilities would be necessary. The City of Loma Linda requires payment of development fees to mitigate impacts to infrastructure systems, including police protection. With the collection of development fees, impacts related to police protection are expected to be less than significant and no additional mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

- **Schools?**

Impact Discussion:
Public education in the City of Loma Linda is provided by Redlands Unified School District (RUSD) except for the western portion of the City, which is served by Colton Joint Unified School District (CJUSD). In addition to these school districts, one community day school, overseen by San Bernardino County Superintendent of Schools Office, is located in the City of Loma Linda. While some population and job growth is expected as a result of the Proposed Project, it is not anticipated to generate new school students to a degree that would result in the expansion of existing schools or the construction of new schools (See Section XVI- Population and Housing.) The school districts serving Loma Linda collect development impact fees for the purpose of mitigating potential impacts to school facilities. With the collection of development impact fees, impacts to schools would be mitigated to less than significant level and no additional mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

- **Parks?**

Impact Discussion:
As described under Section XVI - Recreation, the potential net gain in local residents, as well as use of recreational facilities by future employees that may result from the proposed Project could result in a slight increase in the use of existing neighborhood and regional parks, but not to a level that would cause or accelerate substantial physical deterioration of existing recreational facilities or result in the need for expansion of existing parks or construction of new parks. The City of Loma Linda requires payment

of development fees to mitigate impacts to infrastructure systems, including parks. With the collection of development fees, impacts related to parks are expected to be less than significant and no additional mitigation measures are necessary

Level of Impact before Mitigation: Les than Significant.

Level of Impact After Mitigation: Less than Significant.

- **Other Public Facilities?**

Impact Discussion:
The potential net gain in local residents, as well as use public facilities by future employees that may result from the proposed Project could result in a slight increase in the use of a variety of other public services. The City of Loma Linda requires payment of development fees to mitigate impacts to infrastructure systems. With the collection of development fees, impacts related to other public services are expected to be less than significant and no additional mitigation measures are necessary

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions – Public Services:
In consideration of the preceding information and analysis, no adverse impacts to public services have been identified or are anticipated that are not mediated by the payment of development fees. No additional mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVI.	**RECREATION**				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: Project Application Materials.

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 will occur or be accelerated?**

Impact Discussion:
The proposed project is estimated to generate approximately279 jobs. The additional project related employment may potentially increase demand for housing in the local area, although it is reasonable to assume a substantial number of future employees already live in the local area because the LLUMC is a major regional medical facility. In addition, one of the primary objectives of the proposed medical office building is to consolidate pediatric services presently offered at other area LLUMC facilities. the potential net gain in local residents, as well as use of recreational facilities by future employees may result in a slight increase in the use of existing neighborhood and regional parks, but not to a level that would cause or accelerate substantial physical deterioration of existingrecreational facilities. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The proposed Project does not include any recreational facilities, nor would it require construction or expansion of existing recreational facilities, as described in the preceding Response XVI-a) above. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Recreation:
In consideration of the preceding information and analysis, no adverse impacts pertaining to recreation services or facilities have been identified or anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVII.	**TRANSPORTATION** – Would the project:				
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
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?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: "Loma Linda MOB VMT Analysis", prepared by Urban Crossroads, October 2024. (see Appendix F), Transportation and Circulation Element of the Loma Linda General Plan, 2009; City of Loma Linda Municipal Code; Omnitrans website: https://omnitrans.org/routes/route-19/.; Loma Linda University Health Rideshare Program Regulations (see Appendix G)

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

Impact Discussion:
The proposed project is consistent with the Loma Linda General Plan – Land Use and Circulation Elements, and existing zoning on-site. General Plan land use assumptions form the basis of other transportation planning programs such as the 2020 SoCal Connect program adopted by the Southern California Association of Governments (SCAG) and which addresses integrated regional transportation planning.

Barton Road, a fully improved roadway, which abuts the project site on the north, is classified as 4 lane divided highway with bike lanes, a landscaped median, and left turn pockets at major intersections. A bus stop on Omnitrans Route 19 is located on Barton Road adjacent to the Project Site at the corner of Anderson Street. This route provides connection with the Fontana Metrolink Transit Center. Barton Road is designated for a Class II Bicycle Facility which provides a striped lane for one-way bike travel. This Bike Lane is located on both sides of Barton Road. Pedestrian sidewalks exist abutting the Project site on both Barton Road and Anderson Street and no expansion of these facilities is anticipated. No roadway, transit, bicycle or pedestrian improvements have been determined necessary to accommodate development of the proposed Project.

The proposed Project may also be required to pay traffic mitigation fees to the City of Loma Linda which, among other purposes, are intended to contribute a fair share toward any necessary improvement or expansion of roadways, bicycle or pedestrian facilities needed in the project vicinity. In consideration of these facts, the proposed Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Level of Impact before Mitigation: Less than significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
CEQA Guidelines Section 15064.3, subdivision (b) specifies criteria for analyzing transportation impacts and states that Vehicle Miles Traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. The City of Loma Linda utilizes impact thresholds established by the County of San Bernardino. An analysis of estimated VMT that would be generated by the proposed Project has been prepared by the firm Urban Crossroads in compliance with these thresholds (see Appendix F. Key information and conclusions are summarized below.

The appropriate VMT metric for non-residential employment projects, such as the proposed medical office building, is VMT per employee. The County Guidelines state a project would result in a significant project-generated VMT impact if the following condition is met:

- A project should be considered to have a significant impact if the project VMT per person/employee is greater than 4% below the existing VMT per person/employee for the County

Additionally, if the Project is inconsistent with the Regional Transportation Plan or Sustainable Community Strategy (RTP/SCS), the Project's cumulative effect on VMT would be considered significant if it results in increases in the "with project" condition as compared to the "no project" condition. As is described under Response XVII-a), the proposed Project is considered consistent with assumptions utilized in regional transportation planning programs, per the second criteria, the proposed Project is considered less than significant.

Utilizing the San Bernardino Transportation Analysis Model (SBTAM), the proposed Project is estimated to generate 23.5 VMT per employee, which is above the County's threshold of 22.0 VMT per employee. Thus, the Project is forecast to exceed the County's threshold and will require VMT reduction strategies in the form of trip reduction measures to reduce VMT to the extent feasible. Analysis indicates that a 6.2% reduction in VMT would be required to fully mitigate the VMT impact of the proposed Project.

Rideshare regulations have been established by the Loma Linda University Medical Center (LLUMC) in compliance with Federal & State guidelines as established under the EPA (Environmental Protection Agency) 2002 - Clean Air Act, the California Air Resources Board and the SCAQMD (South Coast Air Quality Management District) Rule 2202 – Employer Emissions Reduction Plan & The On-Road Motor Vehicle Mitigation Plan. The proposed Project would be made a participant in this program, which is described in detail in Appendix G to this Initial Study.

In addition to participation in the LLUMC Rideshare Program, the following mitigation measure is recommended. Collectively, these measures would reduce project related VMT by approximately 7.2% and result in a Mitigated Project VMT per employee of 21.8 which would fall below the County significance threshold of 22.0 VMT per employee. With these measures, the VMT impact of the proposed project would be less than significant.

Level of Impact before Mitigation: Potentially significant

- **Mitigation Measures:**

Mitigation Measure TRA-1: Commute Trip Reduction (CTR) Marketing Program
The Project shall formulate a marketing strategy to promote and educate employees about their travel to work choices beyond driving, such as carpooling, taking transit, walking, and biking in order to reduce VMT. The project proponent is encouraged to integrate the MOB CTR program, to the extent practical, with any similar program that may exist for the LLUMC as a whole. The Project CTR program shall be submitted to the City Planner for approval prior to the issuance of Occupancy Permits. The following features (or similar alternatives) have been found to be critical to CTR program effectiveness:

- *On-site or online commuter information services.*
- *Employee transportation coordinators.*
- *On-site or online transit pass sales.*
- *Guaranteed ride home service.*

Mitigation Measure TRA – 2: End-of-Trip Bicycle Facilities
The proposed Project shall install and maintain end-of-trip bicycle facilities on-site for employee use. End-of-trip facilities may include bike parking, bike lockers, showers, and personal lockers.

Level of Impact After Mitigation: Less than significant.

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

Impact Discussion:
As has been previously noted, the proposed project will not necessitate any new or expanded roadway, transit, bikeway or pedestrian facilities. The proposed medical

office building is also consistent with General Plan land use and zoning designations; thus implementation would not result in introduction of an "incompatible use". In consideration of these facts, the proposed Project would have no impact with respect to roadway hazards or introduce an incompatible use in the area.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact..

d) **Result in inadequate emergency access?**

Impact Discussion:
As has been previously noted, the proposed project will not necessitate any new or expanded roadway, transit, bikeway or pedestrian facilities. Regional emergency access would not be impacted by the project. The Fire Access Plan for the proposed Project, illustrated in Exhibit 11.0, shows the accessible path of travel for fire engines on-site and meets the requirements of the California Code and Chapter 15.28 – Fire Code, of the City of Loma Linda. Project plans must also be reviewed and approved by the Loma Linda Fire Department prior to project approval. No adverse impacts to emergency access are anticipated.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Transportation:
In consideration of the preceding information and analysis, no adverse impacts related to transportation have been identified that cannot be mitigated to less than significant level, and appropriate mitigation measures have been incorporated in the proposed Project.

Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XVIII. TRIBAL CULTURAL RESOURCES				
a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

SUBSTANTIATION:

Sources: "Cultural Resources Report for the Loma Linda University Children's Hospital Pediatric Medical Office Building Project, Loma Linda, San Bernardino County, California", by BCR Consulting, September 2024 (contained in Appendix B); City of Loma Linda General Plan EIR, Section 4.5.2- Cultural Resources, prepared by LSA Associates, 2004.

a) **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) ?

Impact Discussion:
According to PRC Chapter 2.5, Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and items with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in Section 5020.1. Public agencies

must treat any such resources as significant unless the preponderance of evidence demonstrates that they are not historically or culturally significant. The Project site is presently occupied by a paved surface parking lot. No structures of any kind are located on-site and there were no cultural resources identified as eligible for listing to the California Register of Historic Places within or near the Project site during the cultural resources assessment as contained in Appendix B or during the City's AB52 consultation. Therefore, there would be no impact to known tribal cultural resources. However, during the AB52 tribal consultation, the Yuhaaviatam of San Manuel Nation YSMN responded and expressed interest in the Project. The YSMN requested that **CUL-1, CUL-2 and CUL-3,** located in Section V- Cultural Resources, of this document, be made a part of the project/permit/plan conditions to protect for unidentified resources. No other mitigation is considered necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?

Impact Discussion:
Section 15064.5 of CEQA Guidelines pertains to procedures for determining the significance of impacts to archaeological and historical resources. Per Section 15064.5 a "historical resource" is a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources, or a resource included in a local register of historical resources or identified as significant in an historical resource survey. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant. The Project site is presently occupied by a paved surface parking lot. No structures of any kind are located on-site. The definition of a "historical resource" as outlined in CEQA Guidelines Section 15064.5, thus, does not apply to the Project site. No impact to historical resources will occur and no mitigation measures are necessary

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions - Tribal Cultural Resources:
In consideration of the preceding information and analysis, no adverse impacts to tribal cultural resources have been identified or are anticipated, and no mitigation measures beyond CUL-1**,** CUL-2, and CUL-3 incorporated under Section V - Cultural Resources, are considered necessary.

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

SUBSTANTIATION:

Sources: City of Loma Linda General Plan and General Plan EIR, City of Loma Linda Website.

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

Impact Discussion:
The City of Loma Linda would provide domestic (potable) water supply, sewer and wastewater treatment to the proposed project utilizing existing facilities. Wastewater

treatment services are administered under provisions in a Joint Powers Agreement (JPA) with the City of San Bernardino. The City of San Bernardino wastewater facility has the capacity to process up to 33 million gallons per day (gpd), of which 7 million gpd

is allotted to Loma Linda. Of the 7 million gpd allocation, the City currently uses less than half of the assigned 7 million gpd. According to the Loma Linda General Plan, the average wastewater flow generated by the City during ultimate build out conditions is projected to be 6.27 million gpd. Because the proposed Project is consistent with the General Plan, it has been assumed in the ultimate build-out condition scenario. Thus sufficient wastewater treatment capacity exists to accommodate the proposed Project.

The City also requires payment of development impact fees to provide for adequate infrastructure systems including water generation, storage and distribution facilities, storm drainage facilities and wastewater collection systems. In addition, the City of San Bernardino Water Department requires payment of impact fees pertaining to wastewater treatment capacity, With payment of appropriate development impact fees, potential impacts of the proposed Project to water, wastewater treatment and storm drainage facilities are considered less than significant. No mitigation measures are necessary.

Extension of other services by commercial providers, such electric power, natural gas, and telecommunicators would not be significantly impacted by the proposed Project. None of the urban services systems outlined would be impacted to a degree that would require the construction of new facilities or the relocation of which could cause significant environmental effects. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The Proposed Project will receive water from the City of Loma Linda which provides water from six production wells. Loma Linda's main water source is ground water within the Bunker Hill Basin, which is primarily replenished by snow melt from the nearby San Bernardino Mountains. Based on analysis conducted by the City of Loma Linda Public Works Department, the local water supply is considered sufficient to meet projected demand without implementing restrictive measures. The project site is consistent with the General Plan and existing zoning, thus development of the site for a health care facility has been considered in the city’s water planning programs. The type of development proposed (medical office) is also not considered a large water consumer relative to other land uses such as residential land uses.

Should extended drought conditions occur, however, the City has prepared a water shortage contingency plan (WSCP), which is available for review on the City’s website under the Public Works Department. This plan regularly assesses and monitors the City’s ability to provide sufficient water supply and to maintain water quality during

normal conditions as well as throughout extended drought conditions. If necessary, the City also has the ability to draw emergency supplemental water supply from the adjacent cities of Redlands and San Bernardino. The WSCP also outlines "demand reduction actions" that the city can implement if conditions warrant. These include measures suchas limiting landscape irrigation, use of potable water for washing hard surfaces, limiting service of water in restaurants, requiring evaporation covers on pools, restricting water use for decorative water features and similar actions. The City of Loma Linda also requires payment of development impact fees for water generation, storage and distribution facilities. In consideration of these facts, the City of Loma Linda is anticipated to have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
Please refer to Response XIX - a) above**.** Wastewater treatment services are administered under provisions in a Joint Powers Agreement (JPA) with the City of San Bernardino. The City of San Bernardino wastewater facility has the capacity to process up to 33 million gallons per day (gpd), of which 7 million gpd is allotted to Loma Linda. Of the 7 million gpd allocation, the City currently uses less than half of the assigned 7 million gpd. According to the Loma Linda General Plan, the average wastewater flow generated by the City during ultimate build out conditions is projected to be 6.27 million gpd. Because the proposed Project is consistent with the General Plan, it has been assumed in the ultimate build-out condition scenario. Thus sufficient wastewater treatment capacity exists to accommodate the proposed Project. In addition, the City of San Bernardino Water Department requires payment of impact fees pertaining to wastewater treatment capacity, With payment of appropriate development impact fees, potential impacts of the proposed Project to wastewater treatment facilities are considered less than significant. No mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
Solid waste services to the City of Loma Linda currently contracts with CR&R Environmental Services to provide solid waste collection services. Solid waste that is

not diverted to recycling or composting facilities is transported to the San Timoteo Sanitary Landfill, a County-owned landfill located in the City of Redlands. The San Timoteo Sanitary Landfill is permitted to receive up to a maximum of 2,000 tons per day. It is estimated that the average disposal rate is 663 tons per day. Under this assumption, landfill capacity is currently anticipated to last until the year 2044. The proposed project would not generate a significant amount of additional solid waste into the City's waste stream. Impacts to the solid waste collection system would be less than significant and no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
To achieve the State-mandated solid waste diversion goal, the City of Loma Linda has implemented a variety of programs that seek to reduce the volume of solid waste generated, encourage reuse, and support recycling efforts. The City also requires all projects to comply with Resolution No. 2129 Construction and Demolition Recycling/Reuse Policy as adopted by the City Council. Consequently, the proposed Project will comply with federal, state, and local management and reduction statutes and regulations related to solid waste. No adverse impacts have been identified or are anticipated and no mitigation measures are necessary.

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

Summary Conclusions – Utilities and Services:
In consideration of the preceding information and analysis, no adverse impacts to utilities and services have been identified or anticipated, and no mitigation measures are required.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XX.	**WILDFIRE:** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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 wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, 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?	☐	☐	☐	☒

SUBSTANTIATION:

Sources: City of Loma Linda General Plan, Safety Element, and General Plan EIR. :

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

Impact Discussion:
The central portion of the City of Loma Linda in which the proposed Project is suburban in character. The City of Loma Linda fire Department maintains and implements a Hazard Mitigation Plan as required by State Law. The Plan includes ongoing emergency response coordination with surrounding jurisdictions, including the County of San Bernardino, and a public awareness program among other features. All new developments must comply with the California Building Code and California Fire Code. As has been noted, the proposed Project incorporates a Fire Access Plan (See Exhibit 8.0) that must be reviewed and approved by the City of Loma Linda Fire Department.

The City's Hazard Mitigation Plan designates the area as a moderate risk for wildland fires due to the proximity of hilly undeveloped land to the smith of the City. The Safety Element of the Loma Linda General Plan indicates that Barton Road, as one of the two major east-west roadways in the City, is a designated evacuation route. No physical

alteration of the adjoining streets (Barton Road and Anderson Street) is proposed with the Project, thus no impacts to its function as an evacuation route are anticipated.

In consideration of these facts, the proposed Project is not anticipated to adversely affect any aspect of an adopted emergency response plan or an emergency evacuation plan. No mitigation measures are necessary

Level of Impact before Mitigation: Less than Significant.

Level of Impact After Mitigation: Less than Significant.

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

Impact Discussion:
The site topography is essentially level and the site is surrounded by suburban development. The level of exposure to prevailing winds would be similar throughout the City. There are no physical characteristics of the Project site that would make it prone to any factor that would exacerbate wildfire risks. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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

Impact Discussion:

The Project site is integrated into the City, and does not require the installation or maintenance of any unusual infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

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?**

Impact Discussion:

Please see Responses VII-a) iv, Geology and Soils and Response X-c), Hydrology and Water Quality. The Project site and the surrounding area is not subject to significant flooding and has no landslide risks. No mitigation measures are necessary.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

Summary Conclusions – Wildfire:
In consideration of the preceding information and analysis, no adverse impacts related to wildfire risks have been identified or are anticipated, and no mitigation measures are necessary.

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
XXI.	**MANDATORY FINDINGS OF SIGNIFICANCE:**				
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c)	Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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?**

Summary impact discussion:
The proposed Project is located within a suburban setting. There is no natural habitat existing on-site or in the adjacent area. The site is presently developed as a surface parking lot. No impacts to biological or historical resources have been identified in this Initial Study.

Level of Impact before Mitigation: No Impact.

Level of Impact After Mitigation: No Impact.

b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Summary Impact discussion:
The proposed Project is consistent with both the General Plan land use designation and zoning on the site and no project specific impacts that cannot be mitigated to a less than significant level have been identified. Although not significant on its own, the proposed Project would contribute to cumulative air emissions in the region, including greenhouse gases, as would all future development in the region. The Loma Linda General Plan EIR was prepared to determine if any significant adverse environmental effects would result with implementation of the proposed General Plan. It concluded that the General Plan would result in unavoidable significant impacts to air quality as well as other impacts. Mitigation measures were adopted for all significant impacts; however, they would not reduce all cumulative impacts to less than significant levels. As such, the City adopted a statement of overriding considerations to balance the benefits of development under the General Plan against the significant unavoidable adverse impacts. All reasonable mitigation measures have been incorporated into the proposed Project such that it's contribution to cumulative impacts can be considered less than significant.

Level of Impact before Mitigation: Potentially significant.

Level of Impact After Mitigation: Less than Significant.

c) **Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?**

Summary Impact discussion:
The Proposed Project would not environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. The following impact areas were found to either have "no impact" or "less than significant impacts" pertaining to the proposed project without mitigation: aesthetics, air quality, geology and soils (exposure of humans to significant geological and seismic conditions), hazards and hazardous materials (exposure of humans to hazardous materials or conditions), noise, and wildfire risks. Impacts requiring mitigation to be reduced to less than significant levels included: cultural resources, greenhouse gases and traffic (vehicle miles travelled). With mitigation, all impacts were reduced to less than significant levels.

Level of Impact before Mitigation: Potentially Significant.

Level of Impact After Mitigation: Less than Significant

MITIGATION MEASURES

Any mitigation measures, which are not "self-monitoring", shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval. A Draft Mitigation Monitoring and Reporting Program is contained in Appendix H to this Initial Study. The following Mitigation Measures have been identified in the Initial Study and should also be incorporated into Project Conditions of Approval.

- **Cultural Resources**

Mitigation Measure CUL-1: *If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease until a qualified archaeologist meeting Secretary of Interior standards is hired to assess the find and resources are recovered and/or recorded. 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 regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, in order to provide Tribal input with regards to potential significance and treatment.*

Mitigation Measure CUL-2: *If significant pre-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Pla and any resources collected shall be curated with an appropriate reposition. This plan shall be provided to Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) in its draft form for review and comment. The archaeologist shall monitor the remainder of the project and implement the Monitoring and Treatment Plan accordingly. A final report shall be filed with the City Planner documenting any archaeological resources found and their disposition.*

Mitigation Measure CUL-3: *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. A report shall be filed with the City Planner documenting any human remains or funerary objects found and their disposition.*

- **Transportation**

Mitigation Measure TRA-1 Commute Trip Reduction (CTR) Marketing Program
The Project shall formulate a marketing strategy to promote and educate employees about their travel to work choices beyond driving, such as carpooling, taking transit, walking, and biking in order to reduce VMT. The project proponent is encouraged to integrate the MOB CTR program, to the extent practical, with any similar program that may exist for the LLUMC as a whole. The Project CTR program shall be submitted to the City Planner for approval prior to the issuance of Occupancy Permits. The following features (or similar alternatives) have been found to be critical to CTR program effectiveness:

- *On-site or online commuter information services.*
- *Employee transportation coordinators.*
- *On-site or online transit pass sales.*
- *Guaranteed ride home service.*

Mitigation Measure TRA – 2 End-of-Trip Bicycle Facilities
The proposed Project shall install and maintain end-of-trip bicycle facilities on-site for employee use. End-of-trip facilities may include bike parking, bike lockers, showers, and personal lockers.

BIBLIOGRAPHY

GENERAL REFERENCES

- **City of Loma Linda**

1. General Plan, prepared by LSA Associates, 2009 and 2022 Update, Elements: Land Use, Safety, Transportation and Circulation;

2. General Plan Update Final Program EIR, prepared by LSA Associates, 2004, Chapters: Cultural Resources, Geology and Soils, and Safety:

3. Addendum to General Plan Update Final Program EIR, 2008, prepared by LSA Associates;

4. Municipal Code, Multiple sections

5. Zoning Map, 2021

6. "Local Hazard Mitigation Plan", prepared by City of Loma Linda Fire Department, 2021.

7. "Water Shortage Contingency Plan", prepared by Water Systems Consultants, Inc. April 2021;

8. "Part 2: Upper Santa Ana River Watershed - Integrated Regional Urban Water Management Plan", prepared by Water Systems Consultants, Inc., 2020

9. Development Impact Fees Schedule, 2022.

- **Other Agencies**

10. "SoCal Connect, The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy", Southern California Association of Governments and CalTrans, 2020;

11. Omnitrans Routes and Schedules, Omnitrans.org.

12. "Flood Insurance Rtae Mao (FIRM) Panel 8692H, San Bernardino County , Ca and incorporated Areas" , Federal Emergency Management Agency, August 2008.

PROJECT SPECIFIC REFERENCES

13. "Cultural Resources Report for the Loma Linda University Children's Hospital Pediatric Medical Office Building Project, Loma Linda, San Bernardino County, California", Prepared by BCR Consulting, September 2024;

14. "Loma Linda Medical Office Building – Air Quality Impact Analysis, City of Loma Linda", Prepared by Urban Crossroads, Inc., November 2024;

15. "Loma Linda Medical Office Building – Greenhouse Gas Analysis, City of Loma Linda", Prepared by Urban Crossroads, Inc., November 2024;

16. "Loma Linda Medical Office Building – Noise Impact Analysis, City of Loma Linda", Prepared by Urban Crossroads, Inc., November 2024;

17. "Loma Linda Medical Office Building – Vehicle Miles Traveled (VMT(Analysis, City of Loma Linda", Prepared by Urban Crossroads, Inc., October, 2024.

18. "Erosion Control Plan - Loma Linda University Children's Medical Office Building" , Prepared by Goodman & Associates, July 2024;

19. "Water Quality Management Plan For Loma Linda University Children's Medical Office Building, LOMA LINDA CA", prepared by Goodman & Associates, August 2023;

20. "Geotechnical Engineering Report - Proposed Children's Clinics Outpatient Pavilion Loma Linda, San Bernardino County, California", prepared by Terracon Consultants, Inc, December 2022;

21. Master Development Application, Pediatric Medical Office Building, Case number: PPD- P23-180, August 2023.

22. Pediatric Medical Office Building, Project Plans, by Mascari Warner Dinh Architects, February 2024.

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