City of San Bernardino

# CITY OF SAN BERNARDINO GENERAL PLAN UPDATE, DEVELOPMENT CODE UPDATE, AND DOWNTOWN SPECIFIC PLAN

**June 2026 | Draft Environmental Impact Report**

**State Clearinghouse No. 2025070856**



PLACEWORKS

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# GENERAL PLAN UPDATE, DEVELOPMENT CODE UPDATE, AND DOWNTOWN SPECIFIC PLAN

for the City of San Bernardino


**City of San Bernardino**
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# EXECUTIVE SUMMARY

## ES.1 INTRODUCTION

This executive summary has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. This Draft Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the proposed City of San Bernardino General Plan Update, Development Code Update, and Downtown Specific Plan. CEQA requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and State governmental agency decision makers.

This EIR has been prepared pursuant to the requirements of CEQA and the City of San Bernardino's CEQA procedures. The City of San Bernardino, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on City of San Bernardino's technical personnel from other departments and review of all technical subconsultant reports.

## ES.2 ENVIRONMENTAL PROCEDURES

This EIR has been prepared pursuant to CEQA and the CEQA Guidelines to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis, and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a statement of overriding considerations if significant impacts cannot be avoided.

## ES.2.1 Draft EIR Organization

**Executive Summary.** Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues that need to be resolved, and the potential environmental impacts and recommended mitigation measures identified for the project.

**Chapter 1: Introduction.** Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

**Chapter 2: Project Description.** Provides a detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

**Chapter 3: Environmental Analysis.** Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

**Chapter 4: Alternatives to the Proposed Project.** Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative and the Reduced Warehousing Alternative.

**Chapter 5: Other CEQA Considerations.** Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

**Chapter 6: Report Preparers and Organizations Consulted.** Includes a list of people and organizations that prepared or were contacted during the preparation of this Draft EIR.

**Appendices.** The appendices for this document include the following supporting documents:

- Appendix A: Notice of Preparation
- Appendix B: Buildout Memorandum
- Appendix C: AQ, GHG, and Energy Modeling
- Appendix D: Biological Resources Report
- Appendix E: Hazardous Sites in the City of San Bernardino
- Appendix F-1: General Plan Update Utilities and Infrastructure Report
- Appendix F-2: Downtown Specific Plan Utilities and Infrastructure Report
- Appendix G: Noise Modeling
- Appendix H: Public Service Letters
- Appendix I-1: General Plan Update Transportation Study/VMT Impact Analysis
- Appendix I-2: Downtown Specific Plan Transportation Study
- Appendix I-3: Downtown Specific Plan VMT Study

## ES.2.2 Type and Purpose of this Draft EIR

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses.

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as for a Project EIR, Program EIRs are typically more conceptual than Project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a Program EIR gives the lead agency an opportunity to consider broad policy alternatives and program wide mitigation measures, with greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare Program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the

Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities may be within the Program EIR's scope, and additional environmental documents may not be required (CEQA Guidelines sec. 15168[c]). When a lead agency relies on a Program EIR for a subsequent activity, it must incorporate feasible mitigation measures and alternatives from the Program EIR into the subsequent activities (CEQA Guidelines sec. 15168[c][3]). If a subsequent activity would have effects outside the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The CEQA Guidelines encourage the use of Program EIRs, citing five advantages:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
- Focus on cumulative impacts that might be slighted in a case-by-case analysis;
- Avoid continual reconsideration of recurring policy issues;
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them;
- Reduce paperwork by encouraging the reuse of data (through tiering). (CEQA Guidelines sec. 15168[h])

# ES.3 PROJECT LOCATION

The location of the proposed project consists of the entirety of the City of San Bernardino and its sphere of influence (SOI), which forms the geographic scope of the General Plan and Dev Code Updates, and a 621-acre portion of the downtown, which encompasses the Downtown Specific Plan (DTSP) area. As seen throughout this DEIR, separate environmental analyses are provided for impacts of the General Plan and Development Code Updates at the citywide scale and for the DTSP within the DTSP area.

The Dev Code will apply to all land within the city limits except where a specific plan has been adopted. In these areas if the Specific Plan is adopted by ordinance it will contain its own development parameters and requirements.

## ES.3.3 Citywide Setting

The City of San Berardino encompasses approximately 62 square miles (39,680 acres) with approximately 8 square miles (5,120 acres) of unincorporated land that falls within the City's Sphere of Influence (SOI). It is in the center of the urbanized Valley Region of San Bernardino County and approximately 60 miles east of the City of Los Angeles. This area composes the geographic scope of both the General Plan Update and Development Code Update and is referred to as the "General Plan Update Area" or "Citywide area".

The city is framed by several major geographical features, including the San Bernardino Mountains to the northeast and east, the Blue Mountains and the Box Springs Mountains to the south, the Cajon Wash to the west, and the San Gabriel Mountains and the Jurupa Hills to the northwest and southwest, respectively. San Bernardino borders the Cities of Rialto to the west, Colton to the southwest, Loma Linda to the south, Redlands to the southeast, Highland to the east, and the San Bernardino National Forest to the north. Due to its location, San Bernardino is situated as a gateway to the mountain resorts and is also a gateway to southern California due to its proximity to the Cajon Pass, a major natural entry from the high deserts and points east. In addition to the Cajon Wash at the city's western border, the Santa Ana River also crosses the southern portion of the city. Several major roadways traverse the city, including State Route (SR) 210, SR-259, Interstate (I) 215, and I-10, which largely forms the southern border of the City. The boundaries of the Citywide area are depicted in Figure 2-1, *Citywide Project Area,* in Chapter 2, *Project Description.*

### ES.3.4 Downtown Area

The Downtown Specific Plan Area consists of approximately 621 acres in Downtown San Bernardino that stretches from east of I-215 until Sierra Way, and from 8th Street to the railroad tracks south of Rialto Avenue. It encompasses several city landmarks, including City Hall, the 43-acre City-owned former Carousel Mall Site, the County Government Center, Meadowbrook Park, and the City Transit Center. The boundaries of the Specific Plan Area are depicted in Figure 2-2, *Downtown Specific Plan Project Area*, in Chapter 2.

## ES.4 SUMMARY OF THE PROPOSED PROJECT

The proposed project encompasses three related planning efforts that will be analyzed under this EIR: the City's General Plan Update, Development Code Update, and a Downtown Specific Plan for Downtown San Bernardino.

### ES.4.5 General Plan Update

The City's General Plan is a planning document that represents the community's vision for its future. It meets the requirements of California State law for each city to adopt a comprehensive, long-term general plan (Govt. Code sec. 65300). The City uses the goals and policies of the General Plan as a basis from which to make decisions about land use, housing, mobility, infrastructure, and open space, and conservation, among other topics. The City's existing General Plan was adopted in 2005 and includes both the seven elements required under Govt. Code sec. 65300 and eight additional permissive elements.

The proposed General Plan Update intends to update the City's existing 2005 General Plan and guide growth in the city until the horizon year of 2050. This update would consist of changes to

comply with State housing mandates; conform with new State laws related to community health, environmental justice, climate adaptation, resiliency, and mobility; and bring long-term growth and fiscal projections into alignment with current economic conditions and State mandates. The following elements are included as part of this General Plan Update:

- Land Use and Urban Form
- Economic Development
- Circulation and Mobility
- Utilities and Infrastructure
- Public Facilities and Services
- Parks, Recreation, and Trails
- Open Space and Conservation
- Cultural Resources
- Noise
- Safety
- Health and Environmental Justice

The City's existing Community Design Element will not be updated individually as part of this update but instead relevant urban design topics are integrated within the proposed Land Use and Urban Form Element. The existing Energy and Conservation Element and Natural Resources and Conservation Element are also combined as the proposed Open Space and Conservation Element. Additionally, the City's Housing Element, a required element of a general plan, was already updated and adopted by the City on February 21, 2024 and is therefore not a part of this update.

The City's Land Use Plan is a key component of the General Plan Update intended to guide growth in San Bernardino over the next 25 years. The proposed Land Use Plan intends to focus growth and development inward through infill and intensification of vacant and underutilized properties within San Bernardino's existing urbanized areas, while preserving the uses and densities of its established residential neighborhoods and open spaces. Changes to the City's existing Land Use Plan include new designations, including several new mixed-use categories, in addition to changes to the densities/intensities allowed under existing designations. Buildout of the General Plan Update under the proposed Land Use Plan would result in approximately 36,000 new housing units, 63,600 new residents, 41 million square feet of non-residential space, and 60,500 new jobs in the City by 2050, as shown in Table ES-1, *General Plan Buildout Summary*.

**Table ES-1 General Plan Buildout Summary**

| Scenario | Housing Units | Population | Nonresidential Square Feet | Employment |
|---|---|---|---|---|
| Existing Conditions (2025) | 77,051 | 267,267 | 101,575,944 | 111,690 |
| Proposed General Plan (2050) | 112,991 | 330,982 | 142,744,306 | 172,190 |
| **Potential Growth** | **35,940** | **63,624** | **41,168,362** | **60,500** |

## ES.4.6 Downtown Specific Plan

The proposed Downtown Specific Plan proposes a set of focused strategies to transform Downtown San Bernardino into a vibrant and livable center of community identity and activity. The Specific Plan includes a vision statement, objectives, and planning principles; land use, mobility, and infrastructure plans; development standards; design guidelines; an implementation plan; and an economic development strategy.

The DTSP defines the City's vision for the downtown, defines and describes nine downtown Land Use Districts, establishes a land use plan for future development of the nine districts, provides development standards for each district, and discusses circulation and infrastructure plans for the Specific Plan Area. The nine proposed Land Use Districts would become the new land use designations and zoning districts for all development within the Downtown Specific Plan Area. These districts consist of the Downtown Neighborhoods, North Gateway, Freeway Commercial, Transit Neighborhood, Downtown Core, County Center, Parkview Campus, Railside, and Transit Center.

Table ES-2, *Total Development Under the Downtown Specific Plan,* shows the extent of existing development and the proposed new development resulting from full development of the DTSP. The DTSP would result in the net addition of up to approximately 14,000 new residential units and 11.7 million square feet of non-residential space.

**Table ES-2 Total Development Under the Downtown Specific Plan**

| District Area | Existing Residential Units | New Residential Units | TOTAL | Existing Non-Residential (square feet) | New Non-Residential (square feet) | TOTAL |
|---|---|---|---|---|---|---|
| Downtown Neighborhood | 776 | 971 | **1,747** | 1,146,787 | 63,630 | **1,210,417** |
| North Gateway | 173 | 1,505 | **1,678** | 392,335 | 409,812 | **802,147** |
| Freeway Commercial | 24 | 0 | **24** | 89,279 | 191,649 | **280,928** |
| Transit Neighborhood | 342 | 5,872 | **6,214** | 310,781 | 3,288,686 | **3,599,467** |
| Downtown Core | 0 | 3,768 | **3,768** | 1,219,479 | 4,689,452 | **5,908,931** |
| County Center | 0 | 0 | **0** | 551,547 | 1,057,332 | **1,608,879** |
| Parkview Campus | 0 | 1,184 | **1,184** | 25,983 | 662,978 | **688,961** |
| Railside | 0 | 262 | **262** | 71,595 | 854,961 | **926,556** |
| Transit Center | 0 | 590 | **590** | 32,663 | 514,357 | **547,020** |
| **TOTAL** | **1,315** | **14,152** | **15,467** | **3,840,449** | **11,732,857** | **15,573,306** |

## ES.4.7 Development Code Update

Title 19 (Land Use/ Subdivision Regulations) of the San Bernardino Municipal Code is the primary tool for implementing the goals, objectives, and policies of the Land Use Element, pursuant to the mandated provisions of the State Planning and Zoning Law (Government Code Section 65000 et seq.), CEQA (Public Resources Code Section 21000 et seq.), and other applicable State and local requirements.). The proposed updates would consist of improving the efficiency of administrative procedures, updating development and design standards, and revising the zoning land use map to ensure consistency with the proposed Land Use Plan under the General Plan Update.

# ES.5 SUMMARY OF PROJECT ALTERNATIVES

The CEQA Guidelines Section 15126.6(a) states that an EIR must address "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." The alternatives

in this Draft EIR were based, in part, on their potential to reduce or eliminate the impacts determined to be potentially significant for implementation of the proposed project (see Table ES-3, *Summary of Significant Environmental Impacts and Mitigation Measures*). The project alternatives were not reviewed for financial feasibility. Project alternatives are assessed in further detail in Chapter 4, *Alternatives to the Proposed Project*.

## ES.5.1 No Project Alternative

The "No Project/Existing Plans" alternative would reduce impacts with respect to aesthetics, air quality, greenhouse gas emissions, noise, population and housing, public services, recreation, and utilities and service systems, for both the General Plan/Development Code Update and DTSP. This alternative would increase impacts with respect to land use and planning and transportation for both the General Plan/Development Code Update and DTSP. Impacts would remain similar for agricultural and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, and tribal cultural resources for both the General Plan/Development Code Update and DTSP. This alternative would increase mineral resource impacts in the General Plan Update Area but would have no change to impacts in the DTSP Area. Additionally, wildfire impacts would decrease under this alternative in the General Plan Update Area but remain the same in the DTSP Area.

This alternative would partially meet the General Plan Update's objectives since it would maintain the existing General Plan and Development Code which addresses most of the same topics as the proposed General Plan Update. However, it would not meet any DTSP objectives since it would not implement a specific plan for the downtown area.

## ES.5.2 Reduced Warehousing Alternative

The "Reduced Warehousing" alternative would decrease impacts to aesthetics, air quality, energy, greenhouse gas emissions, noise, population and housing, public services, recreation, and utilities and service systems under the General Plan Update and result in similar impacts for agricultural and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. Impacts related to land use and planning and transportation would increase under this alternative. All impacts under the DTSP would remain the same because this alternative would have no impact on the implementation of the DTSP. This alternative would meet all objectives of the DTSP since the DTSP's land use plan does not include large-scale industrial development. This alternative would largely meet the objectives of the General Plan Update, but would not provide as diverse of employment opportunities as the proposed Land Use Plan, thereby only partially meeting Objective 3 under the General Plan Update. Additionally, this alternative would not support Objective 5 under the General Plan Update because it would result in less

jobs in the city, eliminating the potential for an industry of significant importance to the city and region to grow. The loss of these jobs and revenue for the City could also affect its economy.

# ES.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. For the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this EIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the EIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

# ES.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the Draft EIR, the City of San Bernardino issued a Notice of Preparation (NOP) on 7/21/2025. The CEQA-mandated scoping period for this EIR was between 7/21/2025 and 8/19/2025, during which interested agencies and the public could submit comments about the potential environmental impacts of the proposed project. During this time, the City of San Bernardino received comment letters from the commenters represent a diverse set of stakeholders, including state agencies, environmental organizations, and public health advocates. The Native American Heritage Commission, a state agency, outlined mandatory legal procedures for tribal consultation. Non-profit groups like the Endangered Habitats League and Californians Allied for a Responsible Economy provided comments focused on conservation, sustainable urban design, and public health, highlighting concerns over air quality, greenhouse gas emissions, and housing. Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the NOP as well as the comments received by the City of San Bernardino in response to the NOP.

The following list includes issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. Though every concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive; rather, it attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Ensuring strict procedural compliance with AB 52 and SB 18 to avoid legal challenges and project delays. This includes correctly identifying affiliated tribes, providing timely notice, and documenting the consultation process.
- Conducting a Health Risk Assessment to address toxic pollution and environmental justice concerns.
- Setting strict climate targets and detailing a plan to offset the project's carbon footprint.
- Identifying and preserving historical buildings and archaeological sites.
- Delivering on promises for transit-oriented, walkable neighborhoods with housing for all income levels.
- Demanding specific, feasible, and legally binding measures to reduce all significant impacts, not vague promises.

# ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-3 presents significant impacts and mitigation measures, including the impact’s level of significance after imposing mitigation measures. For a complete description of potential impacts, including those where no mitigation measures are required, please refer to the specific discussions in Sections 3.1 through 3.20.

## Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **AESTHETICS** | | | |
| **Impact AES-1a**: Implementation of the General Plan Update would have significant and avoidable impacts on scenic vistas. | Potentially Significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **Impact AES-1b:** Implementation of the Downtown Specific Plan would have significant and avoidable impacts on scenic vistas. | Potentially Significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **AIR QUALITY** | | | |
| **Impact AIR-1a**: Buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP. | Potentially Significant | Implement Mitigation Measures AIR-1 and AIR-2. | Significant and unavoidable |
| **Impact AIR-1b:** Buildout of the Downtown Specific Plan would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP. | Potentially Significant | Implement Mitigation Measures AIR-1 and AIR-2. | Significant and unavoidable |
| **Impact AIR-2a**: Short-term emissions from buildout of the General Plan Update could exceed South Coast AQMD's threshold criteria and cumulatively | Potentially Significant | **Mitigation Measure AIR-1:** Prior to discretionary approval by the City of San Bernardino for development projects subject to CEQA (California Environmental Quality Act) review (*i.e.*, nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| contribute to the nonattainment designations in the SoCAB. | | quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with the South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of San Bernardino Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include but are not limited to the following:<br>▪ Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:<br>  ○ Requiring use of nontoxic soil stabilizers to reduce wind erosion.<br>  ○ Applying water every four hours to active soil disturbing activities.<br>  ○ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.<br>▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.<br>▪ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.<br>▪ Limiting nonessential idling of construction equipment to no more than five consecutive minutes.<br>▪ Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.<br>These identified measures shall be incorporated into all appropriate construction documents (*e.g.*, construction management plans) submitted to the City and shall be verified by the City's Planning Department. | |
| **Impact AIR-2b**: Short-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | Implement Mitigation Measure AIR-1. | Significant and unavoidable |
| **Impact AIR-3a:** Long-term emissions from buildout of the General Plan Update would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | **Mitigation Measure AIR-2:** Prior to discretionary approval by the City of San Bernardino for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of San Bernardino Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational | Significant and Unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | activities. The identified measures shall be included as part of the conditions of approval.<br>Possible mitigation measures to reduce long-term emissions could include but are not limited to the following:<br>▪ For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.<br>▪ Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.<br>▪ Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 sec. 2485).<br>▪ Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>▪ Provide facilities to support electric charging infrastructure per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>▪ Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check. | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **Impact AIR-3b**: Long-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | Implement Mitigation Measure AIR-2. | Significant and Unavoidable |
| **Impact AIR-4a**: Construction activities associated with buildout of the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-1. | Significant and Unavoidable |
| **Impact AIR-4b**: Construction activities associated with buildout of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-1. | Significant and Unavoidable |
| **Impact AIR-5a**: Operational activities associated with the General Plan Update could expose sensitive receptors to substantial criteria air pollutant and/or toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measure AIR-2, in addition to the following Mitigation Measure:<br>**Mitigation Measure AIR-3: Industrial and Warehouse Development Health Risk Assessments.** Prior to discretionary approval by the City of San Bernardino, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of San Bernardino Planning Division for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T-BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan. | |
| **Impact AIR-5b**: Operation of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-2 and AIR-3. | Significant and unavoidable. |
| **BIOLOGICAL RESOURCES** | | | |
| **Impact BIO-1a**: Implementation of the General Plan Update could result in impacts to aquatic resources, including water of the U.S. and State. | Potentially Significant | **Mitigation Measure BIO-1:** If riparian/riverine resources and vernal pools are proposed for avoidance, the habitat assessment shall include a commitment to place a conservation easement or deed restriction over the area in order to demonstrate that the area will be protected in perpetuity. If a project cannot avoid riparian/riverine habitat and/or vernal pools in perpetuity (both permanent and | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| contribute to the nonattainment designations in the SoCAB. | | quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with the South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of San Bernardino Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include but are not limited to the following:<br>▪ Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:<br>  ○ Requiring use of nontoxic soil stabilizers to reduce wind erosion.<br>  ○ Applying water every four hours to active soil disturbing activities.<br>  ○ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.<br>▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.<br>▪ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.<br>▪ Limiting nonessential idling of construction equipment to no more than five consecutive minutes.<br>▪ Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.<br>These identified measures shall be incorporated into all appropriate construction documents (*e.g.*, construction management plans) submitted to the City and shall be verified by the City's Planning Department. | |
| **Impact AIR-2b**: Short-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | Implement Mitigation Measure AIR-1. | Significant and unavoidable |
| **Impact AIR-3a:** Long-term emissions from buildout of the General Plan Update would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | **Mitigation Measure AIR-2:** Prior to discretionary approval by the City of San Bernardino for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of San Bernardino Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational | Significant and Unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | activities. The identified measures shall be included as part of the conditions of approval.<br>Possible mitigation measures to reduce long-term emissions could include but are not limited to the following:<br>▪ For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.<br>▪ Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.<br>▪ Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 sec. 2485).<br>▪ Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>▪ Provide facilities to support electric charging infrastructure per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.<br>▪ Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check. | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **Impact AIR-3b**: Long-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB. | Potentially Significant | Implement Mitigation Measure AIR-2. | Significant and Unavoidable |
| **Impact AIR-4a**: Construction activities associated with buildout of the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-1. | Significant and Unavoidable |
| **Impact AIR-4b**: Construction activities associated with buildout of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-1. | Significant and Unavoidable |
| **Impact AIR-5a**: Operational activities associated with the General Plan Update could expose sensitive receptors to substantial criteria air pollutant and/or toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measure AIR-2, in addition to the following Mitigation Measure:<br>**Mitigation Measure AIR-3: Industrial and Warehouse Development Health Risk Assessments.** Prior to discretionary approval by the City of San Bernardino, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of San Bernardino Planning Division for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T-BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan. | |
| **Impact AIR-5b**: Operation of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations. | Potentially Significant | Implement Mitigation Measures AIR-2 and AIR-3. | Significant and unavoidable. |
| **BIOLOGICAL RESOURCES** | | | |
| **Impact BIO-1a**: Implementation of the General Plan Update could result in impacts to aquatic resources, including water of the U.S. and State. | Potentially Significant | **Mitigation Measure BIO-1:** If riparian/riverine resources and vernal pools are proposed for avoidance, the habitat assessment shall include a commitment to place a conservation easement or deed restriction over the area in order to demonstrate that the area will be protected in perpetuity. If a project cannot avoid riparian/riverine habitat and/or vernal pools in perpetuity (both permanent and | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | temporarily), a Determination of Biological Equivalent or Superior Preservation (DBESP) shall be required that would propose mitigation that demonstrates equivalent or superior function and value and shall be submitted to the City of San Bernardino Community and Economic Development Department. and applicable Wildlife Agencies.<br>**Mitigation Measure BIO-2:** If an action will impact riparian habitat as determined by a qualified biologist, a Lake and Streambed Alteration Agreement, pursuant to Section 1602 of the California Department of Fish and Game Code shall be obtained prior to the start of ground disturbing activities. Minimization measures will be developed during consultation with California Department of Fish and Wildlife (CDFW) as part of the Lake and Streambed Alteration Agreement process to ensure protections for affected fish and wildlife resources.<br>**Mitigation Measure BIO-3:** If an action has the potential to affect aquatic resources, an environmental analysis (i.e., a preliminary aquatic resources delineation) shall be conducted to determine if potentially regulated aquatic resources occur within the action area. A qualified wetland delineator shall conduct the environmental analysis. The analysis shall include a review of the best available hydrological information, a reconnaissance-level site visit, and an evaluation of aquatic resources to determine the potential for regulated aquatic resources to occur within the action area. If it is determined that there are no potentially regulated aquatic resources, no other measures are recommended and the habitat assessment shall be submitted to the City of San Bernardino Community Development Department and applicable Wildlife Agencies. If conditions or circumstances change after the environmental analysis is conducted and prior to ground-disturbing activities, the validity of the results shall be confirmed, or an updated environmental analysis shall be conducted prior to affecting the action area. | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | **Mitigation Measure BIO-4:** If an action may impact potentially regulated aquatic resources, an aquatic resources delineation shall be conducted by a qualified biologist for a project consistent with the methods detailed within the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987), Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008), and State Wetlands Definitions and Procedures for Discharges of Dredged and Fill Material to Waters of the State, and local policies by the California Department of Fish and Wildlife (CDFW) regarding their jurisdiction, following the definitions contained within the California Fish and Game Code pertaining to regulated resources (lakes, streams, and associated hydrophytic vegetation). If it is determined by a qualified biologist that potentially regulated aquatic resources are absent from a project site or will not be impacted by the action, no other measures are recommended, and the habitat assessment shall be submitted to the San Bernardino Community Development Department and US Army Corps of Engineers (USACE). If it is determined that potentially regulated aquatic resources may be impacted by the action, the delineation shall be submitted to the USACE, and a Preliminary Jurisdictional Determination or Approved Jurisdictional Determination shall be obtained. The project applicant shall obtain all required permits from the USACE and applicable agencies prior to the start of construction activities. | |
| **Impact BIO-2a**: Implementation of the General Plan Update could impact wildlife movement. | Potentially Significant | **Mitigation Measure BIO-5:** The City shall coordinate with applicable wildlife resource agencies (e.g., CDFW, USFWS) to develop a wildlife movement and habitat linkages plan or map for the General Plan Update Area. The plan/map shall:<br>▪ Be based on the best available biological information, including regional studies and databases; | Less than significant |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | ▪ Identify existing and potential wildlife movement corridors, regional and local habitat linkages, and areas important for wildlife breeding, foraging, or dispersal; and<br>▪ Prioritize areas for protection, avoidance, or strategic enhancement.<br>**Mitigation Measure BIO-6:** For any discretionary action that may adversely affect wildlife movement, established or potential wildlife corridors, or wildlife nursery sites, the project applicant shall prepare a biological resources assessment (BRA) conducted by a qualified biologist. The BRA shall:<br>▪ Review the best available biological information, including CDFW's CNDDB, BIOS, and the programmatic wildlife linkages plan;<br>▪ Include a reconnaissance-level site visit; and<br>▪ Evaluate biological conditions within and adjacent to the action area to determine whether the project would substantially affect wildlife movement, corridor functionality, or the use of nursery sites<br>▪ If the BRA determines that the action would not substantially affect wildlife movement, corridors, or nursery sites, no further mitigation is required.<br>▪ If the BRA determines that the action would substantially affect wildlife movement, corridors, or nursery sites, the City shall require implementation of avoidance, minimization, and/or mitigation measures developed in consultation with applicable resource agencies (e.g., CDFW, USFWS, NMFS). Measures may include, but are not limited to:<br>▪ Project redesign or siting to avoid corridors or nursery sites;<br>▪ Clustering of development;<br>▪ Conservation easements; | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | ▪ Habitat restoration or enhancement;<br>▪ Wildlife crossings or wildlife-permeable fencing.<br>▪ All required measures shall be incorporated as enforceable conditions of project approval to maintain or restore functional wildlife connectivity in accordance with the programmatic linkages plan. | |
| **Impact BIO-2b**: Implementation of the Downtown Specific Plan could impact wildlife movement. | Potentially Significant | Implement Mitigation Measures BIO-5 and BIO-6. | Less than significant |
| **CULTURAL RESOURCES** | | | |
| **Impact CUL-1a**: Implementation of the General Plan Update would impact historical resources. | Potentially Significant | **Mitigation Measure CUL-1:** Project applicants shall complete site-specific evaluations at the time that individual projects are proposed at or adjacent to buildings that have been identified by the Built Environment Sensitivity Model (see Figure 3-5-1, *Built Environment Sensitivity*), as having high or assumed high sensitivity, or for structures that could meet National Register of Historic Places (NRHP) criteria, to determine if they are historical resources as defined by CEQA. This evaluation shall be carried out by a professional who meets the Secretary of the Interior's Standards for Architectural History, and the results of the evaluation shall be submitted as a Historic Architectural Assessment Report to the City of San Bernardino. Once the report is reviewed and approved by the City, a copy of the report should be submitted to the South Central California Information Center (SCCIC). CEQA Guidelines Section 15064.5(b)(3) states that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | Buildings (1995), by Weeks and Grimmer, shall be considered mitigated to a level of less than significant. Therefore if, under the project-by-project review described above, a structure is determined to be a historical resource as defined by CEQA, the Secretary of the Interior's guidelines referenced above shall be followed for demolition, rehabilitation, and/or alteration projects. In addition, Historic American Building Survey/Historic American Engineering Record (HABS/HAER) documentation of the resource shall be prepared. The level of documentation should be described in HABS documentation level II, which includes, at a minimum, measured drawings such as as-builts or original design plans; historic photographs, if available; current large-format photographs of significant architectural design features; and written history and description. The documentation shall be submitted to the City of San Bernardino. | |
| **Impact CUL-1b**: Implementation of the Downtown Specific Plan would impact historical resources. | Potentially significant | Implement Mitigation Measure CUL-1. | Significant and unavoidable |
| **Impact CUL-2a**: Implementation of the General Plan Update would impact archeological resources. | Potentially significant | **Mitigation Measure CUL-2:** Prior to any ground-disturbing activities that excavate previously undisturbed soils, the project applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards to prepare a Phase I archaeological resources study consistent with the California Environmental Quality Act (CEQA) and/or Section 106 of the National Historic Preservation Act, as applicable.<br>**Records and Field Review:** The study shall include a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). A search of the Sacred Lands File conducted by the Native American Heritage Commission (NAHC). A field survey using standard archaeological field | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | methods that meet the standards of the Secretary of the Interior (SOI).<br>**Potential Discovery:** If archaeological resources are identified during the study or during construction, they shall be evaluated for significance under the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). If any resources are found to be significant and could be impacted by project activities, appropriate treatment measures—such as avoidance, preservation in place, or data recovery—shall be developed and implemented by the qualified archaeologist in coordination with the City.<br>If recommended by the archaeologist based on site sensitivity and study results, archaeological monitoring during initial ground-disturbing activities may be required. All findings, evaluations, and treatment measures shall be documented in a technical report submitted to the City for review and inclusion in the project's environmental record. | |
| **Impact CUL-2b**: Implementation of the Downtown Specific Plan would impact archeological resources. | Potentially Significant | Implement Mitigation Measure CUL-2. | Significant and unavoidable |
| **GEOLOGY AND SOILS** | | | |
| **Impact GEO-1a:** Implementation of the General Plan Update could impact paleontological resources. | Potentially significant | **Mitigation Measure GEO-1**: Prior to issuance of a grading permit for discretionary projects that involve ground disturbance in previously undisturbed areas, the project applicant shall retain a Certified Paleontologist to assess the potential for paleontological resources and the potential for project construction to affect such resources if present. The evaluation shall be based on established professional standards, including review of geologic mapping and known fossil | Less than significant |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | localities. If it is determined, to the satisfaction of the City, that there is low potential for discovery or disturbance of paleontological resources, no further action shall be required.<br>If potential for discovery is deemed moderate to high, the project applicant shall retain a Certified Paleontologist to monitor all initial ground-disturbing activities in native soils or sediments. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required, and the paleontologist shall submit a memo to the City confirming findings of low potential.<br>**Mitigation Measure GEO-2**: Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 50-foot radius of the discovery site shall be halted or diverted to other areas on the site, and the City shall be immediately notified. A Certified Paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.<br>Further ground disturbance shall not resume within a 50-foot radius of the discovery site until an agreement has been reached between the project applicant, a Certified Paleontologist, and the City as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.<br>Salvage and collection of significant fossils shall be in accordance with the Society of Vertebrate Paleontology guidelines. Any paleontological resources salvaged shall be provided for curation at a local curation facility or any other local museum or repository, such as the Western Science Center or World Museum of Natural History, | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | willing and able to accept and house the resource to preserve for future scientific study. | |
| **Impact GEO-1b:** Implementation of the Downtown Specific Plan could impact paleontological resources. | Potentially significant | Implement Mitigation Measures GEO-1 and GEO-2. | Less than significant |
| **GREENHOUSE GAS EMISSIONS** | | | |
| **Impact GHG-1a**: Implementation of the General Plan Update would result in an increase in GHG emissions and would not achieve the GHG reduction goals established under AB 1279. | Potentially significant | **Mitigation Measure GHG-1.** The City of San Bernardino shall prepare a Climate Action Plan (CAP) to align GHG emissions targets in the City with the GHG reduction targets of Assembly Bill (AB) 1279. The CAP shall be completed within 60 months of certification of the General Plan Update EIR. The CAP shall be updated every five years to ensure the City is monitoring the plan's progress toward achieving the City's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving the specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP. The CAP shall include the following:<br>GHG inventories of existing and forecast year GHG levels.<br>Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction and carbon neutrality goal for year 2045 of Assembly Bill 1279. These may include measures identified in the Priority Climate Action Plan (PCAP) for the San Bernardino County Transportation Authority (SBCTA) region, but are not limited to:<br>▪ Encouraging electric vehicle adoption through incentive or education programs. | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | ▪ Adopting local ordinances or policies that require greater energy efficiency, waste reduction, and water conservation in new construction, additions, and/or alterations.<br>▪ Encouraging the construction of solar arrays above parking lots, as well as the integration of solar and other renewable energy generation technologies in new construction, additions, and/or alterations.<br>▪ Encouraging the incorporation of energy storage and other grid-harmonizing infrastructure in new construction, additions, and/or alterations.<br>▪ Collaborating with Southern California Edison to encourage existing developments to upgrade natural gas equipment (e.g., furnaces) with electric equipment (e.g., heat pumps).<br>▪ Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP:<br>▪ Administration and Staffing<br>▪ Finance and Budgeting<br>▪ Timelines for Measure Implementation<br>▪ Community Outreach and Education<br>▪ Monitoring, Reporting, and Adaptive Management<br>▪ Tracking Tools | |
| **Impact GHG-1b**: Implementation of the Downtown Specific Plan would result in an increase in GHG emissions and would not achieve the goals established under AB 1279. | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **Impact GHG-2a**: Implementation of the General Plan Update would result in a substantial increase in VMT per service population and would not be consistent with SCAG's Connect SoCal. | Potentially significant | Implement Mitigation Measure GHG-1. | Significant and unavoidable |
| **Impact GHG-2b**: Implementation of the Downtown Specific Plan would not be consistent with several goals of SCAG's Connect SoCal. | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **LAND USE AND PLANNING** | | | |
| **Impact LU-1a**: Implementation of the General Plan Update would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect. | Potentially significant | Implement Mitigation Measures AIR-1, AIR-2, AIR-3, and GHG-1. | Significant and unavoidable |
| **Impact LU-1b**: Implementation of the Downtown Specific Plan would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect. | Potentially significant | Implement Mitigation Measures AIR-1, AIR-2, AIR-3, and GHG-1. | Significant and unavoidable |
| **NOISE** | | | |
| **Impact NOI-1a**: Buildout of the General Plan Update would expose sensitive receptors to | Potentially significant | **Mitigation Measure NOI-1:** Prior to any construction activity such as grading, site prep, or issuance of building permits, a note shall be provided on construction plans indicating that during construction | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| substantial temporary construction noise increases in the vicinity of the project. | | activities and phasing the project applicant shall be responsible for requiring contractors to implement the following measures to limit construction-related noise to a performance standard of 80 dBA Leq at the property line of the nearest sensitive receptor:<br>▪ Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.<br>▪ At a minimum, the construction contractor shall implement the following control measures: improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds.<br>▪ Equipment used for project construction shall be hydraulically or electrically powered impact tools (e.g., jack hammers) wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. A muffler could lower noise levels from the exhaust by up to about 10 dBA.<br>▪ External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures shall be used (such as drilling rather than impact equipment) wherever feasible.<br>▪ The construction contractor shall not allow any construction equipment, trucks, or vehicles to idle.<br>▪ Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near | |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| | | receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.<br>▪ Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.<br>▪ Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.<br>▪ Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.<br>▪ Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule. | |
| **Impact NOI-1b**: Buildout of the Downtown Specific Plan would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project. | Potentially Significant | Implement Mitigation Measure NOI-1. | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **Impact NOI-2a:** Buildout of the General Plan Update would expose sensitive receptors to substantial permanent traffic noise increases within the project area. | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **Impact NOI-3a**: Construction activities associated with buildout of the General Plan Update may expose sensitive uses to excessive levels of groundborne vibration. | Potentially significant | **Mitigation Measure NOI-2:** Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, sensitive laboratory uses, or surgical clinics, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed the City's Municipal Code Section 15.68.020 vibration standard 0.7 in/sec RMS for equipment or machinery and the FTA architectural damage thresholds (e.g., 0.12 inches per second [in/sec' peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as static rollers and pre-drilling piles, as opposed to pile driving, shall be used. | Less than significant |
| **Impact NOI-3b**: Construction activities associated with buildout of the Downtown Specific Plan may expose sensitive uses to | Potentially significant | Implement Mitigation Measure NOI-2. | Less than significant |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| excessive levels of groundborne vibration. | | | |
| **POPULATION AND HOUSING** | | | |
| **Impact POP-1a**: Buildout of the General Plan Update would result in substantial growth that exceeds regional projections for growth in the City. | Potentially Significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **Impact POP-1b:** Buildout under the Downtown Specific Plan would result in substantial growth that exceeds regional projections for growth in the City. | Potentially Significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **RECREATION** | | | |
| **Impact REC-1b:** Buildout of the Downtown Specific Plan would exceed the demand for exiting recreational facilities in the Downtown Specific Plan area, potentially resulting in deterioration of existing facilities. | Potentially Significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **TRANSPORTATION** | | | |
| **Impact T-1a**: The General Plan Update would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy. | Potentially Significant | Implement Mitigation Measures AIR-1, AIR-2, AIR-3, and GHG-1. | Significant and unavoidable |

## Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| **Impact T-1b:** The Downtown Specific Plan would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy. | Potentially Significant | Implement Mitigation Measures AIR-1, AIR-2, and AIR-3. | Significant and unavoidable |
| **Impact T-2a**: The General Plan Update would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b). | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **Impact T-2b**: The Downtown Specific Plan would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b). | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |
| **TRIBAL CULTURAL RESOURCES** | | | |
| **Impact TCR-1a**: Tribal cultural resources could be adversely impacted by grading activities associated with the General Plan Update. | Potentially significant | Implement Mitigation Measure CUL-2. | Significant and unavoidable |
| **Impact TCR-1b**: Tribal cultural resources could be adversely impacted by grading activities | Potentially significant | Implement Mitigation Measure CUL-2. | Significant and unavoidable |

**Table ES-3 Summary of Significant Environmental Impacts and Mitigation Measures**

| Environmental Impact | Level of Significance without Mitigation | Mitigation Measures | Level of Significance with Mitigation |
|---|---|---|---|
| associated with the Downtown Specific Plan. | | | |
| **WILDFIRE** | | | |
| **Impact WIL-1a**: Development under the General Plan Update would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks. | Potentially significant | No feasible mitigation measures are available. | Significant and unavoidable |

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# 1. INTRODUCTION

## 1.1 PURPOSE

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. The environmental impact report (EIR) is a public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage, and to identify alternatives to the project that would reduce environmental impacts disclosed in the EIR. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects. This document is a draft environmental impact report (DEIR) prepared by the City of San Bernardino to satisfy the requirements of CEQA.

## 1.2 INTENT

The intent of this DEIR is to provide sufficient information on the potential environmental impacts of the proposed General Plan Update, Downtown Specific Plan, and Development Code update (project, proposed project).

This DEIR has been prepared in accordance with the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code [PRC] §§ 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations [CCR], Title 14, §§ 15000 et seq.)

## 1.3 TYPE OF EIR

This DEIR has been prepared as a Program EIR following CEQA Guidelines Section 15168. This type of document is used to evaluate the potential impacts of future actions citywide rather than as a project EIR that would focus on the impacts of a single project. This difference is important because the proposed project consists of policies and regulations rather than physical construction of a structure. As such, there are no project details to evaluate for impact, and the size of the City at 39,680 acres is such that individual site analysis for development is infeasible.

Consequently, the proposed project includes programs and procedures that guide both the type of development anticipated, as well as the process whereby the City will evaluate individual projects as applications are submitted. As a program DEIR, the analysis will explain how the application of policies contained in the proposed project, as well as compliance with existing federal and state law, and the permitting requirements of local and regional agencies to address environmental impacts. In most instances future projects will require their own environmental analysis and the City will apply the programs in the proposed project, as well as application of permitting requirements by others, to address project specific impacts. Even in instances where future projects will not trigger CEQA, some federal, state, and regional requirements will still be required and discussed in this DEIR. Specific discretionary actions to be reviewed by the City are described in Section 2.8, *Intended Uses of the EIR*.

# 1.4 LEAD AGENCY

A lead agency is "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (Public Resources Code § 21067). The City of San Bernardino has the principal responsibility for approval and implementation of the City of San Bernardino General Plan Update, Development Code Update, and Downtown Specific Plan (proposed project). For this reason, the City of San Bernardino is the CEQA lead agency for this project.

# 1.5 ENVIRONMENTAL REVIEW PROCESS

## 1.5.1 Notice of Preparation

In compliance with PRC Section 21080.4, the City circulated a Notice of Preparation (NOP) of an EIR for the proposed project to the California Governor's Office of Land Use and Climate Innovation's (LCI) State Clearinghouse and interested agencies and people on July 21, 2025, for a 30-day review period. A public scoping meeting was held on Wednesday, July 30, 2025, at 6:00 pm. The NOP and scoping process solicited comments from responsible and trustee agencies[1] and interested parties regarding the scope of the environmental analysis in the Draft EIR. Appendix A of this Draft EIR, *Notice of Preparation and Scoping Comments*, contains the

[1] A responsible agency is a public agency with the responsibility for carrying out or approving a project for which the lead agency is preparing or has prepared an EIR. Responsible Agencies include all public agencies other than the lead agency which have discretionary approval power over a project (CEQA Guidelines Section 15381). A trustee agency is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. There are four trustee agencies—Department of Fish and Wildlife, State Lands Commission, Department of Parks and Recreation, and the University of California (CEQA Guidelines Section 15386).

NOP and the comments received by the City in response to the NOP. The comments made during the scoping period are summarized in Table 1-1.

**Table 1-1 Summary of Comments on the NOP**

| Commenting Agency/Person | Date | Comment Summary | Issue Addressed In: |
|---|---|---|---|
| Native American Heritage Commission (NAHC) | 7/22/25 | ▪ Requests that the EIR and proposed project adhere to the requirements of SB 18 and AB 52, including consultation with culturally affiliated tribes.<br>▪ Outlines the procedures for complying with tribal cultural resource protection laws and notes that NAHC should be contacted to receive a Native American Tribal Consultation List. | ▪ Section 3.5, *Cultural Resources*<br>▪ Section 3.18, *Tribal Cultural Resources* |
| Endangered Habitats League | 7/23/25 | ▪ Requests that the proposed project encourage transit-oriented development, walkable design, and housing for multiple income levels. | ▪ Section 3.14, *Population and Housing*<br>▪ Section 3.17, *Transportation* |
| Californians Allied for a Responsible Economy (CARE CA) | 8/19/25 | ▪ Requests that the DEIR include a complete analysis of all identified impacts, implementation of all feasible mitigation, and study of a reasonable range of alternatives.<br>▪ The letter specifically requests that the DEIR's project objectives encourage informed decision making and public participation and that the DEIR include a health risk assessment.<br>▪ Requests that the City adopt thresholds for GHG emissions impacts. | ▪ Section 3.3, *Air Quality*<br>▪ Section 3.8, *Greenhouse Gas Emissions*<br>▪ Section 4, *Alternatives* |

### 1.5.2 Draft EIR

The scope of this DEIR was determined based on the CEQA Guidelines Appendix G Checklist and comments received in response to the NOP. As required by sections 15126.2 and 15126.4 of the CEQA Guidelines, this DEIR identifies potentially significant adverse impacts and recommends mitigation that would reduce or eliminate these impacts to levels of insignificance.

This DEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to Gabriel Elliott, Director, Community Development and Housing Department at Elliott_ga@sbcity.org, or mail comments to 201 North East Street, 3rd Floor, City of San Bernardino, California, 92401. Upon completion of the 45-day review period, the City of San Bernardino will review all written comments received and prepare written responses for each comment.

### 1.5.3 Final EIR Certification

A Final EIR (FEIR) will incorporate the received comments, City responses to the comments, and any changes to the DEIR that might result from the comments. The FEIR will be presented to the City of San Bernardino for potential certification as the environmental document for the project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing before the City.

The DEIR is available to the general public for review at the following locations:

- On the City's website: https://www.sanbernardino.gov/376/CEQA-Notices-Environmental-Documents
- On the City's General Plan website: https://futuresb2050.com/
- In person at the following locations:
  - City of San Bernardino Community Development and Housing Department: 201 N E St, 3rd Floor, San Bernardino, CA, 92401
  - Feldheym Central Library: 555 West 6th Street, San Bernardino, CA 92410
  - Inghram Branch Library: 1505 W Highland Avenue, San Bernardino, CA 92411
  - Muscoy Baker Family Learning Center: 2818 Macy Street, Muscoy, CA 92407

## 1.6 MITIGATION MONITORING

PRC Section 21081.6 requires agencies to adopt a monitoring or reporting program (MMRP) for any project for which it has made environmental impact findings pursuant to PRC Section 21081. Such a program is intended to ensure the implementation of all mitigation measures in

an EIR. The Mitigation Monitoring Program for the City of San Bernardino will be completed as part of the Final EIR, prior to consideration of the project by the City of San Bernardino City Council. CEQA Section 15097(b) also allows for the City to use the General Plan Annual Report as a form of reporting on the use of the policies in the proposed project to mitigate environmental impacts. The exact form of MMRP will be explained in the Final EIR.

# 1.7 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft EIR, consistent with section 15150 of the CEQA Guidelines, and they are available for review at the City of San Bernardino Department of Community Development and Housing.

- **City of San Bernardino Municipal Code** (https://www.sanbernardino.gov/187/Municipal-Code). The municipal code contains regulations and standards that apply to new development. The standards of the municipal code may be referenced in this EIR as a means of addressing one or more physical impacts.

- **City of San Bernardino 6th Cycle 2021-2029 Housing Element** (https://www.sanbernardino.gov/DocumentCenter/View/1700/San-Bernardino-2021-to-2029-Housing-Element-Jan-2024-PDF?bidId=). The Housing Element is a required element of the City's General Plan that describes how the City will meet its local housing needs in accordance with Section 65583 of the Government Code. The Department of Housing and Community Development issued a letter certifying compliance of the Housing Element on February 16, 2024 and the San Bernardino City Council adopted the 2021-2029 Housing Element on February 21, 2024. This Housing Element underwent environmental review at the time of its adoption and therefore, is not explicitly analyzed as part of the General Plan Update in this DEIR. However, the proposed Land Use Plan and Dev Code Update reflect the rezoning/re-designations needed to meet the City's Regional Housing Needs Allocation, as described in the Housing Element. The buildout of the General Plan Update also incorporates the capacities of the sites identified in the Housing Element.

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# 2. PROJECT DESCRIPTION

The purpose of this chapter of the Draft Environmental Impact Report (EIR) is to describe the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, referred to together as the "proposed project" to the public, reviewing agencies, and decision makers. Pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines (CEQA Guidelines, Section 15124), an environmental impact report (EIR) should contain a description of the proposed project that includes:

a. The precise location and boundaries of the proposed project;

b. A statement of the objectives sought by the proposed project, including the underlying purpose of the project;

c. A general description of the proposed project's technical, economic, and environmental characteristics; and

d. A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits and other approvals required to implement the proposed project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

This Draft EIR has been completed in accordance with CEQA, which requires that State and local public agencies analyze proposed projects to determine potential impacts on the environment and disclose any such impacts. The City of San Bernardino (City) is the lead agency for the environmental review of the proposed project.

An adequate project description should not supply extensive detail beyond that needed for evaluation and review of environmental impacts. Accordingly, this chapter describes the necessary details of the proposed project that are critical in assessing the direct, indirect, long-term, and temporary impacts associated with project implementation. This chapter provides a detailed description of the components of the proposed project, the project's objectives, the principal project components, and required permits and approvals.

# 2.1 INTRODUCTION

The proposed project consists of three related planning efforts for the City: the City's General Plan Update, which intends to update the City's existing 2005 General Plan to conform with new State laws and revise the City's long-term growth and fiscal projections; a Development Code Update, which would revise portions of Title 19 of the City's Municipal Code (Dev Code) to be consistent with the changes made by the General Plan Update; and a Downtown Specific Plan (also referred to as the "DTSP") that would guide growth and development within a section of the City's Downtown.

"Project," as defined by the CEQA Guidelines, means:

> ... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. sec. 15378[a])

The proposed project consists of an amendment to the City's zoning ordinances, which are housed in the Development Code, in addition to amendments to the General Plan in the form of the amendments to elements and land uses under the General Plan Update and DTSP. These actions have the potential to result in impacts to the environment which are analyzed throughout this EIR.

# 2.2 PROJECT BACKGROUND

## 2.2.1 General Plan Update

Every city and county in California is required to have an adopted comprehensive long-range general plan for the physical development of the county or city and, in some cases, land outside the city or county boundaries (Gov't Code Section 65300). It is a jurisdiction's overarching policy document that defines a vision for future change and sets the guidelines for locating and designing new development, expanding the local economy, conserving resources, improving public services and safety, and fostering community health. The proposed General Plan functions as the City's primary land use regulatory tool. It will be used as the basis for all planning-related decisions made by City staff, the Planning Commission, and the City Council.

Pursuant to California Government Code Section 65302, a general plan must address eight mandated topics: land use, circulation, housing, conservation, open space, noise, environmental justice, and safety. Typically, General Plans cover a timeframe or forecast of 15 to 20 years.

However, housing elements are required to be updated every eight years to comply with the Regional Housing Needs Allocation (RHNA) and Safety Elements are required to be updated upon the update of a housing element or Local Hazard Mitigation Plan, but no less than every eight years to comply with California Government Code Section 65302(g)(6).

The City's existing General Plan was last updated on November 1, 2005 and includes the following elements:

- Land Use
- Housing
- Economic Development
- Community Design
- Circulation
- Public Facilities and Services
- Parks, Recreation, and Trails
- Utilities
- Safety
- Historical and Archaeological Resources
- Natural Resources and Conservation
- Energy and Conservation
- Noise

Each element contains a description of the existing conditions and trends for the element topics, along with goals and policies. The existing General Plan noted a horizon year of 2025. In 2021, the City began conducting outreach and visioning efforts to begin the process of updating the existing General Plan. The proposed General Plan Update would guide the City's growth over a 25-year buildout horizon and would replace the existing 2005 General Plan.

A General Plan Advisory Committee (GPAC) was also formed in 2021 to provide overall direction for the upcoming General Plan Update. The community engagement process included several GPAC meetings, citywide workshops, town halls, study sessions with the Planning Commission and City Council, and coordination with tribal nations. Public feedback from community events and meetings have been incorporated into the planning process and helped shape the proposed the General Plan Update's vision, goals, and policies. The City created a General Plan website at futuresb2050.com to enhance and inform the public process. The website provides all the documents, maps, and meeting agendas, which are available for public download. The website provides the contact information for City staff so that members of the public can send their thoughts and questions about the General Plan Update throughout the process.

### 2.2.2 Development Code Update

To implement the proposed land use and other administrative changes under the General Plan Update, the City's Development (Dev) Code, housed in Title 19 of the San Bernardino Municipal Code, would also be updated. The purpose of the Dev Code, as stated in Section 19.02.20, of Title 19, is to "promote the public health, safety, general welfare and preserve and enhance the aesthetic quality of the City by providing regulations to ensure an appropriate mix of land uses in an orderly manner." The proposed updates to the Dev Code are largely intended to ensure

that the code is consistent with the proposed General Plan Update and DTSP. Therefore, impacts associated with the Dev Code Update would be the same as those under the General Plan Update and DTSP. The following are key components of the Dev Code update:

- Make the residential zone districts exactly the same as the land use designations established in the General Plan.
- Update the procedures and development review process to eliminate the Design Review Committee and replace it with a more streamlined staff-based review with decisions made by the Commission and/or Council.
- Align the permitted and conditional uses in each zone district to be consistent with community expectations and CEQA exemptions.
- Revise the pre-existing non-conforming use process to encourage investment and allow for reasonable expansion of uses.
- Revise the zoning map to follow the land use diagram of the General Plan.

### 2.2.3 Downtown Specific Plan

In addition to adopting a citywide general plan update, the City would adopt a specific plan to implement specific strategies and plans within a section of the City's downtown. The downtown area of the city has both available land for new investment and transit resources to support a significant new population of residents, workers and visitors. It is therefore anticipated that much of the growth under the General Plan Update would occur in the downtown area. Specific plans are intended to provide an additional layer of planning control and detailed standards that may supplement and differ from the underlying zoning regulations. Since the proposed Downtown Specific Plan (DTSP) would be adopted with the General Plan Update and Development Code Update (Dev Code), the zoning requirements under the DTSP will be consistent with the proposed updates to the Dev Code.

The DTSP was prepared in accordance with Govt. Code Sections 65450 through 65457 which provide the requirements for specific plans adopted in the State of California. Per Govt. Code sec. 65451, required components of a specific plan include:

- The distribution, location, and extent of all land uses.
- The standards and criteria by which new development will proceed.
- The proposed distribution, location, extent, and intensity of major components of public infrastructure, such as transportation and utility systems.
- A program of implementation measures, such as financing measures, policies, regulations, and public works projects.

# 2.3 PROJECT LOCATION

The location of the proposed project consists of the entirety of the City of San Bernardino and its sphere of influence (SOI), which forms the geographic scope of the General Plan and Dev Code Updates, and a 621-acre portion of the downtown, which encompasses the DTSP area. As seen throughout this DEIR, separate environmental analyses are provided for impacts of the General Plan and Development Code Updates at the citywide scale and for the DTSP within the DTSP area.

The Dev Code will apply to all land within the city limits except where a specific plan has been adopted. In these areas if the Specific Plan is adopted by ordinance it will contain its own development parameters and requirements.

## 2.3.1 Citywide Setting

The City of San Berardino encompasses approximately 62 square miles (39,680 acres) with approximately 8 square miles (5,120 acres) of unincorporated land that falls within the City's Sphere of Influence (SOI). It is in the center of the urbanized Valley Region of San Bernardino County and approximately 60 miles east of the City of Los Angeles, as shown on Figure 2-1, *Citywide Project Area*. This area composes the geographic scope of both the General Plan Update and Development Code Update and is referred to as the "General Plan Update Area" or "Citywide area".

The city is framed by several major geographical features, including the San Bernardino Mountains to the northeast and east, the Blue Mountains and the Box Springs Mountains to the south, the Cajon Wash to the west, and the San Gabriel Mountains and the Jurupa Hills to the northwest and southwest, respectively. San Bernardino borders the Cities of Rialto to the west, Colton to the southwest, Loma Linda to the south, Redlands to the southeast, Highland to the east, and the San Bernardino National Forest to the north. Due to its location, San Bernardino is situated as a gateway to the mountain resorts and is also a gateway to southern California due to its proximity to the Cajon Pass, a major natural entry from the high deserts and points east. In addition to the Cajon Wash at the city's western border, the Santa Ana River also crosses the southern portion of the city. Several major roadways traverse the city, including State Route (SR) 210, SR-259, Interstate (I) 215, and I-10, which largely forms the southern border of the City.

## 2.3.2 Downtown Area

The DTSP Area consists of approximately 621 acres in Downtown San Bernardino that stretches from east of I-215 until Sierra Way, and from 8th Street to the railroad tracks south of Rialto Avenue. This area is city's historic core and is primarily within City Council Ward 1 with a small portion to the south of Rialto Avenue and west of E Street in Ward 3. It encompasses several

city landmarks, including City Hall, the 43-acre City-owned former Carousel Mall Site, the County Government Center, Meadowbrook Park, and the City Transit Center. The boundaries of the DTSP Area are depicted in Figure 2-2, D*owntown Specific Plan Project Area*.

# 2.4 STATEMENT OF PROJECT OBJECTIVES

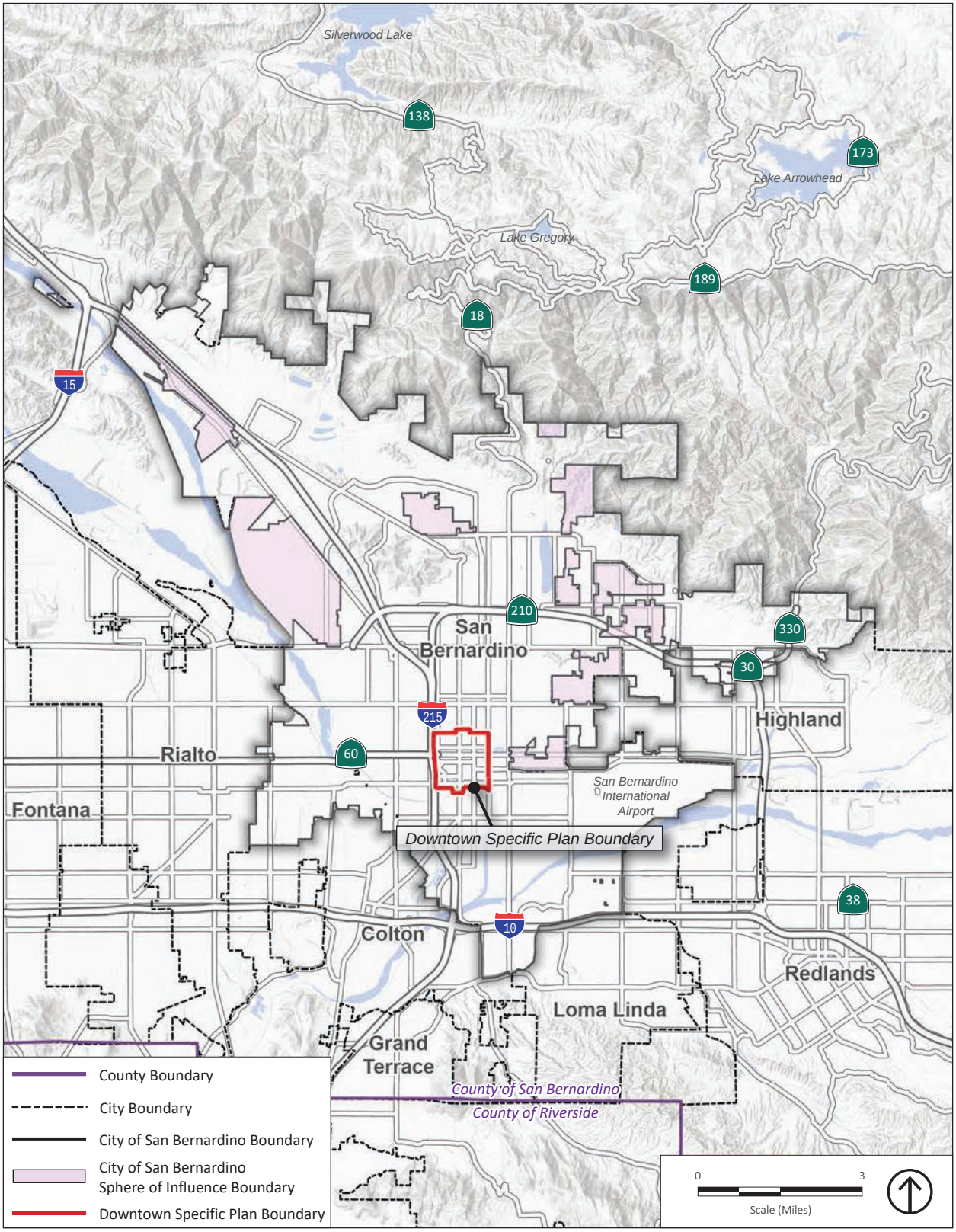
The primary purpose of the proposed project is to update the City of San Bernardino's existing General Plan and Development Code, in addition to adopting a new specific plan for the downtown area. and Pursuant to CEQA Guidelines Section 15124, the following objectives support the proposed project's purpose and assist the City of San Bernardino in developing a reasonable range of alternatives to be evaluated in this EIR.

## 2.4.1 General Plan Update/Development Code Update

1. Provide well-designed and accessible residential neighborhoods and commercial and industrial districts to provide opportunities for people to live, work, and play.
2. Ensure equitable treatment of all residents, businesses, and community groups, while ensuring broad community participation and ownership of the public process.
3. Ensure residents' access to diverse employment opportunities, quality education, safe neighborhoods, reliable public services and infrastructure systems, and a healthy physical environment.
4. Ensure access to dependable, accessible, affordable, and environmentally responsible transportation options.
5. Maintain a robust and resilient economy that nurtures the growth of local businesses, a thriving downtown, emergent and innovative industries, and ensures household prosperity.
6. Foster a vibrant community that supports healthy lifestyles, historical resources, arts, education, and culture for all residents.

## 2.4.2 Downtown Specific Plan

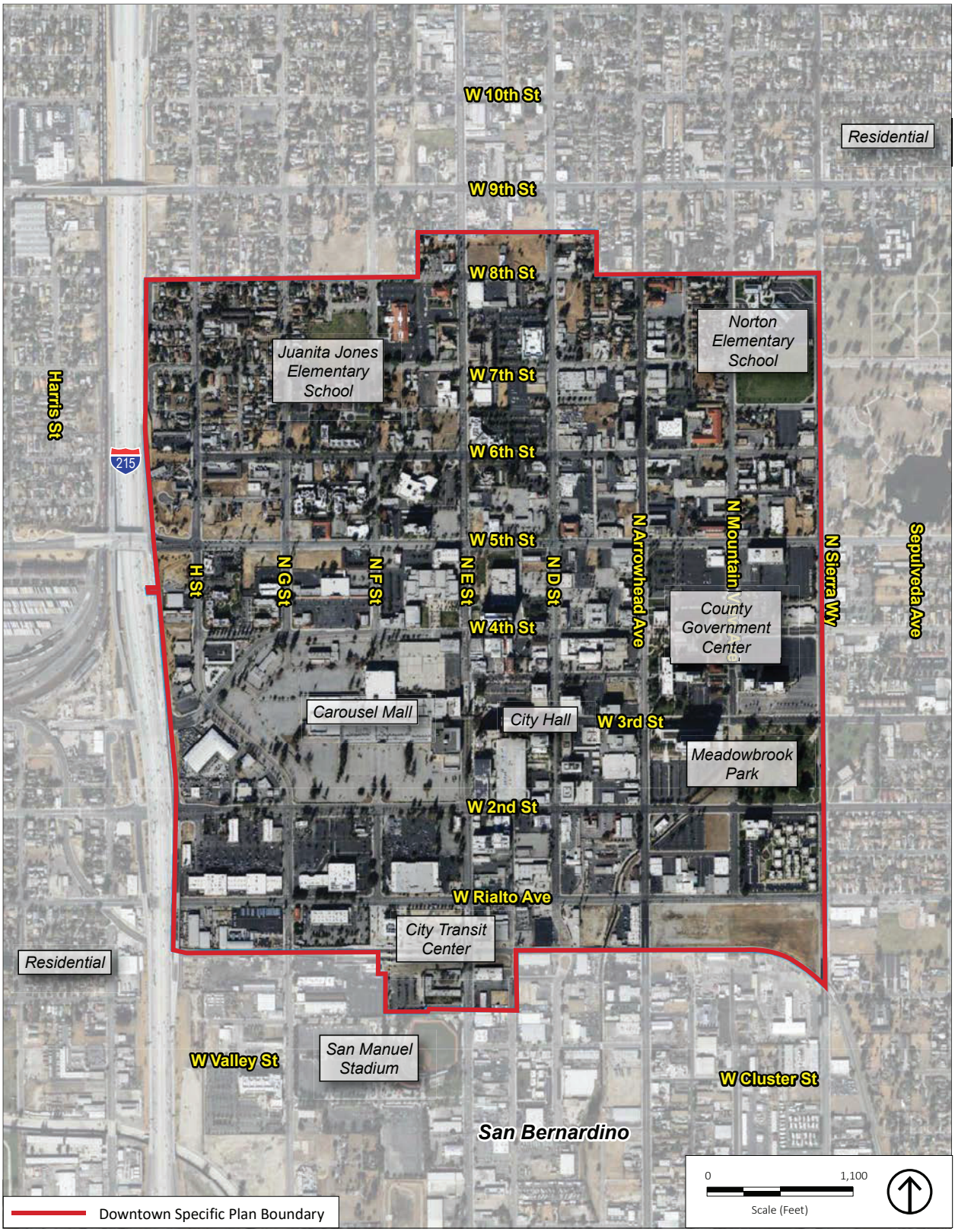
1. Induce private sector investment in Downtown San Bernardino.
2. Transform underutilized and underperforming properties and parking lots in the Downtown into vibrant spaces.
3. Provide for a diverse mix of residential living choices.
4. Expand employment opportunities throughout the Downtown and surrounding area.
5. Ensure a range of quality green and open spaces.




Source: Generated using GIS Pro 2026.

Figure 2-1
**Citywide Project Area**

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Source: Generated using ArcMap 2025.

Figure 2-2
**Downtown Specific Plan Project Area**

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6. Promote sustainable and mixed-use development that creates a network of connected streets, parks, walkways, and vibrant street-level storefront commerce that will create an activated environment and a sense of security and safety.
7. Reduce automobile dependency by creating a compact, pedestrian-oriented, mixed-use environment within walking distance of transit.
8. Leverage the extraordinary access to existing rail and bus transit by linking land use with transportation.
9. Encourage green building design, including sustainable technologies such as rooftop gardens and agriculture, stormwater management, photovoltaic energy sources, and other renewable and conservation technologies.

# 2.5 GENERAL PLAN UPDATE

This section provides a summary of the components of the proposed General Plan Update, also known as "San Bernardino 2050". This includes a discussion of the proposed elements, the proposed Land Use Plan, and the buildout of the General Plan Update.

## 2.5.1 General Plan Update Format and Elements

The General Plan Update covers 12 elements. This includes seven required elements: land use, housing, circulation, open space and conservation, noise, safety, and environmental justice and health, and five additional permissive elements: economic development; public facilities and services; parks, recreation and trails; cultural resources; and utilities and infrastructure. This General Plan Update organizes each element by chapters and includes 12 chapters in total. Each element is encompassed within a separate chapter of the General Plan document and includes an introduction to the element, an outline of its vision, background information about each of the element's sub-topics, a goal that addresses each sub-topic, and accompanying policies for each goal. An optional implementation chapter is also included, which lists the programs and actions to implement each policy within the elements and identifies the department responsible for implementation and the time frame for implementation of the program/action.

The following is a discussion of the components included in each of the elements. The proposed Land Use and Urban Form Element is also discussed in further detail in Section 2.5.2, *Land Use*, below.

### LAND USE AND URBAN FORM ELEMENT

The Land Use and Urban Form Element describes policy direction and criteria for development, including building intensity and population density. Land use designations are used to depict the general distribution, location, and extent of public and private uses of land. These designations

are expressed in the City's Land Use Plan map. The Land Use and Urban Form Element ensures the provision of a range of land uses to support the community's vision of diverse housing options, including affordable housing, and a vibrant economy and provides direction on how land uses should relate to one another to safeguard safety and compatibility. The Land Use and Urban Form Element is organized in the following sections:

- Goals and policies universally applicable to all land use districts, activity centers, corridors, and natural features of the community regardless of their specific location.
- Policies and standards that uniquely apply to each type of land use permitted by the Land Use Plan, including residential, commercial, industrial, open space, and other uses.
- Targeted guidance for the conservation and vitalization of the uniquely distinct districts and places that provide identity and contribute to the quality of life for San Bernardino's residents.

The proposed Land Use and Urban Form Element would also incorporate the 2005 General Plan's Urban Design Element. The proposed designations and changes to the 2005 General Plan are further described below.

## ECONOMIC DEVELOPMENT ELEMENT

The Economic Development Element establishes a framework to leverage the City's assets and guide investments in business, human capital, and infrastructure through 2050. It is based around three objectives for the vision of economic development in the City of San Bernardino:

- Creating new business, jobs, and services that may be absent, inadequate, or inequitably distributed today;
- Sustaining and improving human and social capital among the City's residents, thereby improving quality of life; and
- Generating increasing municipal revenues that the City can increasingly reinvest in the community's quality of life.

It also addresses four sub-topics that have an accompanying goal and policies, including:

- Thriving Local Economy and Regional Jobs Center to guide business retention/growth, startups, and attraction strategies.
- Economic Activity Centers, Districts, and Corridors to provide tailored guidance for a highly differentiated city and markets.
- Economic Security to create equitable opportunities for business success, financial security and upward mobility.
- Fiscal Resilience, to ensure that economic development strategies further the long-term fiscal health of the city.

## CIRCULATION AND MOBILITY ELEMENT

The Circulation and Mobility Element contains the general location and extent of existing and proposed major transportation components and local public utilities, and plans for a balanced, multimodal transportation network that serves the community's mobility needs. The element addresses following topics:

- Vehicular Circulation
- Active Transportation
- Public Transit
- Goods Movement
- Transportation Demand Management
- Parking & Curb Management
- Emerging Technologies
- Vision Zero
- Regional Circulation
- Climate, Adaptation, Resilience
- Complete Streets

The driving goals Circulation and Mobility Element include:

- Apply Complete Streets principles to accommodate multiple transportation modes and offer travelers the ability to access their destinations using their preferred transportation choice.
- Prioritize implementation of the Local Roadway Safety Plan and Active Transportation Plan to improve safety, connectivity, and accessibility on the City's multi-modal network.
- Plan, design, and build streetscapes and roadways to complement planned land uses and advance placemaking in the pedestrian realm in priority areas.
- Maintain and rehabilitate the roadway system, as needed, to ensure a functional roadway transportation network.
- Partner with transit agencies to expand transit services that connect neighborhoods and residents to employment, reduce vehicle use, and support active transportation.
- Manage the movement of goods to support the local, regional, and global economies while minimizing negative externalities to residents and other sensitive populations.
- Regulate on-street and off-street parking to reduce excessive parking, balance loading, short-term parking, and permanent parking need to accommodate a variety of uses.
- Embrace innovative technologies including adaptive traffic signal control to make roadways safer while creating a more connected, efficient, and sustainable transportation system.

- Capitalize on funding opportunities to invest in the future of the City's transportation system.

## NOISE ELEMENT

The Noise Element identifies sources of noise and vibration in the City and supports a pattern of land uses intended to minimize exposure to excessive noise and vibration while identifying areas or neighborhoods that may need to be shielded from excessive noise. The Noise Element also includes solutions to address existing and foreseeable noise, reduce noise where needed, and establish standards for acceptable noise. The element contains the following sections:

- Planning context on the regulatory context surrounding noise and vibration in San Bernardino.
- Noise, including principal sources of noise, standards and regulations, and noise contour mapping.
- Vibration, including principal sources of vibration, standards and regulations, and noise contour mapping.

The Noise Element is guided by the following vision:

- Reduction of transportation noise impacts on sensitive uses through erecting barriers, establishing setbacks, and use of sound-absorbing materials.
- Mitigating the effects of construction and demolition by regulating hours of operation and encouraging use of quieter equipment.
- Vibration control to prevent structural damage and discomfort from trains, heavy vehicles, industrial operations, and construction activities.
- Establishing mixed-use and entertainment areas that integrate noise insulation to protect residential spaces while maintaining lively activity.
- Preservation of quiet zones in parks, residential areas, and other spaces where tranquility is prioritized.
- Enforce noise standards, adopt active noise control, and maintain equipment to reduce long-term operational noise.

## HEALTH AND ENVIRONMENTAL JUSTICE ELEMENT

The Health and Environmental Justice Element is a new element added to the City’s General Plan pursuant to the Planning for Healthy Communities Act, codified in California Government Code §65302(h)(1), which requires that cities with a designated “disadvantaged community” adopt environmental justice policies, objectives, and goals in their general plan. This element identifies the City’s disadvantaged communities and characterizes the burdens faced by these communities with respect to environmental justice. While this element addresses many of the

sub-topics covered by other elements in the General Plan Update, it aims to provide further direction for ensuring equitable access to resources and protection from environmental pollution. The sub-topics addressed include:

- Reduction of pollution exposure
- Improvement of air quality
- Provision of quality parks and recreational facilities
- Promotion of access to healthy food choices
- Ensure safe, sanitary, and healthy housing
- Promotion of equitable access to public facilities and services
- Active community engagement in public decision

## PUBLIC FACILITIES AND SERVICES ELEMENT

The Public Facilities and Services Element establishes the City's vision and goals for maintaining high quality public services and facilities, police and fire protection, libraries and educational facilities, health and medical facilities. This element addresses the sub-topics of:

- Education and libraries
- Public safety services
- Environmental programs
- Capital planning

Each of these sub-topics are addressed with a goal in addition to accompanying policies.

## PARKS, RECREATION, AND TRAILS ELEMENT

The Parks, Recreation, and Trails Element addresses the City's priorities for providing parks and recreational opportunities for residents of the city. It also sets the framework for identifying, preserving, and enhancing open space resources, parks, and recreational assets. It addresses four sub-topics including:

- Inventory of parks and associated facilities (refer to the Open Spaces and Conservation Element for open space amenities).
- Recreational facilities, programs, and activities administered or supported by the City of San Bernardino.
- Bicycle routes and natural trails that are maintained by or within the City of San Bernardino.
- Community events that are sponsored or supported by the City of San Bernardino.

This element also establishes the City's standards for park facility access which are to provide five acres of parkland for every 1,000 residents and to distribute parks and facilities throughout the city so residents can access their local parks within a 10-minute walk from their home. The element notes that the City currently has a shortfall in park facility access at two acres for every 1,000 residents.

## UTILITIES AND INFRASTRUCTURE ELEMENT

The Utilities and Infrastructure Element discusses strategies to ensure the City has a plan in place to provide clean water, sanitation services, energy, waste collection, and communication services. The City oversees the design, construction, operation, and maintenance of utility infrastructure to ensure that it adheres to City engineering standards. The City is also responsible for ensuring that periodic investments are made to maintain the serviceability of the utility infrastructure. Through the goals and policies of this element, the City intends to facilitate the development and maintenance of its utility infrastructure to meet the following priorities:

- A sewer system that utilizes state-of-the-art technology to effectively treat effluent and reduce environmental hazards.
- A flood control system that protects residents from hazards and helps to recharge groundwater resources.
- A water infrastructure system that provides clean and healthy water for a range of potable and nonpotable uses.
- A diversified energy portfolio that helps supply the City's power needs and become more energy resilient.
- A telecommunication system that provides choices for residents, business, students, and other stakeholders.

These priorities also reflect the sub-topics addressed in this element. Background is provided on sub-topic before the accompanying goal and policies are provided. These sub-topics include:

- Wastewater, including the collection, transfer, processing, and recycling of wastewater.
- Water Resources, including the supply, quality, transmission, and reclamation of water for land uses in San Bernardino.
- Storm Drains, including the major county and local flood control facilities for land uses in San Bernardino.
- Energy Resources, including the generation, storage, use, and conservation of conventional and alternative resources.
- Telecommunications and other communication technology for residential, business, and government uses.

## SAFETY ELEMENT

The Safety Element addresses the City's plan for reducing exposure to natural and human-caused hazards and maintaining programs that provide an effective response to these hazards. The Safety Element serves the following purposes:

- Facilitates the identification and mitigation of hazards, thus strengthening codes, project review, and permitting processes.
- Strengthens hazard preparedness planning and post-disaster reconstruction policies.
- Identifies how hazards are likely to increase in frequency and intensity due to climate change.
- Presents policies and programs directed at identifying and reducing hazards and improving community resiliency.

This element provides goals and policies for seven sub-topics including emergency preparedness and response, hazardous materials and waste, flood hazards, geologic and seismic hazards, wind hazards, wildfire hazards, and climate change hazards.

## CULTURAL RESOURCES ELEMENT

The Cultural Resources Element provides the basis for continued efforts by the City and partner organizations to preserve, enhance, and maintain sites and structures that are deemed architecturally, historically, archaeologically, and/or culturally significant. It provides a background on the city's history and recognized cultural resources in addition to goals and policies on the sub-topics of:

- Cultural Resources Program, which covers the City's plan to document, protect, and communicate about the city's cultural resources.
- Historic Resources Preservation, which addresses the protection and preservation of sites, buildings, and districts of historical significance in the City.
- Archaeology and Paleontology, which provides direction for ensuring that archaeological and paleontological resources are protected during future development projects.
- Creative Arts, which addresses the City's plan to expand creative arts and cultural facilities programs in the city.

This element would replace the former Historical and Archaeological Resources Element of the 2005 General Plan.

## OPEN SPACE AND CONSERVATION ELEMENT

The Open Space and Conservation Element outlines the Citty's efforts to conserve, preserve, and steward the natural assets of the city to ensure that these resources are sustained for future generations. The City's vision for natural resources is balancing the needs of the built environment and natural environment. The element aims to provide a policy framework that:

- Preserves unique or significant natural features of the city—hillsides, waterways, and other topographical features.
- Minimizes adverse impacts to biological resources from development—e.g., plants, animals, and natural features.
- Manages the City's water resources to provide a reliable supply of water for residents, businesses, and the environment.
- Utilizes mineral resources efficiently while ensuring that adverse current and future impacts are mitigated.
- Enhances quality of life by reducing harmful emissions and maintaining air quality.

Following this vision, the element includes goals and policies for the following five sub-topics:

- Natural environment, including mountains, rivers, hillsides, and features that provide home to wildlife and habitat or have historical, archaeological, or cultural significance.
- Opportunities to preserve, enhance, and expand a network of open space to support habitat, recreation, natural resources, cultural resources, water management, and aesthetics.
- Water resources, including the reclamation of land and waters, prevention and control of water pollution, and the protection of waterways and watersheds.
- Mineral resources, including their location, quantity, and quality (including rock, sand, and gravel) as well as the prevention and correction of the erosion of important soils.
- Air quality protection and stewardship of air resources in the community to promote a healthier future for San Bernardino residents.

This updated element combines and replaces the 2005 General Plan's Energy and Conservation Element and Natural Resources and Conservation Element.

## HOUSING ELEMENT

The Housing Element directs the City's policies, programs, and land use planning to address the needs of both existing and future residents. This includes planning and facilitating the production of new housing; the improvement and preservation of existing housing; the promotion of affordability for current households; and the affirmative furtherance of fair housing.

Unlike other elements, the Housing Element must be reviewed and certified by the state and is subject to specific requirements under California state law, including the requirement to update the Housing Element every eight years. The City's 6th Cycle 2021-2029 Housing Element was certified by the Department of Housing and Community Development and adopted by the City on February 21, 2024. The Housing Element underwent environmental review at the time of its adoption and therefore, is not explicitly analyzed as part of the General Plan Update in this DEIR. However, as described below, the proposed Land Use Plan and Dev Code Update reflect the rezoning/re-designations needed to meet the City's Regional Housing Needs Allocation, as described in the Housing Element. The buildout of the General Plan Update also incorporates the capacities of the sites identified in the Housing Element.

## 2.5.2 Land Use

### EXISTING LAND USE

The City of San Bernardino is home to a wide variety of urban, suburban, and rural development patterns, offering a mix of residential neighborhoods, commercial corridors and centers, industrial districts, civic and educational facilities, parklands, and open spaces. Table 2-1, *Existing Land Use by Acreage*, categorizes land within the City by land use type. Figure 2-3, *Existing Citywide Land Uses*, shows the existing on-the-ground land uses in the city.

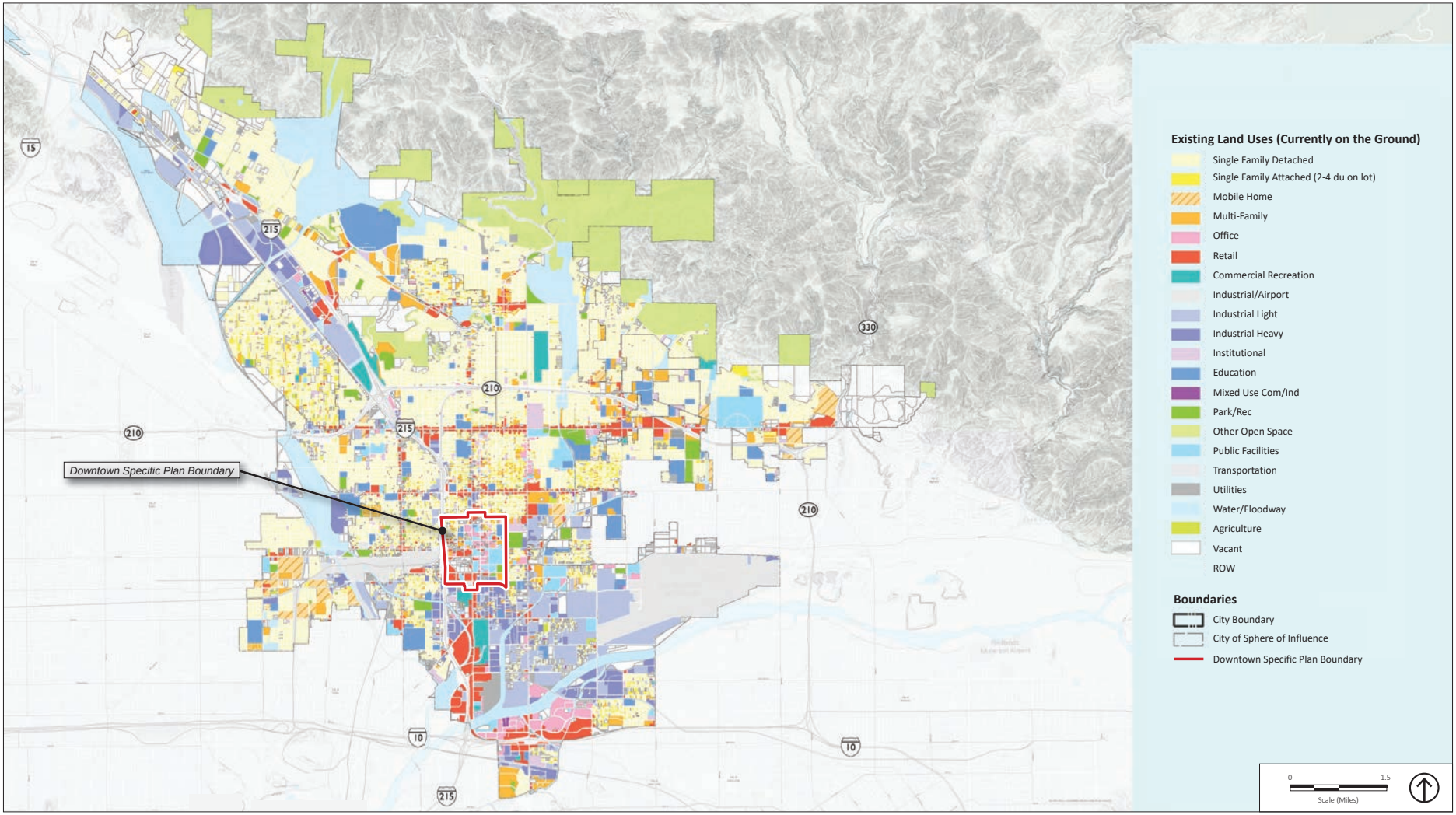
**Table 2-1 Existing Land Use by Acreage**

| | City | | | SOI | | |
|---|---|---|---|---|---|---|
| **Land Use** | **Acres** | **Dwelling Units** | **Non-Res. Sq.Ft.** | **Acres** | **Dwelling Units** | **Non-Res. Sq.Ft.** |
| Agriculture | 35 | 4 | - | 7 | - | 15,151 |
| Single Family Detached | 8,124 | 39,166 | 6,527 | 2,353 | 7,271 | 3,400 |
| Single Family Attached | 355 | 6,773 | 1,497 | 114 | 845 | 1,100 |
| Multi-Family | 807 | 15,889 | 19,714 | 46 | 685 | - |
| RV and Mobile Home | 516 | 4,245 | - | 27 | 230 | - |
| Commercial | 1,488 | - | 18,821,253 | 38 | - | 230,951 |
| Office | 486 | - | 7,017,159 | 7 | - | 17,302 |
| Commercial Recreation | 345 | - | 555,572 | - | - | - |

**Table 2-1 Existing Land Use by Acreage**

| | City | | | SOI | | |
|---|---|---|---|---|---|---|
| **Land Use** | **Acres** | **Dwelling Units** | **Non-Res. Sq.Ft.** | **Acres** | **Dwelling Units** | **Non-Res. Sq.Ft.** |
| Industrial-Light | 2,655 | - | 36,370,554 | 120 | - | 1,091,389 |
| Industrial-Heavy | 407 | - | 629,111 | - | - | - |
| Airport | 1,415 | - | 1,525,109 | - | - | - |
| Parks/Recreation | 466 | - | - | 3 | - | - |
| Other Open Space | 2,549 | - | 14,215 | 523 | - | - |
| Water/Floodway | 3,720 | - | 2,181 | 325 | - | 866 |
| Public Facility | 613 | - | 6,562,340 | 19 | - | 182,286 |
| Institutional | 387 | - | 3,994,057 | 32 | - | 159,120 |
| Education | 1,531 | 132 | 14,270,010 | 51 | - | 414,082 |
| Transportation | 751 | - | 219,518 | 76 | - | - |
| Utilities | 291 | - | 308,655 | 4 | - | 10,690 |
| Vacant | 6,924 | 3 | 287,621 | 911 | - | - |
| Under Construction | 30 | 49 | - | - | - | - |
| ROW | 6,052 | - | - | 637 | - | - |
| **TOTAL** | **39,945** | **66,261** | **90,605,093** | **5,292** | **9,031** | **2,126,337** |

Source: City of San Bernardino and PlaceWorks 2021.




Source: PlaceWorks 2025.

Figure 2-3
**Existing Citywide Land Uses**

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## Existing Land Use Plan

The 2005 General Plan organizes the City's Land Use Plan into a three-tiered hierarchy. The first and most basic tier described in the 2005 General Plan is the *Foundation Component Plan*, which functions as the City's existing General Plan Land Use Diagram. It broadly describes the fundamental pattern, type, and distribution of uses allowed on each parcel of land. The acreages of each land use in the first tier of the City's existing Land Use Plan are shown in Table 2-2, *Existing Land Use Plan Acreages*. The second tier is titled the *General Plan Land Use Map* and functions as the land use plan that implements the City's Zoning Map and development regulations. Therefore, these designations correspond to the City's Development Code zoning designations. This tier of the 2005 General Plan's Land Use Plan is shown in Figure 2-4, *2005 General Plan Land Use Plan*.[1] The third tier of land use guidance includes the existing Strategic Areas within the city. The 2005 General Plan provides detailed policy guidance tailored to address unique issues in these areas.

**Table 2-2 Existing Land Use Plan Acreages**

| Land Use | Acres |
|---|---|
| Single Family Residential | 11,605 |
| Multi-Family Residential | 2,807 |
| Commercial | 3,344 |
| Industrial | 3,4501 |
| Open Space | 1,384 |
| Public/Quasi-Public | 5,2801 |
| Specific Plan | 11,069 |
| Right-of-Way | 28 |
| **TOTAL** | **38,968** |

## PROPOSED LAND USE PLAN

The proposed Land Use Plan intends to consolidate the City's existing three-tier Land Use Plan into one map with a single set of designations. It would also consolidate many of the redundant existing second tier designations that are reflected in the existing Zoning Map of the

[1] Because the second tier of the 2005 General Plan Land Use Plan also aligns with the Zoning Map in existing Development Code (Title 19), this figure also shows the City's existing zoning.

Development Code. Table 2-3, *Proposed Land Use Designations Comparison*, summarizes the land use designations under both the 2005 General Plan and the proposed General Plan Update. Figure 2-5, *General Plan Update Land Use Plan*, shows the proposed Land Use Plan map.

## Table 2-3 Proposed Land Use Designations

| General Plan Update | | | |
|---|---|---|---|
| **Designation** | **Description** | **Density** | **Acreage** |
| **Residential** | | | |
| Estate Residential (RE) | Provides for the development of housing on estate residential lots of minimum one acre or through clustering techniques for areas that have significant site constraints or important visual and natural resources. | 1 DU/acre | 1,922 |
| Residential Low (RL) | Allows for the development of housing on minimum 1/4-acre lots, which may include estates in residential subdivisions with trails and open spaces, which are typically on the northern and lower density edges of the city. | 4 DU/acre | 3,522 |
| Residential Suburban (RS) | Allows for the development of single-family homes to protect existing single-family areas and comparable infill development. Also allows new single-family subdivisions that are comparable in scale with neighborhoods. | 7.2 DU/acre | 7,417 |
| Residential Medium Density (RM) | Allows for predominantly lower-scaled attached and detached multi-family homes, including duplexes, triplexes, fourplexes, townhomes, courtyard housing, and apartments along with limited local-serving commercial and professional office uses. | 16 DU/acre | 2,870 |
| Residential High Density (RH) | Allows for predominantly multiple-family residential uses, including apartment buildings, townhomes, row houses, stacked residential flats, and other high density residential uses along with local-serving commercial and professional office uses. | 32 DU/acre | 327 |
| **Commercial** | | | |
| Office Commercial (CO) | Allows the continued use, expansion, and development of administrative and professional offices (such as financial, insurance, legal), hospitals, and supporting retail in proximity to major transportation corridors. | 1.5 FAR | 127 |

## Table 2-3 Proposed Land Use Designations

| General Plan Update | | | |
|---|---|---|---|
| **Designation** | **Description** | **Density** | **Acreage** |
| Neighborhood Commercial (CN) | Applies to small parcels, allows convenience retail, neighborhood offices, and service activities in single-story buildings designed to serve the adjacent neighborhood. Also allows for mixed uses in varying configurations at a density similar to Residential Medium Density. | 0.5 – 1.5 FAR, 16 DU/acre | 216 |
| Corridor Commercial (CC) | Predominantly oriented for major thoroughfares and shallow lots, allows small scale, neighborhood-serving commercial, professional offices, and services, along with the potential for mixed uses, built in varying configurations, at a density similar to Residential Medium Density. | 0.7 – 2.0 FAR, 16 DU/acre | 697 |
| Regional Commercial (CR) | Allows predominantly regional-serving commercial uses of the highest intensity, including corporate and professional offices, large-scale retail commercial, entertainment, financial, hospitality, supporting retail and services, etc. | 0.7-3.0 FAR: 0.7 Commercial 1.5 Research/Dev 3.0 Office/Hotel, 16 DU/acre | 600 |
| **Mixed-Use Centers and Corridors** | | | |
| Mixed-Use Neighborhood (MX-NBD) | Allows for commercial uses such as convenience, grocery, and drug stores and service businesses, restaurants, and similar uses near neighborhoods. This designation also allows for mixed-use buildings, both vertical and horizontal, or for a single use | 0.0 – 1.5 FAR, 32 DU/acre | 259 |
| Mixed Use Corridor (MX-COR) | Applies to parcels fronting major roadways or corridors. A site may be developed as free-standing commercial or high density residential or one in which uses are vertically integrated in the same building or horizontally on the site. | 0.7 – 2.0 FAR, 40 DU/acre | 231 |
| Mixed Use Center (MX-CTR) | Allows for a mix of uses with amenities to enhance pedestrian experience. Allows retail, restaurants, offices, commerce, housing, | 0.7 - 3.0 FAR, 60 DU/acre | 297 |

**Table 2-3 Proposed Land Use Designations**

| General Plan Update | | | |
|---|---|---|---|
| **Designation** | **Description** | **Density** | **Acreage** |
| | hotels, and community facilities. Buildings may have a mix of uses, either stand alone, vertical or horizontal configurations. | | |
| **Industrial** | | | |
| Industrial Flex (IF) | This designation allows for smaller-scale manufacturing and limited warehousing and distribution, typically less than 50,000 square feet, with limited supporting commercial and professional office uses for the industrial uses. | 1.0 FAR | 447 |
| Industrial (I) | Allows for development of large-scale manufacturing and processing of goods and materials, ware-housing, distribution centers, and similar truck- or logistics-focused land uses, along with limited supporting commercial and professional office uses. | 1.0 FAR | 3,347 |
| Industrial Extractive (IE) | Allows for existing mineral, sand and gravel operations that have received an approved Mining Permit/Mineral Reclamation Plan in accordance with the California SMRA. Also allows for interim uses that do not preclude mineral extraction and processing. | 0.05 FAR | 199 |
| **Public Facilities** | | | |
| Public Facilities (PF) | Allows for a range of public facilities, including governmental agencies, police and fire stations, transportation facilities, water and wastewater treatment, public and private schools, colleges and universities, museums, parks, and public libraries. | Case-by-case basis | 2,745 |
| Flood Control | Flood control facilities. | Case-by-case basis | 4,411 |
| Open Space (OS) | Allows land for permanent open space, including washes; steep hillsides where development is not feasible; publicly owned landscaped areas; and other lands intentionally reserved as undeveloped areas, particularly in north San Bernardino. | N/A | 115 |

### Table 2-3 Proposed Land Use Designations

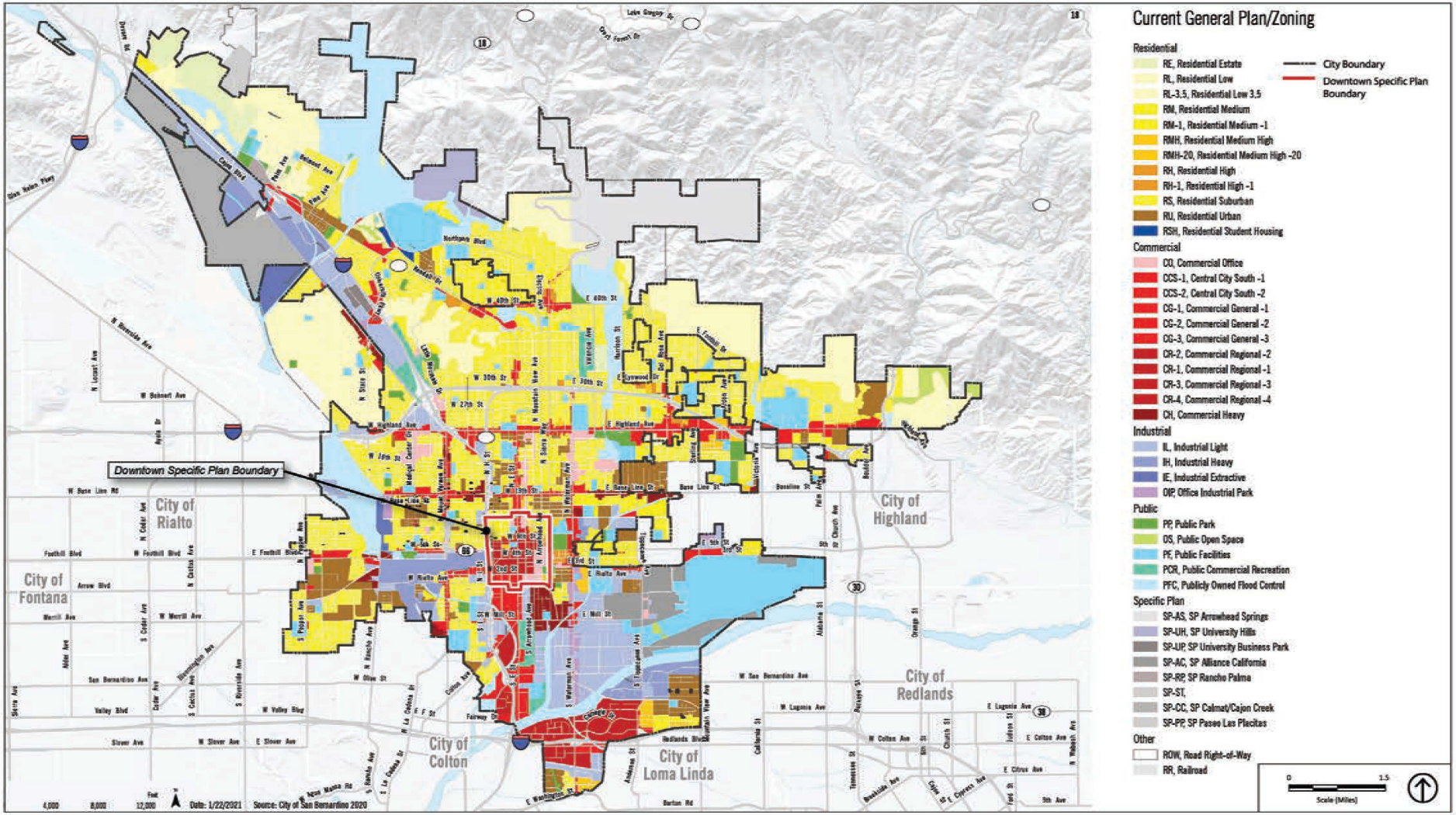
| General Plan Update | | | |
|---|---|---|---|
| **Designation** | **Description** | **Density** | **Acreage** |
| Public/<br>Commercial Recreation (PCR) | Allows for existing and future public and private commercial recreation facilities, including but not limited to the National Orange Show Grounds, public and private golf courses, and similar public and commercial recreational opportunities. | Case-by-case basis | 356 |
| Airport | Allows for the expansion of the San Bernardino International Airport and related facilities, manufacturing, warehousing, and distribution centers. Land uses are determined by the San Bernardino International Airport per the Land Use Compatibility Plan. | 1.0 FAR | 1,302 |
| **Specific Plans** | | | |
| Specific Plan (SP) | Downtown<br>Calmat-Cajun Creek<br>Alliance California<br>Rancho Palma<br>Spring Trails<br>University Hills<br>Arrowhead Springs<br>Airport Gateway | Subject to the standards in the Specific Plans | 6,560 |

Notes:

DU = dwelling units

FAR = floor area ratio

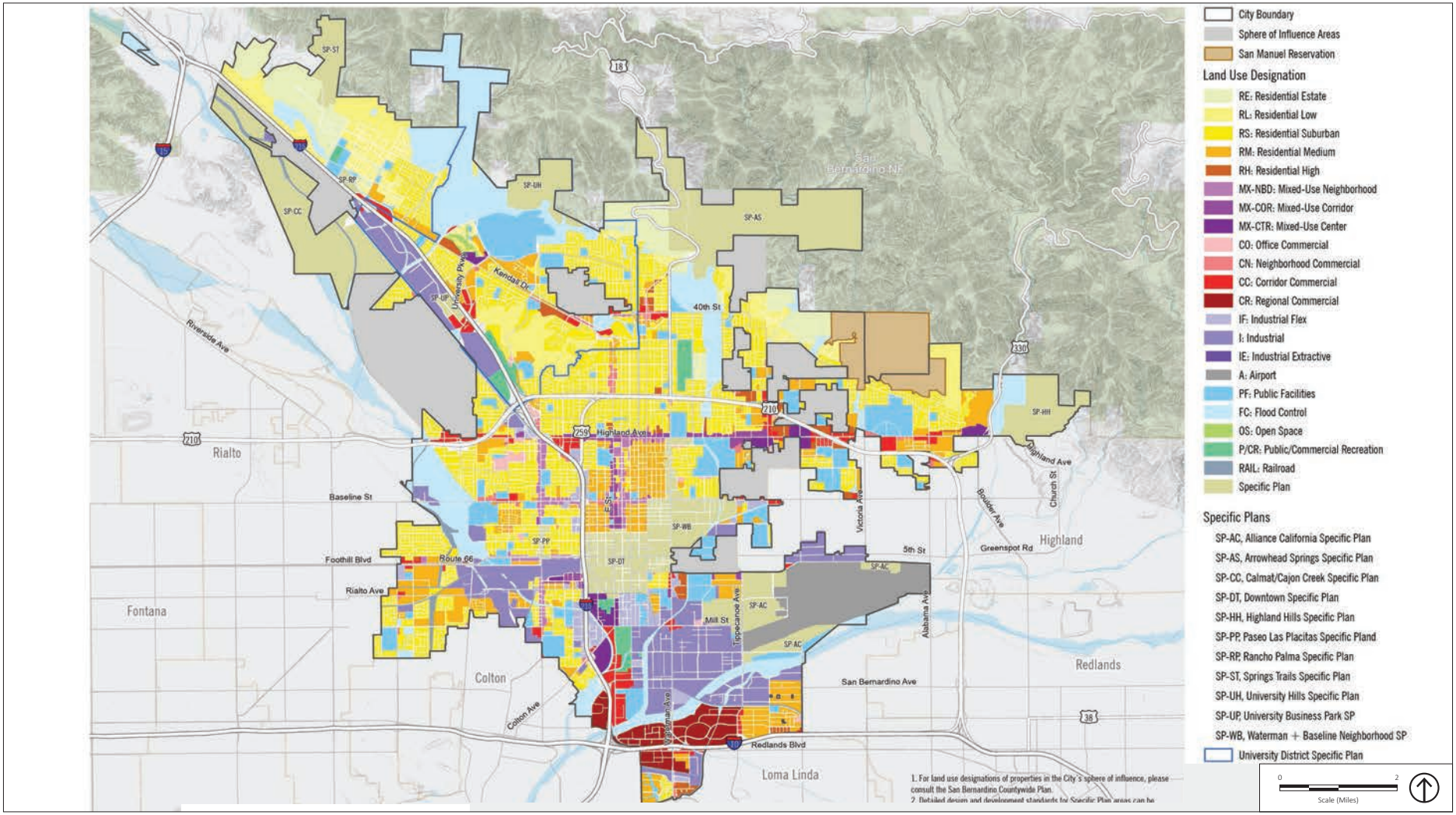
The area of land within the San Manuel Reservation within the City limits accounts for an additional 477 acres.




Source: PlaceWorks 2021.

Figure 2-4
**2005 General Plan Land Use Plan**

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Source: PlaceWorks, City of San Bernardino 2026

Figure 2-5
**General Plan Update Land Use Plan**

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The proposed Land Use Plan focuses growth and development inward in the form of infill and intensification of vacant and underutilized properties within the City's existing urbanized areas, while preserving the uses and densities of its established residential neighborhoods and open spaces. Growth on the city's periphery, in its foothills and undeveloped lands, is limited to the uses and densities permitted by existing zoning. Primary growth under the proposed Land Use Plan would occur in the downtown, under the DTSP which concentrates new retail, office, government, and housing use in a pedestrian-oriented environment. Existing retail commercial centers with extensive surface parking and segments of commercial corridors would also be intensified with a mix of expanded commercial and new housing development to evolve as key activity centers and destinations for the community and surrounding neighborhoods. Figure 2-6, *General Plan Update Strategy Areas*, identifies these commercial and mixed use corridors and centers where this growth is expected to occur, in addition to nine Strategic Areas that have additional policy guidance in the proposed Land Use Plan.

The land use categories for the existing Land Use Plan and zoning in the Dev Code would be amended to accommodate a greater diversity of uses and, in some locations, density/intensity of use, with its most significant changes intended to permit residential development in areas previously limited for commercial development consistent with recent state legislation. The proposed Land Use Plan also include the following new designations:

- **Mixed-Use**. New "mixed-use" categories are introduced where an integrated mix of commercial and housing development is permitted. These differentiate areas oriented to and serving adjoining neighborhoods from those of greater intensity serving the greater community and along corridors.
- **Industrial Flex**. A new category, "Industrial Flex," is intended to prescribe locations in which large, warehousing uses will be limited, while promoting the creation of districts integrating a diversity of uses that are ancillary to and supporting the primary industrial function such as office parks and restaurants.
- **Specific Plans**. Areas encompassed by existing adopted Specific Plans, including the proposed DTSP, are designated accordingly on the Land Use Plan and will be guided by their land use designations and development standards.

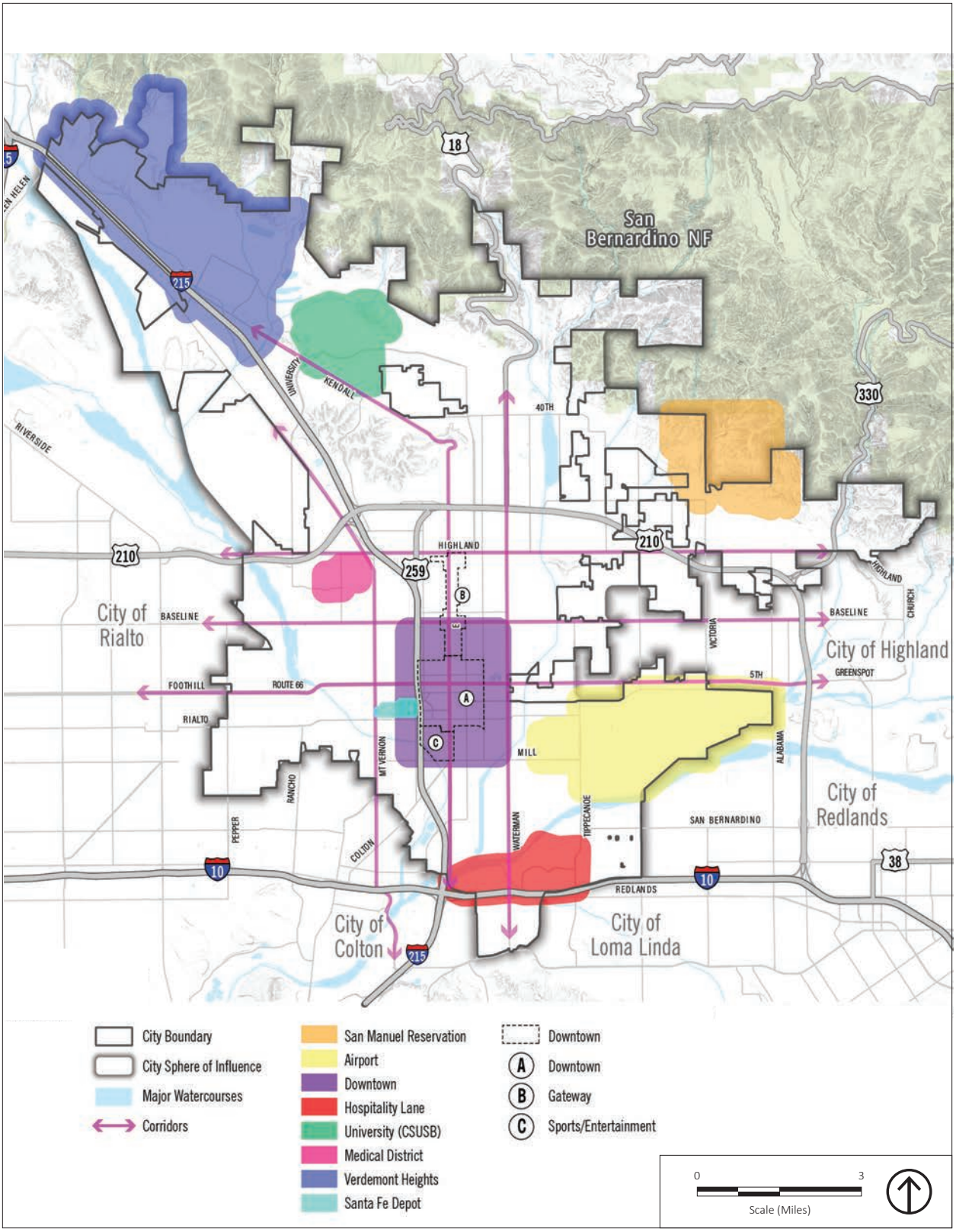
## Strategy Areas

The proposed Land Use and Urban Form Element has also developed separate policies for specific areas of the City referred to as Strategy Areas. These areas are shown in Figure 2-6 and further described below:

- **Downtown San Bernardino.** In addition to the DTSP (see description of this separate component of the proposed project below), the proposed General Plan Update includes policies that reiterate the City's vision to revitalize the downtown area and capitalize on its proximity to transit amenities. The General Plan Update and DTSP intend to increase the

residential capacity of the downtown area and prioritize pedestrian-friendly streetscapes. These policies apply to same geographic area as the DTSP.

- **Downtown Gateway.** This area is intended to serve as a transition from the university-related uses to the north and the higher density downtown area to the south. Under the General Plan Update, this area would allow for increased density for offices, residential, commercial uses, and mixed uses to capitalize on its proximity to the SBX Bus Rapid Transit Corridor.
- **Sports and Entertainment District**. This area, located south of downtown, is intended as a new sports and entertainment district surrounding the San Manual Stadium and the National Orange Show. Under the General Plan Update, this area would host entertainment venues, restaurants, commercial recreation, offices, and apartments and condominiums clustered along a landscaped pedestrian promenade connecting the district with the transit center and Downtown.
- **University District**. This area, surrounding California State University San Bernardino, is envisioned an active district that would extent the educational and cultural facilities of the university into the community and provide housing, commercial services, restaurants, entertainment, recreational, and similar uses for students, faculty, and staff.
- **Airport District**. Policies for this district would provide direction for future development and buildout of the San Bernardino Airport and adjacent uses. The General Plan Update anticipates that the airport will continue to expand its volume of cargo transportation and passenger flights. Businesses benefiting from the District Airport and the Foreign Trade Zone will continue to locate and expand on adjoining land.
- **Santa Fe Depot District.** The historic Santa Fe Deport currently serves as a transit hub for Amtrak and Metrolink. Under the General Plan Update, existing buildings would be adaptively reused for transit-related uses, restaurants, food halls, retail commercial, or office uses. Properties adjoining the station are envisioned for a mix of related and supporting uses, including residential uses.
- **Hospitality Lane.** Currently developed with more than 900 businesses, this district is envisioned to develop with higher intensities as employment district that serves as a gateway to the City and a regional destination. Connected to the region by the freeway and the Metrolink, Hospitality Lane would support corporate headquarters, high end hospitality uses, and restaurants and support services, which will fuel this robust center of employment for the city and the region.
- **Medical Office District.** In the properties surrounding the Dignity Health-Community Hospital, the General Plan Update would allow for multi-story medical buildings and professional offices that comprise the medical district and support the hospital.




Source: PlaceWorks, City of San Bernardino 2026

Figure 2-6
**General Plan Update Strategy Areas**

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- **Verdemont Heights.** This residential area in the northwestern portion of the City is planned for three subareas, connected by corridors, signage, parks, and trails. Verdemont Estates, located west of Little League Drive, would allow for residential estate use. Verdemont Hills would allow low and suburban residential uses with the northern portion subject to regulations in the Hillside Management Overlay. Verdemont Plaza, the third subarea, is adjacent to Interstate 215 near Palm Avenue and Cable Creek and would allow commercial uses oriented toward travelers from I-215.

### Corridors Revitalization

Major thoroughfares in the City including Mt. Vernon Avenue, E Street, Baseline Street, Highland Avenue are facing vacancy and underutilization due to shifts in market conditions and travel patterns. The proposed General Plan Update includes policies that focus on revitalization and reinvestment of these corridors under the following steps:

- Allowing a greater mix of residential and commercial uses.
- Implementing marketing campaigns to promote the corridors.
- Enhancing physical infrastructure (e.g., water, sewer, utility).
- Improving aesthetics (streetscapes, lighting, trees, etc.).

### Summary

In summary, the major changes under the proposed Land Use Plan consist of the following:

- Consolidation of the three-tier land use plan under the 2005 General Plan into one Land Use Plan map.
- Consolidation and reorganization of existing designations in the 2005 General Plan to reduce redundancy, comply with state law, and reflect existing conditions.
- Reorganization of the topics addressed in the land use elements and new policies for different topic areas.
- Consolidation of the existing Community Design Element into the Land Use Element.

## LAND USE BUILDOUT

During the 25-year planning horizon (referred to as “buildout” throughout this DEIR) of the General Plan Update, the City could potentially grow by 35,940 dwelling units, 63,624 residents, 41.17 million square feet of nonresidential space, and 60,500 jobs compared to existing conditions, as shown in Table 2-4, *General Plan Update Buildout Summary.*

**Table 2-4 General Plan Update Buildout Summary**

| Scenario | Housing Units | Population | Nonresidential Square Feet | Employment |
|---|---|---|---|---|
| Existing Conditions (2025) | 77,051 | 267,267 | 101,575,944 | 111,690 |
| Proposed General Plan (2050) | 112,991 | 330,982 | 142,744,306 | 172,190 |
| **Potential Growth** | **35,940** | **63,624** | **41,168,362** | **60,500** |

Source: See Appendix B, Buildout Memorandum

These projections are based on the capacity of vacant sites, sites with existing development that are likely to be redeveloped near transportation corridors, growth in specific plans, and projects in the development pipeline. The buildout projections also align with the site capacities identified in the Housing Element and the buildout projected under the DTSP component of the proposed project. The development capacities of the sites included in the buildout are based on the following assumptions:

- **Residential sites** are assumed to develop at 85 percent of the maximum capacity of their land use designation under the proposed Land Use Plan.
- **Commercial sites** are assumed to develop at 65 percent of the maximum intensity (FAR) of their land use designation under the proposed Land Use Plan.
- **Industrial sites** are assumed to develop at 80 percent of the maximum intensity (FAR) of their land use designation under the proposed Land Use Plan.
- **Mixed-Use sites** are assumed to develop at 80 percent of the maximum intensity (FAR) and 85 percent of their maximum density under their designation in the proposed Land Use Plan.

Additional assumptions regarding the buildout of the summarized in Appendix B, *Buildout Memorandum*.

## Housing Element Sites

As noted, the buildout of the General Plan Update includes growth in the areas identified in the certified Housing Element as suitable for housing development by 2029. The General Plan Update would accommodate 35,940 new housing units, which would include 8,123 new required units pursuant to RHNA. Changes in State law (SB 166 and SB 1333) require local jurisdictions to continue to monitor their ability to accommodate its RHNA as development occurs on available sites at an intensity or income level not consistent with the assumptions used in the Housing Element. To address this requirement, the City's sites inventory for RHNA includes an 11 percent buffer for the RHNA.

# 2.6 DOWNTOWN SPECIFIC PLAN

The DTSP is specific plan for the City's downtown area that would be adopted along with the proposed General Plan Update and the accompanying Dev Code Update. It proposes a set of focused strategies to transform Downtown San Bernardino into a vibrant and livable center of community identity and activity. The DTSP consists of a vision statement, objectives, and planning principles; land use, mobility, and infrastructure plans; development standards; design guidelines; an implementation plan; and an economic development strategy. The chapters of the DTSP, as referenced in this DEIR, consist of the following:

- Chapter 1, Executive Summary
- Chapter 2, Downtown Context & History
- Chapter 3, Specific Plan Introduction
- Chapter 4, Downtown Vision
- Chapter 5, Downtown Districts
- Chapter 6, Land Use Plan
- Chapter 7, Development Standards
- Chapter 8, Mobility and Infrastructure
- Chapter 9, Administration and Implementation

## 2.6.1 Existing Land Uses

As described above, the DTSP area covers an approximately 621-acre area of the City's downtown. Its northern and southern boundaries are at 8th Street and the railroad tracks to the south of Rialto Avenue, respectively. It is bounded to the east and west by Sierra Way and I-215. Land uses in the north and west of the DTSP area consist of residential neighborhoods characterized by one- to three-story single-family homes, duplexes, triplexes, and 4-plexes. To the west of the DTSP area, I-215, the San Bernardino Depot Rail yard, and other industrial uses create a barrier between neighborhoods and commercial areas. The southern area of the DTSP is largely characterized by commercial and industrial centers. Much of the land in the east and central portions of the DTSP is developed with civic uses for government buildings. Table 2-5, *Existing Development in the Downtown Specific Plan Area*, describes the existing residential units and non-residential space in the DTSP Area.

**Table 2-5 Existing Development in the Downtown Specific Plan Area**

| Land Use | Units |
|---|---|
| Residential Dwelling Units | 1,315 |
| Nonresidential Square Feet | 3,840,449 |

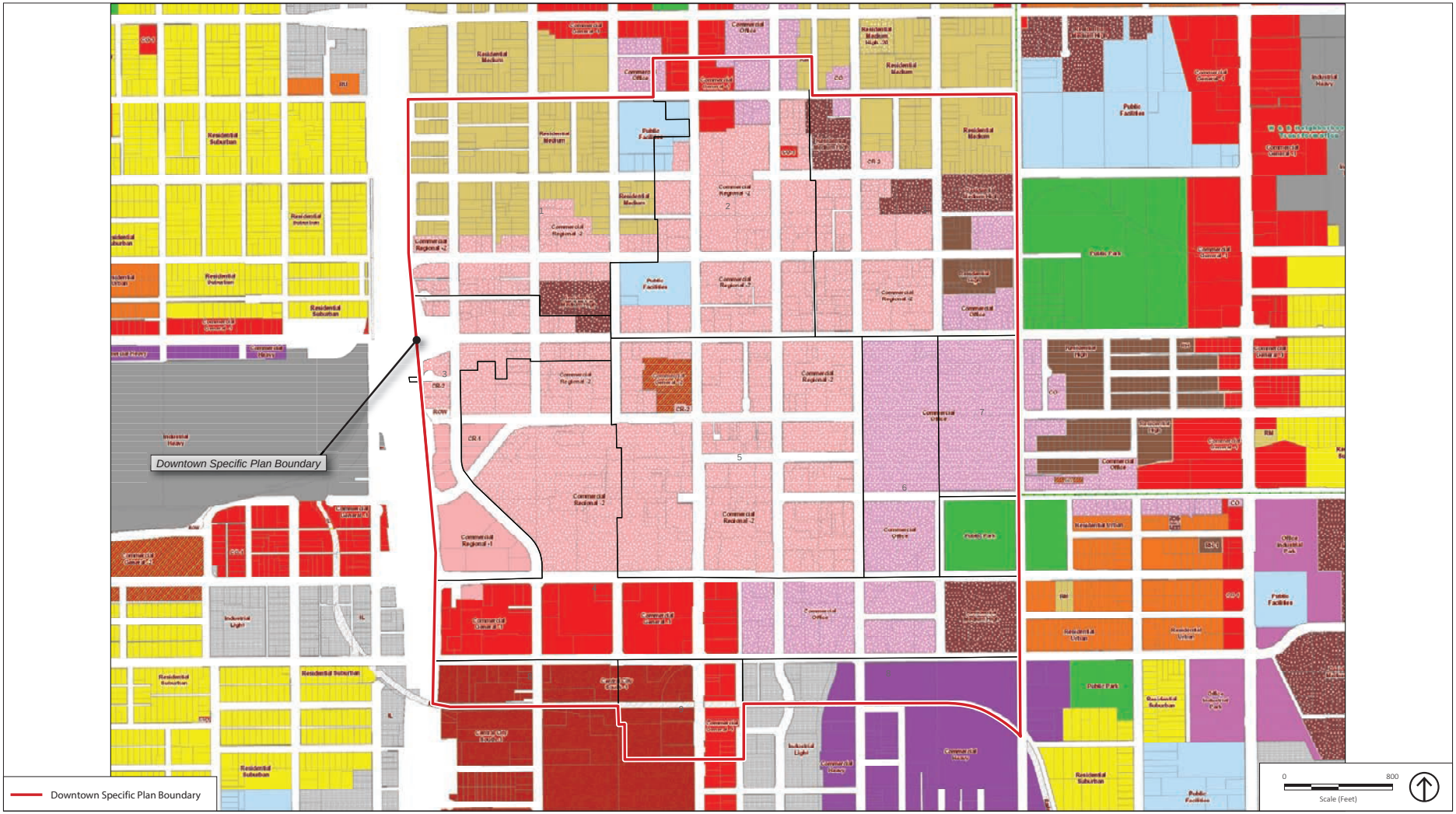
Source: PlaceWorks 2023.

As shown in Figure 2-7, *Existing Land Uses in the Downtown Specific Plan Area*, the DTSP area is primarily designated and zoned with commercial uses.[2] The Commercial Regional- Downtown (CR-2) designation encompasses a large portion of the area between 2nd Street and 7th Street, west of Arrowhead Avenue, while much of the land east of Sierra Way, west of Arrowhead Avenue and north Rialto Avenue, south of 2nd Street, is designated Commercial General (CG-1) and Commercial Office (CO). These areas also contain pockets of Residential Medium High-designated sites that are developed with existing multi-family and single-family housing. The northern portions of the DTSP area between 7th and 8th Streets are primarily designated Residential Medium. The acreages of existing land uses in the DTSP area are summarized in Table 2-6, *Existing Land Use Designations in the Downtown Specific Plan Area*.

**Table 2-6 Existing Land Use Designations in the Downtown Specific Plan Area**

| Land Use Designation | Acreage |
|---|---|
| Commercial Regional- Malls (CR-1) | 13 |
| Commercial Regional- Downtown (CR-2) | 197 |
| Commercial General (CG-1) | 40 |
| Commercial General (CG-2) | 4 |
| Commercial Office (CO) | 78 |
| Commercial Heavy (CH) | 12 |
| Central City South-1 (CCS-1) | 21 |
| Industrial Light (IL) | 5 |
| Residential Medium High (RMH) | 25 |
| Residential Medium (RM) | 50 |
| Residential High (RH) | 6 |
| Public Facilities (PF) | 12 |
| Public Park (PP) | 8 |
| Railroad (RR) | 2 |

[2] As described in Section 2.5.2, the second tier of the City's existing Land Use Plan aligns with its adopted zoning designations in existing Development Code. Figure 2-7 shows both the existing land use and zoning for the DTSP area.




Source: PlaceWorks 2022.

Figure 2-7
**Existing Land Uses in the Downtown Specific Plan Area**

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## 2.6.2 Land Use and Development Standards

The vision for the DTSP is organized around nine proposed Land Use Districts in the DTSP area. The DTSP outlines the land uses and development standards for each District, which would become the new land use and zoning for the DTSP area, functioning as a form-based code. The Districts are largely organized based on the intensity of uses permitted, which range from the most urban to the least urban types of development and land use, with most of the zones providing for a significant mixture of land uses. This approach differs from conventional zoning maps that typically divide areas into zones on a parcel-level and rigidly segregate residential, commercial, industrial, and institutional uses into separate areas. The use of zones based on development intensity, instead of land use as the spatial basis for regulating development, directly reflects the functions of and relationships between each part of the DTSP area. The zones also effectively implement the City's urban design objectives for each District to establish and maintain attractive distinctions between District.

These Districts consist of the following, as shown in Figure 2-8, *Proposed Downtown Specific Plan Land Use Districts*:

- **North Gateway**: This District encompasses two neighborhoods at the northwest and northeast portions of the DTSP Area. The DTSP anticipates infill development of compatible, modestly sized, 2- to 3-story residential buildings in this District, and supports the conservation of existing residential uses, especially owner-occupied units.
- **North Gateway**: This District encompasses properties fronting E and D Street between 8th and 5th Street. In addition to existing institutional uses, such as the Feldheym Library, the historic US Post Office and San Bernardino Police Department Headquarters, the district contains a number of vacant or under-utilized buildings and parcels. The DTSP would allow for new 4- to 5-story mixed-use developments that promote pedestrian activity along E and D Streets as well as residential infill.
- **Freeway Commercial:** This District, located along I-215 encompassing an area around 2nd Street to 5th Street, includes various auto-oriented businesses such as the Fairview Ford Dealership, carwashes, and drive-through fast-food restaurants that benefit from immediate proximity to the I-215 freeway and the freeway on-off-ramps at 5$^{th}$ Street. The DTSP intends to maintain and expand current auto-oriented uses in this District.
- **Transit Neighborhood**: This District encompasses a major portion of the Carousel Mall site in addition to the block between 2nd Street and Rialto Avenue. This neighborhood would permit a range of uses with an emphasis on high-intensity residential to take advantage of proximity to both the Transit Center and Downtown Core. The DTSP anticipates that big-box retail stores common in the District will be replaced with 4- to 8-story mixed-use structures with pedestrian-oriented sidewalk frontage facing tree-lined streets and small pocket parks or plazas, within an emphasis on residential and mixed-use.

- **Downtown Core:** This District contains the densest concentration of commercial uses, government offices, entertainment and cultural offerings. The City Hall and foreign consulates are located here, as many of Downtown's historic structures. Residential is allowed within the Downtown Core, but it is not predominant land use. The Downtown Core also includes a significant portion of the Carousel Mall Site. The DTSP would allow additional mixed-use with an emphasis on residential, high-rise buildings.
- **County Center:** This District encompasses the primary County of San Bernardino administrative offices, including the County Courthouse and the Superior Court of California. The County plans to expand its offices north of the existing County Government Center which would help to integrate these facilities into the rest of Downtown. The DTSP provides standards that would support this development.
- **Parkview Campus:** This District consists of County-owned land adjacent to the County Center District and Meadowbrook Park. The County intends to development a mixed-use campus consisting of housing, office, and other commercial and government uses under a Master Plan. The DTSP's land use and development standards would be consistent with this vision for the District.
- **Railside**: This District forms a majority of the southern boundary of the DTSP Area along the Metrolink Railroad tracks. Properties in the District were historically developed with industrial uses needing rail access. The DTSP intends to maintain the industrial character of the District but transition from heavy industry to both office and artisan-type manufacturing such as breweries that will both enhance the downtown and accept rail-adjacencies. Residential would also be permitted in this district with conditions.
- **Transit Center:** This District focused on the Downtown San Bernardino Transit Center. Much of the land in this District is developed with transportation uses under existing conditions. The DTSP identifies opportunities to develop other properties in the vicinity with transit-supporting developments, including mixed-use residential structures up to 6 stories. The DTSP also aims to enhance pedestrian connections from transit stations to the surrounding downtown.

Table 2-7, *Summary of Development Standards by Land Use District*, provides an overview of the development standards for each proposed Land Use District in the DTSP. In addition to traditional development standards for each District, the DTSP also defines standards for site design and building form, setbacks and frontages, open space, materials and finishes, materials and finishes, and parking.

**Table 2-7 Summary of Development Standards by Land Use District**

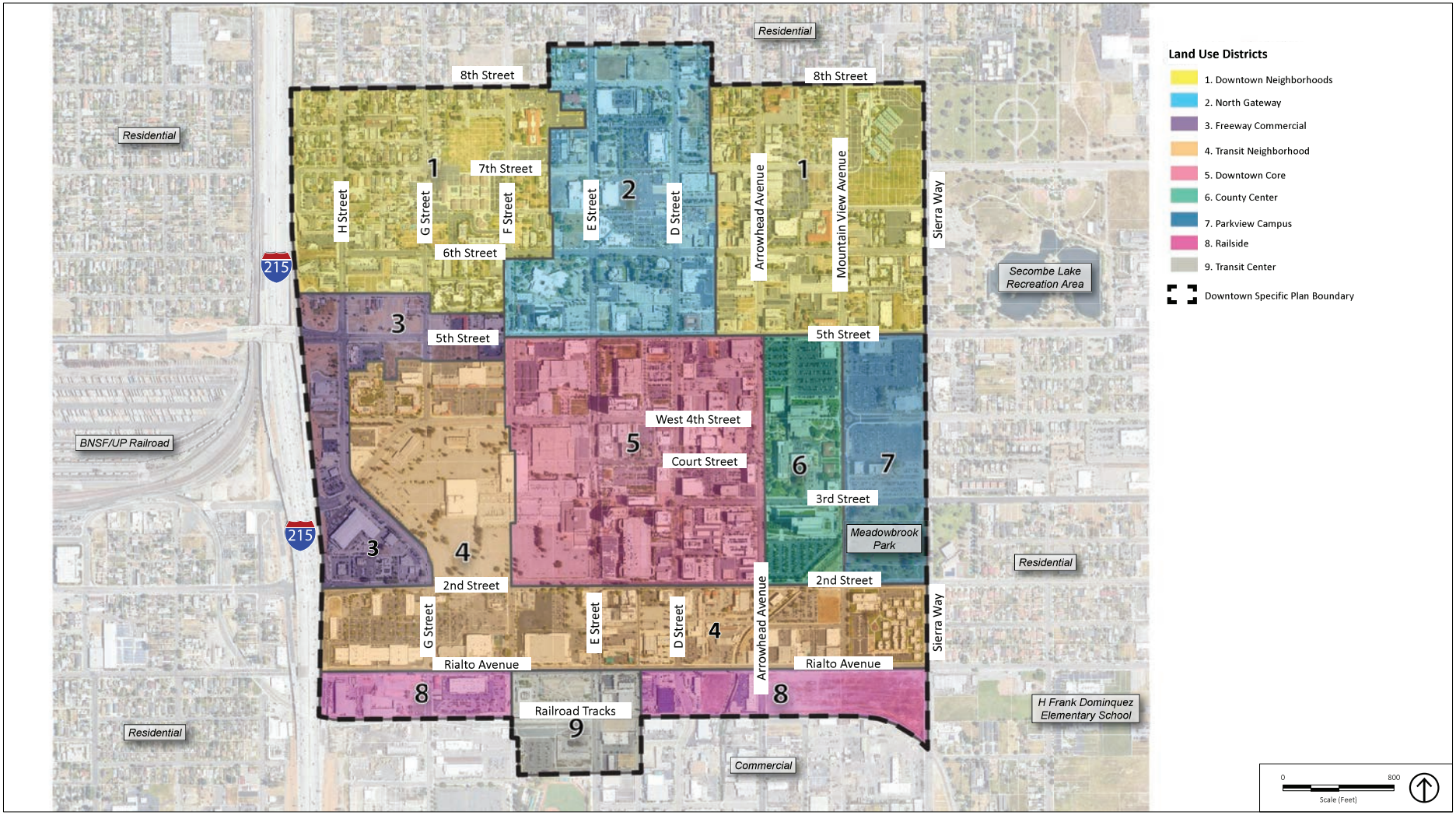
| Development Standard | Downtown Core | Transit Neighborhood | Transit Center | Railside | County Center | Parkview Campus | Downtown Neighborhoods | North Gateway | Freeway Commercial |
|---|---|---|---|---|---|---|---|---|---|
| Maximum Building Height | No limit | 6 floors / 80’ | 6 floors / 80’ | 4 floors / 75’ | 12 floors / 120’ | 8 floors / 95’ | 3 floors / 35’ | 5 floors / 60’ | 2 floors / 35’ |
| Minimum Ground Floor Height | 18’ non-res, 10’ res | 15’ non-res, 10’ res | 18’ non-res, 10’ res | N/A | N/A | 15’ non-res, 10’ res | N/A | 15’ non-res, 10’ res | N/A |
| Minimum Number of Floors | 3 floors 1 (does not include Mezzanine) | 3 floors | 3 floors | N/A | N/a | 3 floors | N/A | 3 floors | N/A |
| Maximum Residential Density | 175 DU/ac | 100 DU/ac | 100 DU/ac | 80 DU/ac | Not Permitted | 100 DU/ac | 35 DU/ac | 100 DU/ac | 35 DU/ac |
| Maximum Intensity | 5.0 FAR | 3.0 FAR | 3.0 FAR | 2.5 FAR | 3.0 FAR | 3.0 FAR | 1.75 FAR | 3.0 FAR | 0.5 FAR |
| Setbacks Required? | No | No | No | No | No | Yes | No | Yes | No |
| Façade Articulation Required? | No | Yes | No | No | No | Yes | No | Yes | No |
| Height Averaging Permitted? | No | Yes | No | No | No | Yes | No | Yes | No |

Notes: See Chapter 7, Development Standards, of the DTSP for the full list of District development standards

DU = dwelling unit

FAR = floor area ratio

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Source: PlaceWorks 2023.

Figure 2-8
**Proposed Downtown Specific Plan Land Use Districts**

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### 2.6.3 Mobility and Infrastructure

The DTSP's Mobility and Infrastructure chapter discusses existing and planned mobility and infrastructure improvements for the DTSP area. It outlines specific roadway improvements for corridors in the DTSP area and defines a "roadway priority type" for each of these corridors. These roadway priority types consist of pedestrian, transit, bicycle and auto and are used to define the type of roadway improvement prioritized at the corridor. The DTSP also provides prototype streetscapes for the F Street corridor through the Carousel Mall site and plan for street trees across all major corridors.

The infrastructure discussion provides an overview of the existing public utilities that service the DTSP area, including localized drainage and flood control, wastewater/sewage treatment, and water supply and distribution. It also discusses the impact of future land use development on these systems as the DTSP is implemented.

### 2.6.4 Administration and Implementation

The DTSP's Administration and Implementation chapter provides the mechanisms for the City to review and approve project applications within the DTSP area. It also addresses the phasing, funding, and financing mechanisms that guide public and private improvements/new development over time. With respect to future environmental review of development under the DTSP, this EIR is intended to serve as a programmatic EIR covering all potential development pursuant to the DTSP. Future development is intended to tier from the analysis presented in this document, including development that proposes "minor modifications" to the DTSP. As outlined in Section 9.2.2 of the DTSP, the DTSP's minor modification process is intended to grant minor relief from its development standards. Minor modifications may include:

- Adjustments to development regulations by no more than 10 percent.
- Adjustments to allowable projections and encroachments if consistent with the Uniform Building Code.
- Modifications necessary to comply with final Conditions of Approval or mitigation measures when adopted under subsequent action.
- Addition of information to the DTSP (text or map changes) for purposes of clarification provided that the additions do not change the intent of the plan or regulations.
- Adjustments to the alignment, location, and sizing of utilities and facilities, or a change in utility and/or service provider, as approved by the City's Engineering or Public Works Department.
- Final adjustments to the Circulation Plan, including roadway alignment, sizing, traffic control techniques, and access locations, as approved by the City's Engineering or Public Works Department.

Development approved pursuant to the minor modification process is assumed to be within the scope of this EIR and not subject to further environmental review.

## 2.6.5 Downtown Specific Plan Buildout

Under implementation of the DTSP, the DTSP area is projected to grow by 14,152 new residential units and 11,732,858 square feet of nonresidential space by 2050. Table 2-8, *Total Development in the Downtown Specific Plan Area*, shows the existing and projected development in each Land Use District. Table 2-9, *Downtown Specific Plan Buildout Summary*, summarizes the overall growth in the DTSP area under the DTSP.

**Table 2-8 Total Development in the Downtown Specific Plan**

| District Area | Existing Residential Units | New Residential Units | TOTAL | Existing Non-Residential (square feet) | New Non-Residential (square feet) | TOTAL |
|---|---|---|---|---|---|---|
| Downtown Neighborhood | 776 | 971 | 1,747 | 1,146,787 | 63,630 | 1,210,417 |
| North Gateway | 173 | 1,505 | 1,678 | 392,335 | 409,812 | 802,147 |
| Freeway Commercial | 24 | 0 | 24 | 89,279 | 191,649 | 280,928 |
| Transit Neighborhood | 342 | 5,872 | 6,214 | 310,781 | 3,288,686 | 3,599,467 |
| Downtown Core | 0 | 3,768 | 3,768 | 1,219,479 | 4,689,452 | 5,908,931 |
| County Center | 0 | 0 | 0 | 551,547 | 1,057,332 | 1,608,879 |
| Parkview Campus | 0 | 1,184 | 1,184 | 25,983 | 662,978 | 688,961 |
| Railside | 0 | 262 | 262 | 71,595 | 854,961 | 926,556 |
| Transit Center | 0 | 590 | 590 | 32,663 | 514,357 | 547,020 |
| **TOTAL** | **1,315** | **14,152** | **15,467** | **3,840,449** | **11,732,857** | **15,573,306** |

**Table 2-9 Downtown Specific Plan Buildout Summary**

| | Existing | Proposed | Growth |
|---|---|---|---|
| Population | 5,293 | 40,912 | 35,618 |
| Households | 1,465 | 13,367 | 11,902 |
| Housing Units | 1,315 | 15,467 | 14,152 |
| Non-Residential Square Feet | 3,840,449 | 15,573,306 | 11,732,857 |
| Employment | 10,850 | 21,839 | 10,989 |

# 2.7 DEVELOPMENT CODE UPDATE

Title 19 (Land Use/ Subdivision Regulations) of the San Bernardino Municipal Code is the primary tool for implementing the goals, objectives, and policies of the Land Use and Urban Form Element, pursuant to the mandated provisions of the State Planning and Zoning Law (Government Code Section 65000 et seq.), CEQA (Public Resources Code Section 21000 et seq.), and other applicable State and local requirements. The zoning regulations, including development standards, permits and procedures, zones, and zone descriptions, that are contained in Title 19 would be revised to be consistent with the exhibits and text of the General Plan Update.

## OVERLAY ZONES

The Dev Code provides additional guidance for areas within overlay zones, as shown in Table 2-10, *Development Code Update Overlay Districts*.

**Table 2-10 Development Code Update Overlay Districts**

| Overlay Zone | Purpose |
|---|---|
| HM: Hillside Management Overlay | To ensure that hillside development occurs in a manner that protects natural and topographic character, landforms, biological resources, aesthetics, and public health, safety, and general welfare. Density varies from 0.1 to 2.0 units/acre in accordance with the municipal code. |
| FF: Foothill Fire Zone Overlay | To help prevent and mitigate the spread of wildfires, help to minimize associated property damage, and reduce the risk to the public health and safety for properties located in moderate, high, and extreme hazard areas of the City. |
| FP: Flood Plain Overlay | To protect public health, safety, and general welfare along with public facilities and infrastructure, and to minimize hazards due to flooding and mud debris flows in areas identified by the latest Flood Insurance Rate Maps. |
| TOD: Transit Overlay | To allow and encourage an appropriate mix and intensity of land uses around transit stations that foster transit usage, economic growth, infill and redevelopment, walkways and bicycling, amenitized streetscapes, improved air quality, and high-quality neighborhoods. |
| A: Airport Overlay | To promote the public health, safety and general welfare in the vicinity of airports by minimizing exposure to crash hazards and high noise levels generated by airport operations and to encourage future development that is compatible with the continued operation of airports.. |
| AR: Adaptive Reuse Overlay | To allow for the repurposing of existing, underutilized commercial and office buildings within the identified overlay area(s) for residential uses, in particular focusing on the adaptive reuse of historical buildings. |
| GH: Geologic Hazards Overlay | To provide guidance for development proposed in areas adjacent to active earthquake faults or traces, where landslides or mudslides are prevalent, or where moderate risk of liquefaction is present. |
| BR: Biotic Resources Overlay | To implement General Plan policies regarding the protection and conservation of threatened, rare and endangered plants and animals along with their habitats which have been identified within the City. |

# 2.8 INTENDED USES OF THE EIR

## 2.8.1 Required Permits and Approvals

This Draft EIR is a program DEIR that examines the environmental impacts of the proposed project. This DEIR also addresses various actions by the City of San Bernardino to adopt and implement the proposed project. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling the City of San Bernardino, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. However, there are no specific development projects proposed at this time, and further environmental review by the City may be required as more detailed information and plans are submitted on a project-by-project basis. The anticipated approvals required for this project are in Table 2-11, *Actions Required*.

**Table 2-11 Actions Required**

| Lead Agency | Action |
|---|---|
| City of San Bernardino | ▪ Certification of the Program EIR<br>▪ Adoption of the City of San Berdino General Plan Update (San Bernardino 2050), Development Code Update, and Downtown Specific Plan<br>▪ Adoption of the Findings of Fact and Statement of Overriding Considerations<br>▪ Adoption of the Mitigation Monitoring Program<br>▪ Adoption of any ordinances, guidelines, programs, actions, or other mechanisms that implement the General Plan Update<br>▪ Adoption of the Downtown Specific Plan<br>▪ Adoption of the Development Code Updates |

## 2.8.2 Related Review and Consultation Requirements

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The proposed project is subject to Public Resources Code Section 21080.1(d) and would provide formal notification of the proposed project to Native American tribes that have requested to be on the lead agency's list for receiving notification.

# 2.9 REFERENCES

San Bernardino, City of. 2005, November. *San Bernardino General Plan*. City of San Bernardino. https://www.sanbernardino.gov/DocumentCenter/View/957/General-Plan-November-1-2005-PDF

San Bernardino. 2021. City of San Bernardino General Plan – Existing Conditions Report, Chapter 3.0 Built Environment.

# 3. ENVIRONMENTAL ANALYSIS

## INTRODUCTION

The proposed project is analyzed for potential significant impacts in accordance with Appendix F, "Energy Conservation," and Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines. As used in this DEIR, environmental topics and their corresponding sections and abbreviations are:

| | | | |
|---|---|---|---|
| 3.1 | Aesthetics (AES) | 3.11 | Land Use and Planning (LUP) |
| 3.2 | Agriculture and Forestry Resources (AGF) | 3.12 | Mineral Resources (MIN) |
| 3.3 | Air Quality (AIR) | 3.13 | Noise (NOI) |
| 3.4 | Biological Resources (BIO) | 3.14 | Population and Housing (POP) |
| 3.5 | Cultural Resources (CUL) | 3.15 | Public Services (PUB) |
| 3.6 | Energy (ENE) | 3.16 | Recreation (REC) |
| 3.7 | Geology and Soils (GEO) | 3.17 | Transportation (TRA) |
| 3.8 | Greenhouse Gas Emissions (GHG) | 3.18 | Tribal Cultural Resources (TCR) |
| 3.9 | Hazards and Hazardous Materials (HAZ) | 3.19 | Utilities and Service Systems (USS) |
| 3.10 | Hydrology and Water Quality (HYD) | 3.20 | Wildfire (WIL) |

## ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under the same major headings.

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.
- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based on the CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis.
- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.

- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified and mitigation measures are included as necessary.
- **References** are provided for information sources used in the development of the discussion.

# LEVELS OF SIGNIFICANCE

The level of significance is identified for each impact in this Draft EIR. Although the criteria for determining significance are different for each topic, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines.

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

# SCOPING COMMENTS RECEIVED

The 30-day NOP review period for the proposed project EIR opened on July 21, 2025, and closed on August 19, 2025. Within the review period the City received three written comments and one oral comment during the scoping meeting held on July 30, 2025. The written comments received cover tribal cultural resources, transportation, air quality, and greenhouse gas emissions. Chapter 1, Table 1-1, *Summary of Comments on the NOP*, lists comments received during the scoping period and where they are addressed in the DEIR.

# EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. Pursuant to CEQA Guidelines Section 15064(b), the analysis in this Draft EIR is based on scientific and factual data that has been reviewed by the lead agency and represents the

lead agency's independent judgment and conclusions. This section describes the methodology for the program-level evaluation in Chapters 3.1 through 3.20 with respect to the horizon year, the geographic areas of impacts, the baseline, the application of the proposed General Plan Update goals and policies, effects of the environment on the project, and cumulative impacts.

## 3.5.1 2050 Horizon Development Potential

The proposed project includes policy documents that do not directly result in development without additional approvals. Before any development project can take place consistent with the General Plan and DTSP, the project must be analyzed for consistency with the adopted General Plan, zoning requirements, and other applicable local and State requirements. Only once the consistency analysis is completed can the project then obtain all necessary clearances and permits from regulatory agencies to physically construct.

The 2050 horizon development potential of the proposed project (also referred to as the "buildout") represents the reasonably foreseeable amount of development within the City by 2050, as described in Chapter 2, *Project Description*[1]. Buildout was determined by developing a "buildout model" that estimated how many additional housing units and nonresidential square feet would be needed to support expected population and job growth in the City by the year 2050. Projects that were already in the review "pipeline" or reasonably foreseeable, such as sites identified in the adopted Housing Element's sites inventory, were counted as contributing to future development. To distribute the remaining expected development, the buildout methodology focused on vacant parcels with developable General Plan land use designations, using reasonably foreseeable residential and nonresidential development capacity on each vacant parcel based on the parcel acreage and proposed land use designation density and floor area ratio (FAR)[2] limits.

A summary of the development potential in the City under the proposed General Plan Update is provided in Table 2-4, *General Plan Update Buildout Summary*. Further information about the methodology used to develop these development potential assumptions is in Appendix B, *Buildout Memorandum,* to this DEIR.

## 3.5.2 Geographic Areas of Impact

As described in Chapter 2 and shown in Figures 2-1 and 2-2, the three components of the proposed project differ in their geographic scope. The proposed General Plan and Development

[1] In this context "buildout" does not mean the physical building of every vacant parcel to the maximum development potential allowed by the proposed project. Rather buildout represents a reasonable development potential that could occur by 2050.

[2] FAR = Floor Area Ratio is the ratio of developed building floor area to the total size of the parcel.

Code are applicable to all land within the incorporated city limits. The DTSP applies only to a portion of the City's downtown area. In addition to the incorporated area of the City, the proposed General Plan includes the 5,120 acres of land of the City's sphere of influence (SOI) as adopted by the San Bernardino Local Agency Formation Commission. The Development Code does not apply to the land within the City's SOI. For the purposes of this analysis, the term "citywide" is synonymous with the entire area within the Sphere of Influence.

### DEVELOPMENT CODE UPDATE IMPACTS

The purpose of the proposed Development Code (Dev Code) Update is to revise Title 19 of the City's Municipal Code to implement the changes proposed under the General Plan Update and DTSP. Since the Dev Code Update is limited to changes that will already be analyzed under the General Plan Update and DTSP impacts, impacts of the Dev Code Update would be the same as those under the GPU and DTSP. Because the Dev Code is a citywide component of the proposed project, any impacts specific to the Dev Code Update will be discussed with the General Plan Update.

## 3.5.3 Baseline

This EIR evaluates the impacts of the proposed project relative to existing conditions of the geographic areas of impact described previously, as required by CEQA Guidelines Section 15126.2. Unless otherwise noted, "baseline" represents the existing conditions on the ground (i.e., physical conditions) at the time that the Notice of Preparation was issued (July 21, 2025). As described in Chapter 2, the baseline for the General Plan Update Area and DTSP Area includes the following existing conditions:

### CITYWIDE AREA

- Housing Units: 77,051
- Population: 267,267
- Non-residential Square Feet: 101,575,944
- Jobs: 111,690

### DOWNTOWN SPECIFIC PLAN AREA

- Housing Units: 1,315
- Population: 5,293
- Non-Residential Square Feet: 3,840,449
- Jobs: 10,850

## 3.5.4 General Plan Update Goals and Policies

Policies that will reduce environmental impacts are provided in the impact discussion sections of Sections 3.1 through 3.20 and organized in tables specific to the relevant CEQA Appendix G checklist question. The policies that have the potential to reduce impacts are marked with an asterisk (*).

For each significant impact, the EIR must identify one or more feasible mitigation measures or explain why no feasible mitigation measures are available. CEQA Guidelines Section 15370 defines "mitigation" as: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. An EIR should focus on mitigation measures that are feasible, practical, and effective. Pursuant to CEQA Guidelines Section 12156.4(a)(1)(B), it is ordinarily not appropriate to defer the formulation of mitigation measures until some future time. The CEQA Guidelines acknowledge an exception, explaining that mitigation measures may specify performance standards for mitigating a significant impact that might be accomplished in various ways. Therefore, when it is known that mitigation is feasible, but it is impractical to devise specific measures during the planning process, the agency can commit itself to devising measures that satisfy performance criteria.

PRC Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2) establish that when a project examined in an EIR is a plan (such as a General Plan), policy, regulation, or other public project, mitigation measures may be incorporated into the plan, policy, regulation, or project design. Because this EIR is for a general plan and a specific plan, some policies in the proposed General Plan are required as means to mitigate environmental impacts under CEQA. These policies and actions are fully enforceable at the discretion of the decision-maker; they use the imperative "shall" and are mandatory in all cases. The mitigating policies described in the EIR that are fully enforceable through permit conditions, agreements, or other legally binding instruments and include performance criteria are marked with an asterisk (*) in the tables in the impact discussions of Sections 3.1 through 3.20 of this DEIR to illustrate where the proposed policies would reduce impacts from future development in the City of San Bernardino.

Additionally, the EIR considers the potential for environmental impacts from the implementation of General Plan policies. Amended and new policies collectively reflect the changes to the 2005 General Plan. Substantive General Plan policy changes include the addition, removal, or functional revisions (i.e., not purely semantic) to the text in ways that have the potential to result in a physical impact on the environment. Non-substantive changes include the renumbering of policies or minor text revisions, which do not have the potential to result in a physical change to the environment. The content of the proposed General Plan Update

policies is directly integrated with and reflective of the proposed project as a whole. Therefore, impact discussions for the effects of the proposed project necessarily encompass an analysis of the effects of the substantive policy changes, and those with relevance to CEQA topics are discussed in the appropriate chapters.

### 3.5.4 Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (*CBIA vs. BAAQMD*) that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." The *CBIA vs. BAAQMD* ruling provided for several exceptions to the general rule where an analysis of the impact of the environment on the project is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions, that is, certain housing projects and transportation priority projects pursuant to PRC Sections 21159.21(f) and (h); 21159.22(a) and (b)(3); 21159.23(a)(2)(A); 21159.24(a)(1) and (3); or 21155.1(a)(4) and (6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC sec. 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC sec. 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing environmental hazards in the General Plan Update and DTSP Areas include but are not limited to seismic hazards, flooding, and hazardous materials. Therefore, though the effects of these hazards on the proposed project are generally not subject to CEQA review following the *CBIA vs. BAAQMD* case, discussion of the project's potential to exacerbate these hazardous conditions is provided in Section 3.7, *Geology and Soils*, and Section 3.10, *Hydrology and Water Quality,* of this DEIR.

# CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

CEQA Guidelines Section 15130(b)(1) states that the information used in the analysis of cumulative impacts should come from one or two sources:

A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or

B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analyses in this EIR use method B and takes into account growth from the proposed project in the respective Citywide and DTSP areas in combination with impacts from projected growth in San Bernardino County.

The cumulative discussions in Sections 3.1 through 3.20 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional emissions of criteria pollutants, and basinwide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, however, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near that area.

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# 3.1 AESTHETICS

This section describes the aesthetics-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project." Summaries of the relevant regulatory framework and existing conditions are followed by a discussion of the project-specific and cumulative impacts. The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refer to the identification of visual resources, the quality of what can be seen, and an overall visual perception of the environment. This analysis attempts to identify and objectively examine factors that contribute to the perception of aesthetic impacts.

## 3.1.1 Regulatory Framework

### STATE

### California Building Code

The California Building Code (CBC), Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code and combines three types of building standards from three different origins:

- Building standards that have been adopted by State agencies without change from building standards contained in the International Building Code.
- Building standards that have been adopted from the International Building Code to meet California conditions.
- Building standards authorized by the California legislature that constitute extensive additions not covered by the International Building Code that have been adopted to address particular California concerns.

The CBC includes standards for outdoor lighting that are intended to improve energy efficiency and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

### California Scenic Highway Program

The intent of the California Scenic Highway Program is "to protect and enhance California's natural scenic beauty and to protect the social and economic values provided by the State's scenic resources." Caltrans administers the program, which was established in 1963 and is governed by the California Streets and Highways Code (§ 260 et seq.). The goal of the program is to preserve and protect scenic highway corridors from changes that would diminish the

aesthetic value of the adjacent land. Caltrans has compiled a list of state highways that are designated as scenic and county highways that are eligible for designation as scenic.

Scenic highway designation can provide several types of benefits to the region. Scenic areas are protected from encroachment of inappropriate land uses, free of billboards, and are generally required to maintain existing contours and preserve important vegetative features. Only low-density development is allowed on steep slopes and along ridgelines on scenic highways, and noise setbacks are required for residential development.

## LOCAL

### City of San Bernardino General Plan

The 2005 General Plan's Circulation and Natural Resources and Conservation Elements include several goals and policies that address aesthetics, scenic resources, and the visual environment of recreational areas and facilities in the City. The 2005 General Plan's Land Use Element also includes design and development goals and policies that aim to convey the visual character of the development of various land uses and streetscapes within the City.

### City of San Bernardino Municipal Code

The City of San Bernardino Municipal Code (SBMC) is the official compilation of local laws, regulations, and ordinances governing the City of San Bernardino. It serves as the legal framework for managing and regulating various aspects of City life. The municipal code covers a broad spectrum of issues, including regulations related to property use, development standards, and land zoning classifications. The municipal code is periodically updated to incorporate new regulations and amendments, reflecting changes in state laws, evolving community needs, and municipal priorities. It is accessible to the public and serves as a resource for residents, businesses, and City officials to ensure compliance with local laws and policies.

#### *Chapter 12.40: Street Trees*

Chapter 12.40, Street Trees, outlines regulations for the management and maintenance of street trees and related vegetation. This chapter aims to ensure the proper care and regulation of street trees and related vegetation to maintain public safety and aesthetics. The chapter includes:

- A requirement for a street tree master plan governing the planting and maintenance of trees in public spaces.
- Regulations for conforming to the master plan and a process for property owners to petition for changes in tree varieties.
- Procedures for the removal of City trees, including criteria for removal and duties of the Director of Public Services.

- Requirements for permits to cut, trim, or remove trees, including the application process and compliance.
- Provisions for covering the cost of tree removal and prohibitions against damaging public trees or vegetation.
- Guidelines on the height of plants near intersections and driveways.
- Responsibilities of property owners to maintain vegetation and address nuisances.

## City of San Bernardino Development Code

The Development Code is Title 19 of the SBMC. It provides comprehensive regulations governing land use and development in the City, establishing the framework for how properties can be used, developed, and modified to ensure alignment with the City's planning goals and community standards. Key components of the Development Code related to aesthetics include:

- **Zoning Regulations:** Defines different zoning districts within the City and specifies permitted uses, building densities, and development standards for each district, including residential, commercial, industrial, and mixed-use zones.
- **Development Standards:** Includes regulations related to building height, lot coverage, setbacks, parking requirements, and open space to ensure that developments meet safety, environmental, and community standards.
  - **Lighting Standards:** Specifications for the type, intensity, and placement of outdoor lighting to ensure it does not create excessive light pollution.
- **Design Review:** Establishes design review procedures for residential, commercial and industrial development proposals to ensure proposed development projects comply with all applicable performance standards and design guidelines. Design Review also ensures that projects adequately meet adopted City performance standards and design guidelines based on the following findings.
  1. The design of the proposed project would provide a desirable environment for its occupants and visiting public as well as its neighbors through good aesthetic use of materials, textures, and colors that will remain appealing and will retain a reasonably adequate level of maintenance.
  2. The design and layout of the proposed project will not unreasonably interfere with the use and enjoyment of neighboring existing or future development, and will not result in vehicular and/or pedestrian hazards.
  3. The architectural design of the proposed project is compatible with the character of the surrounding neighborhood and will maintain the harmonious, orderly and attractive development contemplated by this Development Code and the General Plan.

The proposed project includes an update to the Development Code.

## 3.1.2 Existing Conditions

### CITYWIDE AREA

#### Visual Character

The City of San Bernardino occupies a broad valley framed by the San Bernardino Mountains to the north and the San Gabriel Mountains to the northwest. Aside from its northern edge, which transitions to natural open space and mountain foothills, the City is largely surrounded by developed municipalities: Highland to the east; Redlands and Loma Linda to the south; Colton to the south and southwest; and Rialto to the southwest.

Highly urbanized and visibly built-out, the City's developed footprint is prominent even from distant vantage points. Its primary transportation use is State Route (SR) 215, a major north–south corridor that bisects the City. Interstate (I) 10 cuts across the southern portion, and I-210 runs east–west across the northern part of the developed area. The Santa Ana River and its tributaries—Lytle Creek and Cajon Creek—introduce green corridors through the western and eastern portions of the City (SAWPA 2025).

#### Visual Landmarks

A landmark can be any distinctive visual element—natural, architectural, or cultural—that contributes to City's identity. Landmarks contribute to a City's distinct character and image, and they help orient both residents and visitors. Examples include Glen Helen Regional Park and the San Bernardino National Forest. Both can be seen traveling from SR-215 in the northern portion of the City.

#### Scenic Vistas and Corridors

Scenic vistas offer elevated or unobstructed viewpoints where the public can experience expansive, memorable views of the surrounding environment—both urban and natural.

San Bernardino's northern landscape is defined by scenic features that rise above the valley floor. Badger Hill, near Cal State San Bernardino, reaches 1,850 feet and provides expansive views of the valley, and Arrowhead Springs—home to the historic Arrowhead Springs Hotel—sits between 2,000 and 3,000 feet above the City. Nearby, the Yuhaaviatam of San Manuel Nation, a federally recognized American Indian tribe, occupies elevated terrain between 1,800 and 2,700 feet.

The City itself, at around 1,000 feet elevation, lies mostly on a broad alluvial fan shaped by creeks flowing from the surrounding mountains. Even within this valley, features like the Shandin Hills (1,750 feet) and Perris Hills (1,300 feet) add visual interest and elevation. From nearly any point in the City, residents can enjoy views of the surrounding canyons, hills, and

ridgelines. Notable scenic spots include Badger Hills, Shandin Hills, Kendall Hill, and Perris Hill. Though San Bernardino lacks official scenic corridors, roads like Waterman Avenue, transitioning into Highway 18 as it climbs into the national forest, offer vistas of the City and its natural surroundings.

San Bernardino contains one eligible State Scenic Highway, SR-330, which originates in the City's northeastern corner (see Figure 3.1-1, *Scenic Highway*). This route provides visual access to the mountain landscape.

### Light and Glare

Sources of light and glare in the City include interior and exterior building lighting, security lighting, illuminated signs, and freeway, street and parking lot lighting. Other contributors to nighttime lights and glare are streetlights and vehicular traffic along roadways. The City also experiences ambient light influences from neighboring municipalities, such as Highland to the east, Redlands, Loma Linda, Colton to the south, and Rialto to the southwest. In contrast, to the north of the City are communities with vacant land and natural open spaces, which provide clearer day and nighttime views.

## DOWNTOWN AREA

### Visual Character

The DTSP Area is currently urbanized and developed with a variety of uses, such as public and semipublic uses, parks and plazas, retail, office, service commercial, and residential. The DTSP Area consists of approximately 620 acres in the center of the City. The area is generally bounded to the north by 8th Street, to the west by I-215, to the east by Sierra Way, and to the south by railroad tracks (see Figure 2-7, *Existing Land Uses in the Downtown Specific Plan Land Use Districts*).

Commercial activity in and around Downtown typically follows a suburban strip-retail pattern, organized along arterial streets optimized for automobile access. The DTSP Area incorporates the historic core of the City and nearby neighborhoods and is near San Bernardino's geographic center where several major transportation routes converge, including the Union Pacific Railroad; Atchison, Topeka & Santa Fe Railway; and the historic US Route 66.

### Visual Landmarks

Downtown San Bernardino features two visual landmarks that anchor its urban identity and support its role as a civic and cultural center.

- **Historic San Bernardino City Hall:** Located in the downtown core, this prominent government building serves as an architectural focal point and civic hub.

- **Historic US Post Office:** A classic structure contributing heritage value and visual character, especially at E and D Streets.

### Scenic Vistas and Corridors

There are no designated scenic highways in the DTSP Area.

### Light and Glare

Existing downtown light sources include illuminated building facades, automobile headlights, and street lighting. Views of the mountains in the north are often obstructed by buildings, mature trees, and streetlight infrastructure, making these vistas limited and intermittent.

## 3.1.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

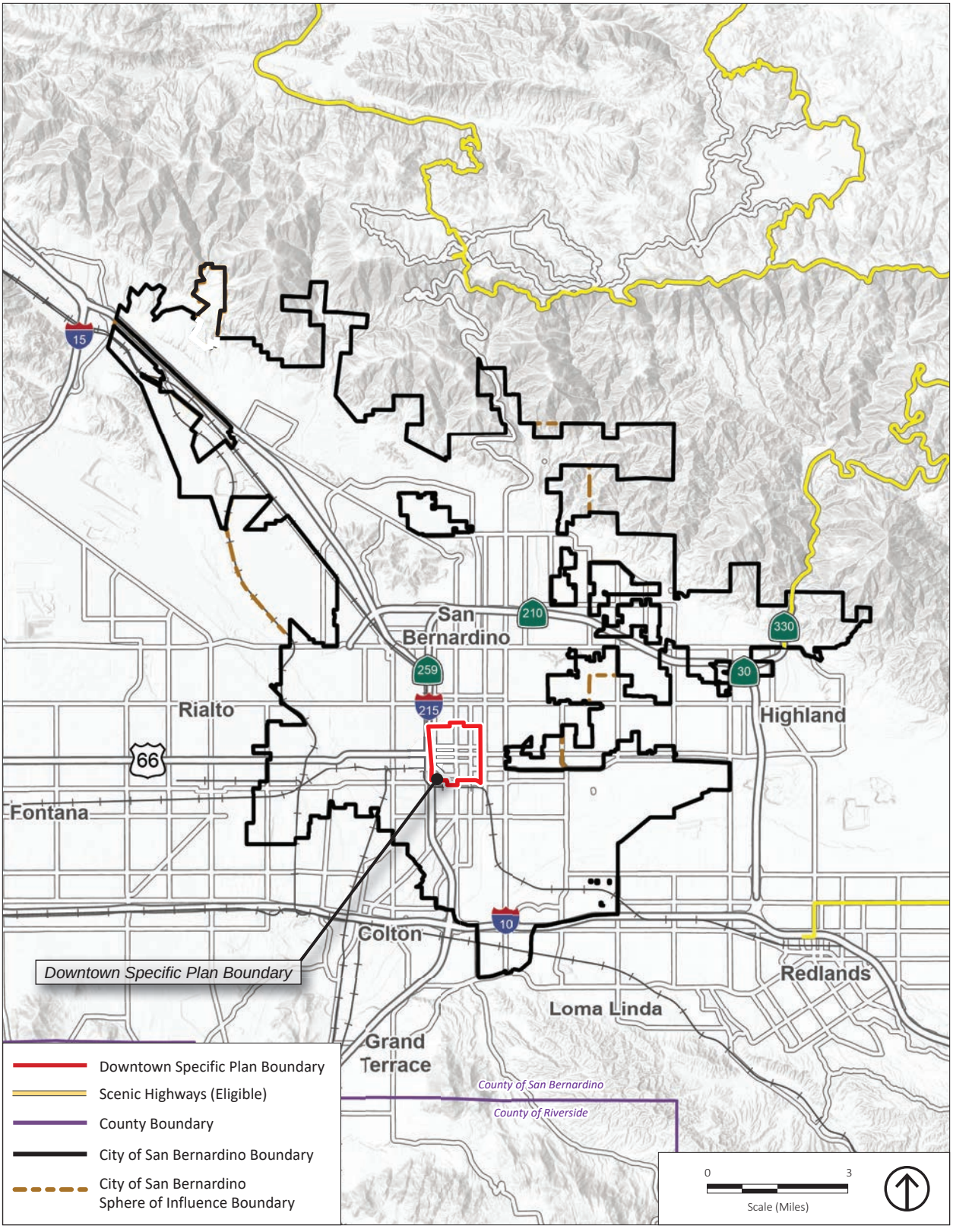
State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning aesthetic resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the proposed project would have a significant effect concerning aesthetic resources if it would:

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

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




Source: Generated using ArcMap 2025; Caltrans 2016.

Figure 3.1-1
**Scenic Highways**

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### THRESHOLD GUIDANCE

Under Public Resources Code (PRC) § 21071, an unincorporated area is defined as an "urbanized area" if it meets two key criteria:

1. It is either completely surrounded by incorporated cities whose combined population with the unincorporated area is at least 100,000 and the unincorporated area's population density is equal to or greater than those cities, or it is located within an urban growth boundary with a residential density of at least 5,000 persons per square mile; and
2. The county board of supervisors has found that the area's general plan, zoning, and related policies encourage compact development that promotes efficient transportation, economic growth, affordable housing, energy efficiency, a balanced jobs-housing relationship, and protects the environment, open space, and agriculture, with the draft findings submitted to the Office of Planning and Research for review prior to finalization.

### METHODOLOGY

The evaluation of aesthetics and aesthetic impacts is highly subjective, yet it must objectively identify the visual features of the existing environment and their importance. The characterization of aesthetics involves establishing existing visual character, including resources and scenic vistas unique to the City. Visual resources are determined by identifying existing landforms (e.g., topography and grading), views (e.g., scenic resources such as natural features or urban characteristics), viewing points/locations, and existing light and glare (e.g., nighttime illumination). Changes to the existing aesthetic environment that would result from implementation of the proposed project are identified and qualitatively evaluated based on the proposed modifications to the existing setting and the viewer's sensitivity. This analysis focuses on the proposed project's potential to conflict with applicable zoning and other regulations governing scenic quality and create a new source of substantial light and glare in the City.

## 3.1.4 Project Impact Analysis

**a) Would the project have a substantial adverse effect on a scenic vista?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

From the valley floor, the canyons, hills, and ridgelines that frame San Bernardino, these features are clearly visible to residents. Prominent hills offering vistas include Badger Hills, Shandin Hills, Kendall Hill, and Perris Hill. Though the City does not have designated scenic corridors, several roads offer vistas of the City. Most notably when Waterman Avenue turns into Highway 18 as it enters the national forest.

The General Plan and Development Code Update would result in changes to land use designations and associated development standards that could affect views of surrounding areas. However, the General Plan Update also includes a set of policies, listed in Table 3.1-1, *Scenic Vistas: Proposed General Plan Update Policies*, specifically intended to preserve scenic vistas and visual resources.

**Table 3.1-1 Scenic Vistas: Proposed General Plan Update Policies**

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-1.1 | **Natural terrain.** Preserve the integrity of natural features of the city, including its hillsides, canyons, and ridgelines that serve to provide viable habitat for the biological resources that inhabit them. |
| OSC-1.2* | **Hillside management.** Regulate proposed projects in the City's hillside areas (areas of 15% or greater slope) to ensure the protection of the hillside's natural features, aesthetic qualities, and environmental concerns. |
| OSC-1.3* | **Ridgelines.** Protect ridgelines from development or other land uses that diminish their scenic value, ensure the proper conservation, preservation, and practically manage ridgelines. |
| OSC-1.4 | **Waterways.** Preserve the integrity of the City's streams, rivers, playas, washes, channels, water bodies, and other waterways and riparian areas to the greatest extent possible for their intrinsic and habitat value. |
| OSC-1.5* | **Project review.** Review grading, access, and site plans for development projects to ensure they are designed to minimize impacts to the City's topography, playas, washes, and vistas to the greatest extent possible |
| OSC-1.6* | **Design review.** Carefully review proposals for new, substantially renovated, or expanded projects on or adjacent to properties that:<br>▪ Contain sloping topography (areas of 15% natural or greater) that would be impacted or natural vistas.<br>▪ Are located within 100 feet from the Santa Ana River, Cajon/Lytle Creek, or other waterway.<br>▪ Contain landmark features (visually significant rock outcroppings, native plants, washes, etc.).<br>▪ Have local, state, federal, or tribal historical, archeological, or cultural significance. |
| **Land Use and Urban Form Element** | |
| LU-3.1 | **Architectural and visual interest.** Encourage architecture and elements that add visual interest to buildings, structures, and public improvements that reduce monotony, and enhance perceptions of San Bernardino as a distinctive place. |
| LU-3.6 | **Location-specific design guidelines.** Develop location-specific design guidelines that reinforce the character of a district or neighborhood, such as the downtown, Santa Fe Depot area, Mount Vernon neighborhood, or other areas that merit location-specific design guidance. |

**Table 3.1-1 Scenic Vistas: Proposed General Plan Update Policies**

| | |
|---|---|
| LU-5.1 | **Development review and entitlement.** Ensure existing and proposed land uses standards and regulations in the Municipal Code, including building codes, development standards, and nuisance codes are adhered to through development review entitlement process. |
| LU-5.2 | **Land use transitions.** To the extent feasible, new development along major thoroughfares and at the edges of commercial centers adjoining low-scale neighborhoods to scaled to provide transitions in building height and bulk, consistent with their character. |
| LU-7.1 | **Conform development with natural setting.** Locate and design development within the City's hillsides and open spaces to preserve natural features, habitat, and wildlife corridors and to retain the character and aesthetic value of the natural landform. |
| LU-7.3 | **Conform with natural setting.** Design roadways to preserve the natural topography and minimize their impact on environmentally sensitive areas by:<br>▪ Designing alignments to pass around rather than through sensitive areas.<br>▪ Minimizing cuts, fills, and grading to preserve the landscape and prevent erosion.<br>▪ Permitting flexibility in grading standards in roadway design, when applicable. |
| LU-9.6 | **Housing compatibility.** Require new projects to be well integrated into neighborhoods, with smooth transitions in scale, form, density, and character, especially in transitional areas between single- and multi-family housing consistent with City objective design standards. |
| LU-22.6 | **Verdemont gateways.** The following guidelines shall apply to Gateway designs:<br>▪ Unique, eye-catching features such as arches, towers, fountains, and significant landscaping.<br>▪ Ornate features such as textured pavement, public art, and fountains, which are constructed of durable and, when possible, and natural materials.<br>▪ Themed signage and lighting that announces arrival into a particular area or project.<br>▪ Clear directional signage. |

* Denotes mitigating policies

These policies address hillside preservation, ridgeline protection, visual integration of new development, and design review standards near waterways, natural features, and culturally significant areas. Several land use policies also emphasize the importance of site-appropriate design, neighborhood character, and scenic compatibility, particularly in hillside and gateway areas.

The Development Code Update implements the General Plan by establishing specific development standards, zoning regulations, and design requirements that influence building placement, height, massing, grading, and site layout. While these standards are intended to reduce visual impacts, the Development Code cannot fully control the cumulative visual effects of future development across the General Plan Update Area. For example, large-scale or

multiple developments could incrementally alter the character of the landscape despite adherence to design standards. Therefore, there remains a potential for substantial adverse changes to scenic vistas, including obstruction of views, alteration of the visual character of hillsides or ridgelines, and diminished aesthetic quality along major roads and vantage points. Therefore, this impact is determined to be **potentially significant.**

**Impact AES-1a: Implementation of the General Plan Update would have significant and avoidable impacts on scenic vistas.**

**Mitigation Measures:** At this programmatic level, there are no feasible mitigation measures capable of fully eliminating these impacts. While the Development Code Update standards and General Plan Update policies may reduce impacts in some cases, they cannot fully prevent substantial adverse effects to scenic vistas across the General Plan Update Area.

**Significance without Mitigation:** Significant and Unavoidable. Buildout of the General Plan Update would result in development that affects scenic vistas. No mitigation measures are feasible to reduce impacts across all potential development, therefore impacts would remain **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area consists of nine zone districts that will be combined into the DTSP. The intent of the plan aims to enhance the aspects that give each district its unique character while improving the attractiveness and livability of the Downtown area. The expected form and character for each district are described in Chapter 2, *Project Description*. Scenic vistas such as canyons, hills, and ridgelines are visible to residents intermittently throughout the City, including the DTSP Area. Table 2-7, *District Standards*, in Chapter 2 shows the development standards for each district in the DTSP Area. The Downtown Core (no limit) and County Center (120 feet) would allow height limits that are higher than those established in the DTSP.

The DTSP would adhere to the proposed General Plan Update policies, listed in Table 3.1-1 which provide a regulatory framework to ensure that future development respects the City's scenic qualities. Design review requirements, slope protections, and location-specific design guidelines would continue to guide development in a manner that avoids obstructing or degrading important views.

However, Table 04.02, Residential Development Standards, in the existing Development Code establishes a maximum structure height of 100 feet in the Commercial Regional-Downtown (CR-2) zoning district. Under the DTSP, the County Center would allow heights up to 120 feet, and the Downtown Core would have no maximum building height. These changes represent an increase over existing height limits and could result in new structures that obstruct or significantly alter scenic vistas from surrounding areas. Therefore, the DTSP would create a substantial adverse impact on scenic vistas. This impact is **potentially significant**.

**Impact AES-1b: Implementation of the Downtown Specific Plan would have significant and avoidable impacts on scenic vistas.**

**Mitigation Measures:** No mitigation measures that could fully prevent or offset impacts to scenic resources across the DTSP area are available.

**Significance without Mitigation:** Significant and Unavoidable. The DTSP's development standards would permit taller structures in the Downtown Core and County Center Land Use Districts when compared the applicable standards for these areas under the existing Development Code. Structures at these proposed permitted heights would have the potential to partially or fully block or degrade scenic vistas. Because DTSP's standards for the height and scale of development in the DTSP Area are fundamental components to implementing the proposed vision of the plan, no mitigation measures are available to reduce these impacts. Therefore, impacts to scenic vistas are **significant and unavoidable.**

### b) Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

There are no officially designated scenic highways in the City. As shown in Figure 3.1-1, the City only contains one eligible State Scenic Highway, SR-330, which originates in the City's northeastern corner (Caltrans 2025). Although eligibility does not confer scenic designation, it reflects the route's potential scenic value and raises the importance of visual and environmental impacts in adjacent land use planning.

The General Plan Update proposes changes to land use designations of the area surrounding SR-330. The updated designations include Residential Medium (RM), Rural/Estate Neighborhood (RR), Mixed-Use Center (MU-CTR), Traditional Neighborhood (NT), Flood Control (FC), Single Family/Large Lot (RE), and Open Space (OS).

The existing General Plan designates this area as Residential Estate (RE), Residential Low (RL), Residential Medium (RM), Residential Urban (RU), Commercial General-1 (CG-1), Public Open Space, and Publicly Owned Flood Control (PFC). Though the updated plan introduces new designations such as MU-CTR and NT, these areas have historically allowed both commercial and residential uses.

These land use changes would not impede the scenic views available from SR-330. The revised designations are generally consistent with existing development intensity and do not propose significant increases in allowable building height or density that could obstruct views of natural landscapes or open space from the highway corridor. Additionally, a portion of the area

adjacent to SR-330 remains designated as Open Space or Flood Control, which further preserves the visual quality of the corridor.

Only changes needed to explain existing standards are proposed in Chapter 19.20, Property Development Standards, of the existing Development Code as part of the update, meaning that applicable development standards will remain in place, such as setbacks, and design requirements. As a result, the potential for adverse impacts to scenic quality or visual character along SR-330 is minimal.

In addition, the General Plan Update includes policies designed to ensure that future development does not substantially degrade views of scenic highways, trees, rock outcroppings, or historic buildings, particularly through the implementation of Policy OSC-1.6. These policies are detailed in Table 3.1-2, *Scenic Highways: Proposed General Plan Update Policies*. Furthermore, Chapter 12.40, Street Trees, of the SBMC, establishes regulations for the management and maintenance of street trees and related vegetation. As a result, this impact is considered **less than significant**.

**Table 3.1-2 Scenic Highways: Proposed General Plan Update Policies**

| **Open Space and Conservation Element** | |
|---|---|
| OSC-1.6 | **Design review**. Carefully review proposals for new, substantially renovated, or expanded projects on or adjacent to properties that:<br>▪ Contain sloping topography (areas of 15% natural or greater) that would be impacted or natural vistas.<br>▪ Are located within 100 feet from the Santa Ana River, Cajon/Lytle Creek, or other waterway.<br>▪ Contain landmark features (visually significant rock outcroppings, native plants, washes, etc.).<br>▪ Have local, state, federal, or tribal historical, archeological, or cultural significance. |

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

There are no designated scenic highways in the City, including the DTSP Area. The City only contains one eligible State Scenic Highway, SR-330, which originates in the City's northeastern corner and is approximately five miles north of the DTSP Area (Caltrans 2025). As such, SR-330 cannot be seen from the DTSP Area. The DTSP would also follow policies from the General Plan Update listed in Table 3.1-2. Therefore, implementation of the DTSP would be **less than significant.**

**Significance without Mitigation:** Less than significant.

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

The City of San Bernardino has a population of 267,267 persons (see Appendix B). It is surrounded by incorporated cities, except to the north (see Figure 2-1, *Citywide Project Area*) and would meet the population density threshold or planning policy requirements defined under PRC Section 21071. Additionally, the City of San Bernardino does have its own general plan and zoning ordinances. The city and the DTSP area are considered an urbanized area. The analysis below identifies the proposed project's potential to conflict with applicable zoning and other regulations governing scenic quality.

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Implementation of the General Plan Update would result in the development of vacant parcels and intensification of land uses in areas that are already developed. This growth would alter the visual appearance of some sites, but within the context of an already urbanized landscape, and largely within the existing development standards of the City. As shown on Figure 2-5, *General Plan Update Land Use Plan*, the more intensive development would be concentrated in designated focus areas (refer to Figure 2-6, *General Plan Update Strategy Areas,* in Chapter 2, *Project Description*), which would change the character of these areas.

Future projects would be subject to the standards in the Development Code Update. These standards are intended to ensure that new development is compatible with existing land uses and maintains the City's visual character. For example, the Development Code Update and would continue to help reduce visual impacts. Although the Development Code is being updated as part of the overall project, most of the changes are explanatory or designed to simplify implementation. Most of the existing development provisions will be carried forward to the Development Code Update. The Development Code Update is intended to implement the land use changes and policies established by the General Plan Update.

The General Plan Update includes specific scenic quality policies designed to enhance the City's identity, promote high-quality urban design, and protect visual character. These are listed in Table 3.1-3, *Scenic Quality: Proposed General Plan Update Policies*, and include policies that support cohesive neighborhoods, urban design enhancements, and integration of cultural and historic elements. Together, these General Plan Update policies and the assumed continuation of relevant Development Code provisions would ensure that future development maintains or improves the visual character of the City. Therefore, the impact on visual character and scenic quality would be **less than significant.**

### Table 3.1-3 Scenic Quality: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-1.1 | **Distinct places.** Maintain and facilitate the development of districts, neighborhoods, open spaces, and other places that are linked but differentiated by use, form, density, and character. |
| LU-1.2 | **Complete neighborhoods.** Maintain, strengthen, and create complete neighborhoods with parks, schools, and community facilities and a mix of housing types, and ensure their connection to neighborhood-serving businesses, trails, and transit. |
| LU-1.3 | **Development concentrated in nodes along corridors.** As a means to revitalize corridors, consolidate land uses along commercial corridors by creating major and minor nodes that concentrate commercial and residential uses. |
| LU-1.4 | **Neighborhood centers.** Establish neighborhood-serving centers that provide uses meeting the daily needs of residents such as grocery stores, local-serving restaurants, and service businesses and are located within safe walking distance of residents. |
| LU-1.5 | **Transit-oriented places.** Facilitate development of residential, commercial, and office uses near rail and bus rapid transit stations, differentiated from surrounding areas by higher densities/intensities, options for station access, development standards, and gathering spaces. |
| LU-1.6 | **District placemaking.** Create distinct pedestrian-active districts (e.g., Downtown, Santa Fe Depot, Entertainment District, and Mount Vernon) by distinguishing land uses, orienting buildings around plazas and open spaces, and incorporating street landscaping and amenities. |

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Future development under the DTSP is expected to primarily entail infill and intensification on parcels that are currently vacant, already developed, or developed but underutilized. Though implementation of the DTSP would change the visual character of certain sites, these changes would occur in a manner consistent within an existing urban context.

Development would be guided by the DTSP's design standards and land use policies, which are intended to ensure consistency with the existing urban form and character of the area. Though visual changes may occur, these changes would not substantially degrade public views or scenic quality within the DTSP Area. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**d) Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates outside the intended area. Glare is light that shines directly or is reflected from a surface into a viewer's eyes. Spill light and glare impacts are effects of a project's exterior lighting on adjoining uses and areas.

Sources of light in the City include building lighting (interior and exterior), security lighting, sign illumination, and parking area lighting. These sources of light and glare are mostly associated with residential, commercial, and industrial uses. Other sources of nighttime light and glare include streetlights, vehicular traffic along surrounding roadways, and ambient lighting from surrounding communities.

Future development in accordance with the General Plan Update would occur in areas designated for development and would allow for development of currently undeveloped parcels and intensification and redevelopment of existing land uses, which could increase nighttime light and glare in San Bernardino. For instance, the conversion of underutilized or vacant areas into residential or commercial uses would introduce new sources of light; however, the General Plan Update would maintain land use designations in most of the City.

Development and redevelopment projects in the City would be required to comply with the design guidelines for residential and commercial uses outlined in Title 19 of the SBMC. Chapter 19.20, Property Development Standards, includes specific requirements to reduce glare and limit light pollution. It states that no glare incidental to any use shall be visible beyond the boundaries of the parcel, and that exterior lighting must be energy-efficient, shielded or recessed, and directed downward and away from adjacent properties and public rights-of-way. Lighting must not blink, flash, or be of unusually high intensity or brightness, and fixtures must be appropriate in scale, intensity, and height for their use. Security lighting is also required at all building entrances and exits.

In addition, the General Plan Update includes policies that address lighting and glare to further minimize potential impacts (see Table 3.1-4, *Light and Glare: Proposed General Plan Update Policies*). These policies aim to manage ambient illumination and protect sensitive uses and natural systems.

With implementation of these standards and policies, the General Plan Update would not adversely affect day or nighttime views and would not contribute to night sky pollution. Impacts would be **less than significant.**

**Table 3.1-4 Light and Glare: Proposed General Plan Update Policies**

| Land Use and Urban Form Element | |
|---|---|
| LU-9.6 | **Housing compatibility.** Require new projects to be well integrated into neighborhoods, with smooth transitions in scale, form, density, and character, especially in transitional areas between single- and multi-family housing consistent with City objective design standards. |

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

Development within the DTSP Area would primarily consist of infill and redevelopment on underutilized or vacant parcels. These projects could introduce new sources of lighting such as building-mounted lights, signage illumination, and parking lot lighting. However, the DTSP Area is already developed with urban uses and includes existing sources of nighttime lighting from streetlights, vehicular traffic, building lighting, and surrounding commercial and residential areas. Future development would not introduce lighting that is substantially different in character or intensity from existing conditions.

The DTSP contains a goal stating that building design shall incorporate materials and finishes that minimize heat and glare. Additionally, future development within the DTSP Area would be subject to the City's Municipal Code requirements for lighting and glare, including the provisions in Chapter 19.20, Property Development Standards, which require all exterior lighting to be shielded or recessed to contain light within the parcel, minimize glare, and direct light downward and away from adjacent properties and public rights-of-way. Lighting must also be appropriate in scale and intensity, and high-intensity or blinking lights are prohibited. In addition, the DTSP includes design standards for lighting in the DTSP Area depending on use such as storefront glass shall be clear without reflective coating or dark tinting. Lightly tinted glazing less than 15 percent, low emissivity, solar, is acceptable.

These requirements would ensure that future lighting does not result in substantial spill light or glare affecting off-site areas. Further, the consistency of proposed development with existing urban land uses in the DTSP Area reduces the likelihood of lighting adversely affecting nighttime views or contributing to skyglow. Therefore, this impact is **less than significant.**

**Significance without Mitigation:** Less than significant.

## 3.1.5 Cumulative Impact Analysis

The cumulative setting for visual and aesthetic impacts includes the City of San Bernardino and surrounding areas where future development may occur under the General Plan

Update/Development Code Update, the DTSP, and other related or foreseeable development projects in the region. Given that aesthetic impacts, such as visual character, scenic vistas, and light and glare, are typically localized, the cumulative analysis focuses on areas where such impacts may overlap or reinforce one another visually or perceptually. Collectively, these projects may alter the visual environment within the City, particularly in locations where intensification or new development is proposed.

**Would the project have a cumulative effect related to aesthetics?**

## Scenic Vistas

The proposed General Plan Update includes policies to preserve hillside views, ridgelines, waterways, and natural landforms visible from public viewpoints. These policies apply citywide and are reinforced by the existing and updated Development Code, which includes design standards and slope protection requirements. Implementation of the DTSP could introduce taller buildings within the Downtown Core and County Center districts and new buildings developed throughout the General Plan Update Area could disrupt scenic vistas at public viewpoints. DTSP development may partially block some views from limited vantage points, but such changes are consistent with the plan's intent to intensify and revitalize the urban core. Cumulative projects in the City and surrounding area could block or significantly degrade scenic vistas resulting in significant **cumulatively considerable impacts**.

**Impact AES-2: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative with respect to scenic vistas.**

**Mitigation Measures:** No mitigation measures are feasible.

**Significance without Mitigation:** Significant and unavoidable. Development throughout the City and surrounding areas has the potential to obstruct scenic vistas from public viewing points. No feasible mitigation measures exist that could fully prevent or offset the degradation of these scenic resources due to the height and scale of potential development. Therefore, impacts to scenic vistas are **significant and unavoidable and cumulatively considerable**.

## Scenic Highways

The only eligible scenic highway within the City is SR-330, which originates in the northeast corner of San Bernardino and is approximately five miles from the DTSP Area. Cumulative development near SR 330 would remain subject to General Plan Update policies and Development Code Update standards that restrict development intensity and ensure design compatibility with scenic resources. Impacts would be **less than significant** and would not be cumulatively considerable.

### Visual Character or Scenic Quality

The City is an urbanized area, and cumulative growth would primarily occur through infill and redevelopment. Although individual projects may change the appearance of specific sites, the General Plan Update/Development Code Update and DTSP include policies and design standards to ensure compatibility with existing visual character and to enhance neighborhood identity, public space, and architectural quality. Cumulative development under both planning efforts would reinforce the City's design goals and help avoid visual degradation. Impacts would be less than cumulatively considerable and **less than significant.**

### Light and Glare

Future development would be required to comply with Chapter 19.20 of the Development Code Update, which includes specific limits on intensity, shielding, and orientation. Existing development already contributes to ambient lighting in the City, and the DTSP Area is currently urbanized, so new development would not introduce a significant new source of light or glare compared to baseline conditions. Cumulative lighting would remain consistent with applicable regulations and would not collectively degrade nighttime views or contribute significantly to skyglow. Impacts would be less than cumulatively considerable and **less than significant.**

## 3.1.6 References

Caltrans (California Department of Transportation). 2025. California State Scenic Highway System Map. California Department of Transportation. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

DOF (California Department of Finance). 2025. Population and Housing Estimates for Cities, Counties, and the State: January 1, 2024, and 2025. https://dof.ca.gov/forecasting/demographics/estimates-e1/.

SAWPA (Santa Ana Watershed Project Authority). 2025, August 12 (accessed). Santa Ana River Watershed Location Map. https://yoursocaltapwater.org/wp-content/uploads/2012/05/santa-ana-watershed-map4.jpg.

# 3.2 AGRICULTURE AND FORESTRY RESOURCES

This section describes the potential impacts to agricultural and forestry resources associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project." This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential impacts to agricultural and forestry resources, and identifies proposed General Plan Update policies, as well as feasible mitigation measures, that would minimize any potentially significant impacts.

## 3.2.1 Regulatory Framework

### STATE

### Farmland Mapping and Monitoring Program

Within the California Natural Resources Agency, the State Department of Conservation provides technical services and information to promote informed land use decisions and sound management of the state's natural resources. As part of this duty, the Department of Conservation manages the Farmland Mapping and Monitoring Program (FMMP), which supports agriculture throughout California by developing maps and statistical data for analyzing land use impacts to farmland. The FMMP publishes a field report for each county about every two years. The FMMP categorizes land by agricultural production potential according to the following classifications:

- **Prime Farmland** has the best combination of physical and chemical features able to sustain long-term agricultural production. Prime farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance** is similar to Prime Farmland, but with minor shortcomings, such as steeper slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland** consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been farmed at some time during the four years prior to the mapping date.
- **Farmland of Local Importance** consists of all farmable land not meeting the definitions of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. This includes

land that is or has been used for irrigated pasture, dryland farming, confined livestock or dairy facilities, aquaculture, poultry facilities, and dry grazing. It also includes soils previously designated by soil characteristics as prime farmland, farmland of statewide importance, and unique farmland that has since become idle.

- **Grazing Land** is the land on which the existing vegetation is suited to the grazing of livestock.
- **Confined Animal Agriculture** lands include poultry facilities, feedlots, dairy facilities, and fish farms. In some counties, confined animal agriculture is a component of the farmland of local importance category.
- **Nonagricultural and Natural Vegetation** includes heavily wooded, rocky, or barren areas; riparian and wetland areas; grassland areas that do not qualify for grazing land due to their size or land management restrictions; small water bodies; and recreational water ski lakes. Constructed wetlands are also included in this category.
- **Semi-agricultural and Rural Commercial Land** includes farmstead, agricultural storage and packing sheds, unpaved parking areas, composting facilities, equine facilities, firewood lots, and campgrounds.
- **Vacant or Disturbed Land** includes open field areas that do not qualify for an agricultural category, mineral and oil extraction areas, off-road vehicle areas, electrical substations, channelized canals, and rural freeway interchanges.
- **Rural Residential Land** includes residential areas of one to five structures per 10 acres.
- **Urban and Built-up Land** is occupied by structures with a building density of at least one unit per 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential structures, industrial structures, commercial structures, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment structures, and water control structures.
- **Water** is used to describe perennial water bodies with an extent of at least 40 acres.

## California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, better known as the Williamson Act, conserves agricultural and open space lands through property tax incentives and voluntary restrictive land use contracts administered by local governments under State regulations. Private landowners voluntarily restrict their land to agricultural and compatible open space uses under minimum 10-year rolling term contracts, with counties and cities also acting voluntarily. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value.

## Forestland and Timberland Protection

State regulations such as the Forest Taxation Reform Act of 1976 and the Z'berg-Nejedly Forest Practice Act of 1973 (California Forest Practice Act) provide for the preservation of forest lands from encroachment by other, incompatible land uses and for oversight of the management of forest practices and forest resources.

Public Resources Code Section 12220(g) defines "forest land" for the purposes of CEQA as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water-quality, recreation, and other public benefits.

The California Timberland Productivity Act of 1982, like the Williamson Act, was passed to encourage the production of timber resources. Government Code Section 51104(g) defines "timber," "timberland," and "timberland production zone" for the purposes of CEQA and "Timberland Preserve Zone," which may be used in city and county general plans, as follows:

- **"Timber"** means trees of any species maintained for eventual harvest for forest production purposes, whether planted or of natural growth, standing or down, on privately or publicly owned land, including Christmas trees, but does not mean nursery stock.
- **"Timberland"** means privately owned land, or land acquired for State forest purposes, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre.
- **"Timberland Production Zone"** or **"TPZ"** means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."

County boards of supervisors may designate areas of timberland preserve (i.e., timberland production zones) that restrict the land's use to the production of timber for an initial 10-year term in return for lower property taxes.

# REGIONAL

## San Bernardino LAFCO

The San Bernardino Local Agency Formation Commission (LAFCO) is an independent agency created by the State to promote the wise use of land resources while providing for the present and future needs of a community. As part of this charge, San Bernardino LAFCO establishes

agricultural policies and provides guidance to property owners with LAFCO applications who propose the conversion of prime agricultural lands, as outlined in the LAFCO for San Bernardino County Policy and Procedure Manual (San Bernardino LAFCO 2024).

### San Bernardino National Forest National Forest Planning

The San Bernardino National Forest (SBNF) borders the General Plan Update Area at its northeastern boundary. Long-range goals and objectives for management of the SBNF are in the San Bernardino National Forest Land and Resource Management Plan, adopted in 1988, and last updated in 2005 as part of the Land Management Plan for the Pacific Southwest Region.

The forest plan establishes the management and associated long-range goals and objectives for the SBNF; specifies standards, guidelines, approximate timing, and vicinity of the practices necessary to achieve that direction; and establishes monitoring and evaluation requirements and standards needed to ensure that the direction is carried out and to determine how well outputs and effects were predicted (USFS 2005).

## LOCAL

### San Bernardino Development Code

Chapter 19.28, Landscaping Standards, of the existing Development Code contains Section 19.28.100, Removal or Destruction of Trees, which states the City's policy for tree removal. According to Section 19.28.100, a permit is required for the removal or destruction of more than five trees within a 36-month period. In these cases, an arborist report and tree replacement plan is required, and in lieu of a plan, all trees determined to be of significant value to the City must be replaced with a 36-inch-box specimen tree.

### San Bernardino Urban Forestry Management Plan

The City's Urban Forestry Management Plan was prepared by the operations manager of San Bernardino's Public Works Department and the City's forestry supervisor. The goals of the plan are to:

- Improve the urban forest by properly nurturing all City trees through regular maintenance and care.
- Initiate a cyclical pruning program.
- Foster community involvement in the care and nurturing of City trees.
- Diversify tree species through a robust tree planting plan.
- Inventory and assess the condition of all City trees and maintain an up-to-date database for faster response to citizen inquiries.

- Remove dying/diseased trees and replace with the "right tree at the right spot" to accelerate young-tree growth opportunities.
- Establish San Bernardino as a Tree City USA.

The plan includes a description of the tree inventory in the city, authorized tree species, and rules for tree maintenance. In addition, it provides standards for the installation of street trees by developers and residents, along with requirements for tree permits and other installation details. Finally, the plan provides guidance on general maintenance responsibilities.

## 3.2.2 Existing Conditions

### REGIONAL

Agricultural commodities in San Bernardino County grossed approximately $381 million in 2023, a 7 percent decrease from 2022. Milk and milk products, livestock, and eggs are the most profitable products in the county, accounting for a combined 65 percent of the total value from agricultural products in 2023 (San Bernardino County 2023). While agriculture remains a critical component of San Bernardino County's economy, the county's decreasing agricultural yields are primarily due to conversion of farmland. As indicated in Table 3.2-1, *San Bernardino County Agricultural Land Conversion, 1984 to 2020*, the acreages for Prime Farmland and Farmland of Local Importance have decreased by 11 and 29 percent, respectively.

**Table 3.2-1 San Bernardino County Agricultural Land Conversion, 1984 to 2020**

| Land Use Category | 1984 Acreage | 2020 Acreage | 1984 to 2020 Net Acreage Changed | Percentage Change |
|---|---|---|---|---|
| Prime Farmland | 43,184 | 9,805 | 33,379 | -77% |
| Farmland of Statewide Importance | 12,770 | 5,304 | 7,466 | -58% |
| Unique Farmland | 6,297 | 2,575 | 3,722 | -59% |
| Farmland of Local Importance | 7,324 | 410 | 6,914 | -94% |
| Grazing Land | 963,608 | 896,437 | 67,171 | -7% |

Source: DOC 2025.

### CITYWIDE AREA

#### Important Farmland

While the majority of land within the city limit is urban and built-up land, land use for agricultural purposes is in the General Plan Update Area. The General Plan Update Area includes

46 acres of California Important Farmland, including Prime Farmland, Farmland of Statewide Importance, and Farmland of Local Importance, as classified by the Department of Conservation and shown on Figure 3.2-1, *Important Farmlands*. Table 3.2-2, *Important Farmland by Acreage in the General Plan Update*, lists the number of acres associated with each farmland classification. Most agricultural land in the General Plan Update Area is grazing land, which accounts for 6,371 acres.

**Table 3.2-2 Important Farmland by Acreage in the General Plan Update**

| Land Use Category | Within City Limits | SOI | Total |
|---|---|---|---|
| Prime Farmland | 2 | 0 | 2 |
| Farmland of Statewide Importance | 10 | 1 | 11 |
| Unique Farmland | 0 | 0 | 0 |
| Farmland of Local Importance | 33 | 0 | 33 |
| **Important Farmland TOTAL** | **45** | **1** | **46** |
| Grazing Land | 5,610 | 761 | 6,371 |

Source: DOC 2025a.

## Williamson Act Contracts

A Williamson Act contract is an agreement between the property owner and the county that provides the property owner with reduced property taxes in exchange for maintaining the land in commercial agricultural use for a period of 10 years. The contract is binding on all subsequent property owners. There are no active Williamson Act contracts within the city limits or SOI (DOC 2025b). Additionally, the City's 2005 General Plan and existing Zoning Map do not designate or zone any land for agricultural uses within the city or SOI.




Source: Department of Conservation 2020.

Figure 3.2-1
**Important Farmlands**

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### Forestry Resources

There are no portions of the General Plan Update Area that are designated or zoned as forest/timberland use. However, portions of the General Plan Update Area abutting the San Bernardino National Forest in the eastern part of the city and SOI contain forest and woodland that meet the definition of forest land under PRC Section 12220(g). As described in Appendix D, *Biological Resources Technical Repor*t, the General Plan Update Area contains 309 acres of forest and woodlands. This land cover is defined as land containing multilayered vegetation with at least 20 percent tree cover. Forest and woodland in the General Plan Update Area are shown in Figures 3.2-2a through 3.2-2c, *Forest and Woodland in the General Plan Update Area*.

As shown in Figures 3.2-2a through 3.2-2c, the forest and woodland in the General Plan Update Area consists of open space areas of less than an acre to 16 acres at the periphery of the city and SOI. While some of this land is contiguous with protected or managed forest/woodland in the San Bernardino National Forest, other portions are surrounded by existing or future urban development that would limit its viability as managed forest land. None of the identified forest/woodlands in the General Plan Update Area, with the exception of those in the San Bernardino National Forest, are actively managed for forestry purposes.

### DOWNTOWN AREA

The DTSP Area is developed with urban uses. No important farmland is mapped in the DTSP Area, nor does it contain any forest/woodland land cover or land under Williamson Act Contracts.

## 3.2.3 Standards for Analysis

Appendix G, **Environmental Checklist Form**, of the California Environmental Quality Act (CEQA) Guidelines states that,

> 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.

The proposed project would result in a significant impact to agricultural and forestry resources if it would:

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

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

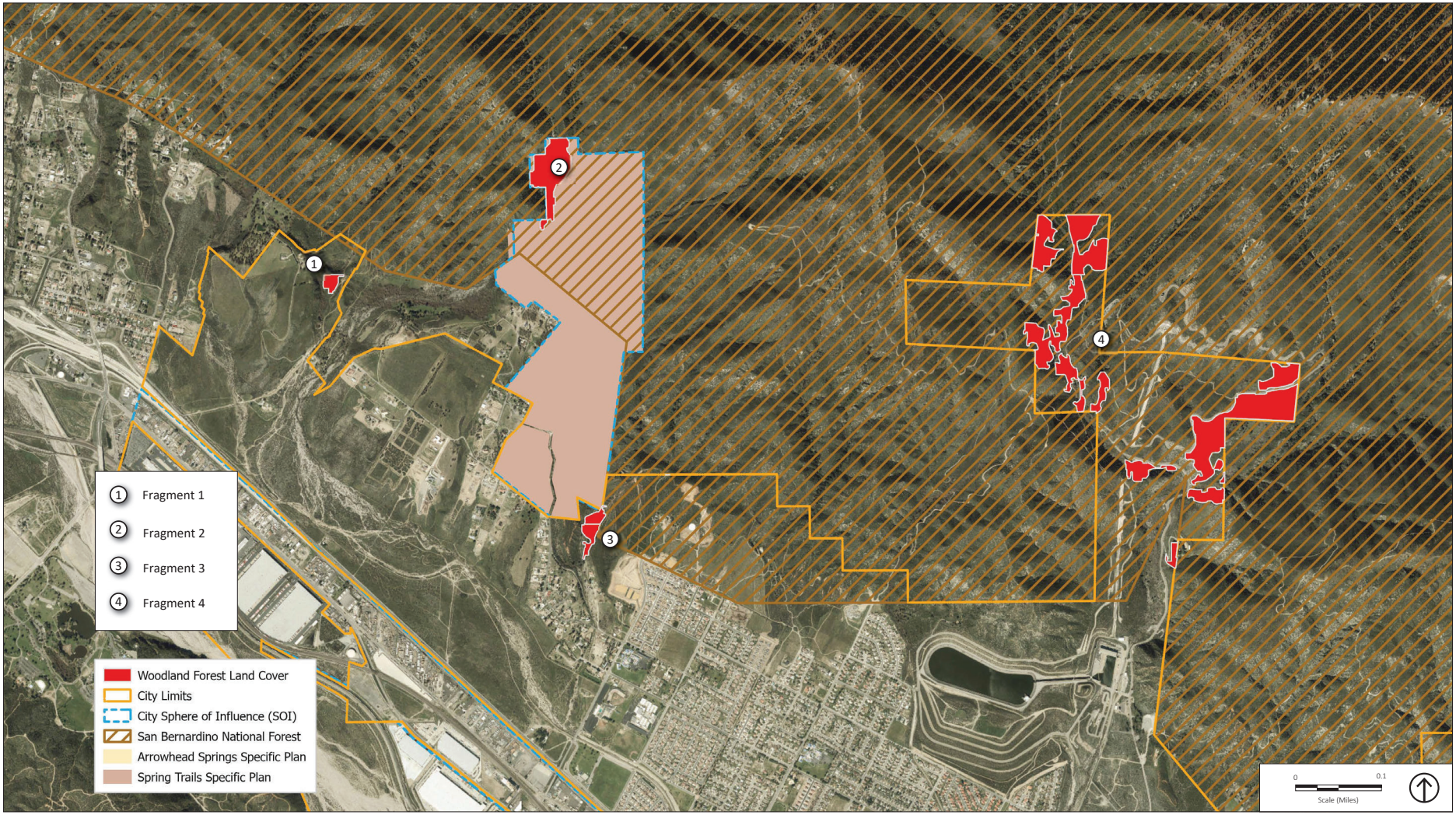
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

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 that, due to their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to non-forest use.

## METHODOLOGY

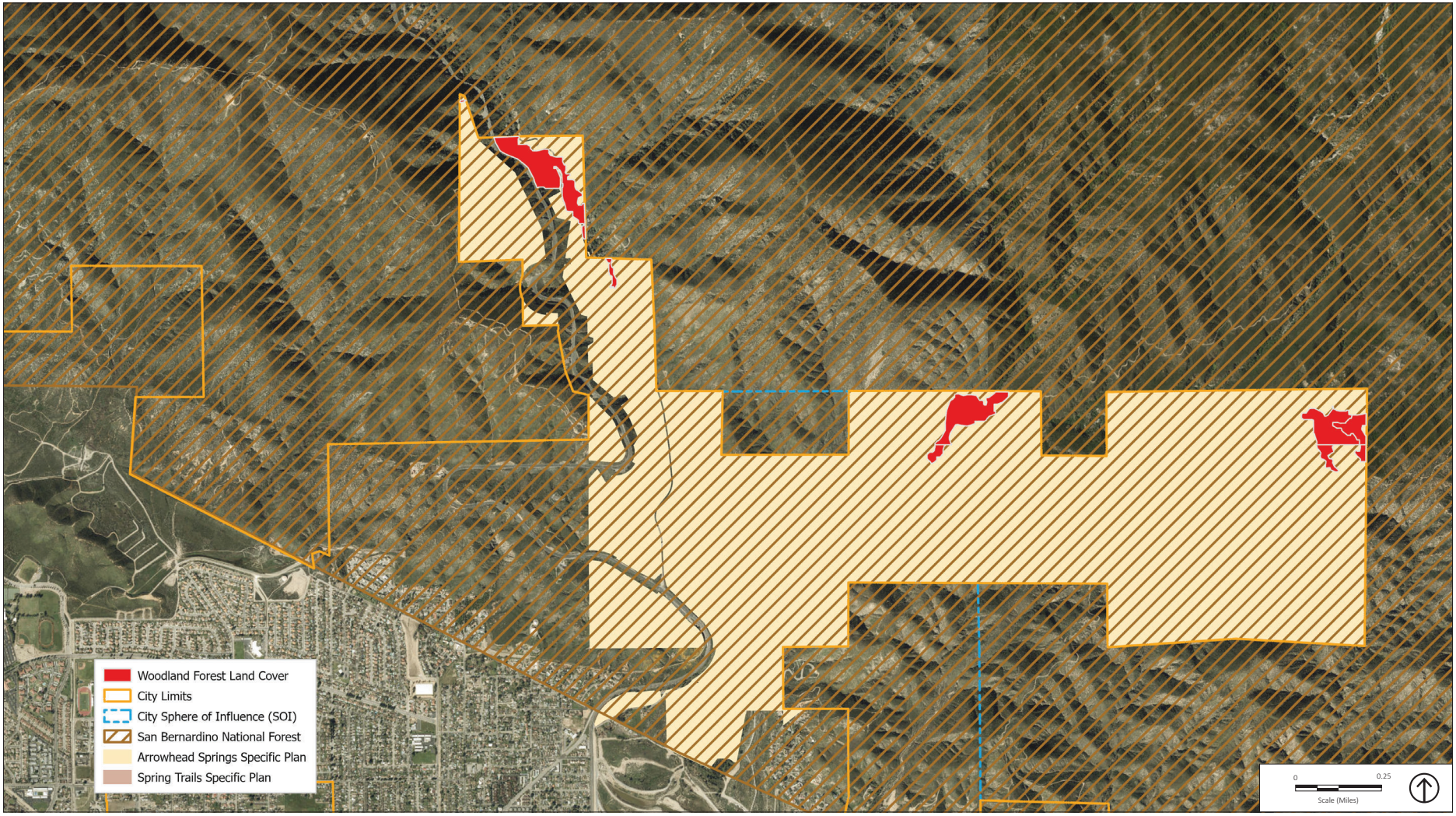
Impacts to agricultural and forestry resources under the proposed General Plan Update and DTSP are evaluated by determining whether the resources in these plan areas have the potential to be converted to a non-farmland or non-forest use under the proposed Land Use Plan. For the purposes of this analysis, agricultural resources are land designated by the FMMP as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and forestry resources are land with forest and woodland, as shown in Figures 3.2-2a through 3.2-2c. The proposed Land Use Plan does not contain any specific designations for the protection of farmland and forest land, but its Open Space (OS) designation is intended to preserve land as permanent open space. Land containing agricultural and forestry resources that is designated OS would remain in its existing condition under implementation of the proposed General Plan Update. Additionally, land that has already been converted to urban uses under existing conditions is not considered in this analysis.




Source: ECORP 2025; USFS 2025

Figure 3.2-2a
**Forest and Woodland in the General Plan Update Area**

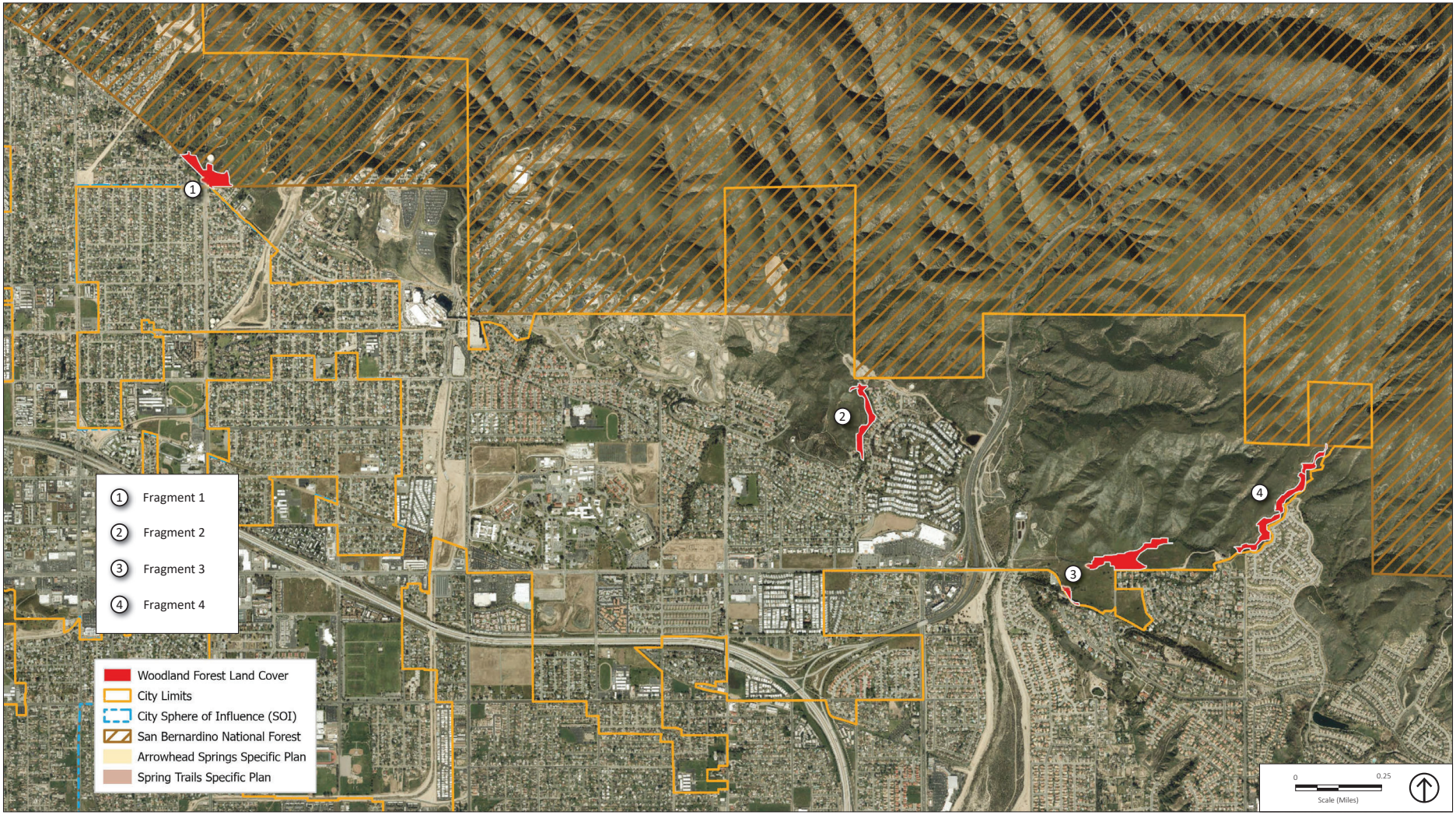
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Source: ECORP 2025; USFS 2025

Figure 3.2-2b
**Forest and Woodland in the General Plan Update Area**

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Source: ECORP 2025; USFS 2025

Figure 3.2-2c
**Forest and Woodland in the General Plan Update Area**

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## 3.2.4 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Table 3.2-2, the General Plan Update Area contains 2 acres of Prime Farmland and 11 acres of Farmland of Statewide Importance. Figure 3.2-1 shows these areas in greater detail, including satellite imagery of their existing uses.

The 2 acres of Prime Farmland are at the southeastern city border of Loma Linda, within the Gage Canal. This land is part of an approximately 50-acre parcel of active agricultural land in Loma Linda. Since the portion of this land within the city limits is narrow, and in a waterway, it is not considered Important Farmland that would be converted under the proposed General Plan Update. Additionally, its designation as Flood Control (FC) under the proposed Land Use Plan would maintain this land under its existing use as a flood control channel and limit its potential future conversion to an urban use.

The 11 acres of Farmland of Statewide Importance are at the San Bernardino Community Garden at 6th Street and Pedley Drive. This land is owned by the City and administered under the Parks and Recreation Department. Under the proposed Land Use Plan, this land would remain designated as Public Facilities (PF) and would continue to operate as a community garden. Therefore, no qualifying Important Farmland would be converted under the proposed General Plan Update. This impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

The DTSP Area is developed with existing urban uses and contains no Important Farmland. The FMMP designates the DTSP Area as “Urban and Built-up Land,” and the DTSP would therefore not convert any Important Farmland to nonagricultural use. Therefore, **no impact** would occur.

**Significance without Mitigation:** No Impact.

**b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update Area does not contain any active Williamson Act Contracts, nor is any land in the city or SOI designated or zoned for an agricultural use under the 2005 General Plan and existing Development Code. The proposed project would not conflict with existing agricultural zoning or a Williamson Act Contract. Therefore, there is **no impact**.

**Significance without Mitigation:** No Impact.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area does not contain any active Williamson Act Contracts, nor is any land in the city or SOI designated or zoned for an agricultural use under the 2005 General Plan and existing Development Code. The proposed project would not conflict with existing agricultural zoning or a Williamson Act Contract. Therefore, there is **no impact**.

**Significance without Mitigation:** No Impact.

**c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update Area does not contain any land with an existing timberland, forest land or Timberland Production zoning or land use designation. Therefore, the proposed project would not conflict with or cause the rezoning of land with these zones/designations. Therefore, there is **no impact**.

**Significance without Mitigation:** No Impact.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area does not contain any land with an existing timberland, forest land or Timberland Production zoning or land use designation. Therefore, the proposed project would not conflict with or cause the rezoning of land with these zones/designations. Therefore, there is **no impact**.

**Significance without Mitigation:** No Impact.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Under existing conditions, the General Plan Update Area contains approximately 206 acres of land with at least 20 percent tree cover. Table 3.2-3, *Proposed Land Use Plan Designations of Forest/Woodland Areas*, shows that 98 acres of this land would remain undeveloped under the proposed 'FC' designation of the Land Use Plan, and 72 acres is in the adopted Arrowhead Springs and Spring Trails Specific Plans. The remaining 37 acres is proposed to be residential designations and could be developed under the proposed General Plan Update.

**Table 3.2-3 Proposed Land Use Plan Designations of Forest/Woodland Areas**

| Proposed Land Use Designation | Acres |
|---|---|
| Flood Control (FC) | 98 |
| Residential Medium (RM) | 4 |
| Traditional Neighborhood (NT) | 1 |
| Residential Estate (RE) | 1 |
| Rural Residential (RR) | 31 |
| Specific Plan: Arrowhead Springs | 55 |
| Specific Plan: Spring Trails | 17 |

Source: Appendix D.

Though this forest/woodland has the potential to be converted under the proposed General Plan Update, as shown in Figures 3.2-2a through 3.2-2c, it is largely fragmented and in close proximity to existing development. Several portions are in steeply sloped canyons, including fragments #1 and #3 in Figure 3.2-2a and fragments #2 and #4 in Figure 3.2-2c. Development in these areas would be highly restricted under the Development Code Chapter 19.17, Hillside Management Overlay District. Overall, these 37 acres of forest/woodland are unlikely to be converted or provide opportunities for active management under the provisions of PRC Section 12220(g).

Additionally, Section 19.28.100 of the proposed Development Code Update would continue to implement the City's existing tree protections, requiring an arborist report and tree removal

plan for the removal of more than five trees within 36 months. This provision would ensure that the City's forestry resources are preserved or replaced under the proposed General Plan Update. As shown in Table 3.2-4, *Forest Land: Proposed General Plan Update Policies*, the proposed General Plan Update would also include policies that aim to protect the City's existing tree cover and minimize the conversion of forest land.

**Table 3.2-4 Forest Land Proposed General Plan Update Policies**

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-2.2 | **Natural Vegetation Conservation**. Maintain and conserve mature native trees, natural vegetation, stands of established trees, and other vegetation features for ecosystem, aesthetic, and water conservation purposes. |
| OSC-4.2 | **Open Space Corridors**. Identify areas for land acquisition, funding, and strategy to establish an open space corridor contiguous to the National Forest via Cable Creek and/or Devil Canyon, consistent with the San Bernardino National Forest Land Management Plan. |

As described above, there are no areas of forest/woodland in the General Plan Update Area that are viable for forest management and would be converted under the proposed General Plan Update. Fragments of forest/woodland on land designated for a nonforest use may face conversion under implementation of the General Plan Update, tree protections established by the proposed Development Code Update would ensure that tree cover is protected or replaced. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area does not contain any forest land, as defined in Public Resources Code Section 12220(g)), timberland, or timberland production land. The DTSP is largely built out with urban uses and contains no areas of significant tree cover. However, the DTSP includes a street tree program (see Section 8.6 of the DTSP) that aims to contribute to urban greening of the DTSP Area. Development under the DTSP would not result in the conversion of forest land. Therefore, there is **no impact**.

**Significance without Mitigation:** No impact.

**e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to non-forest use?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

This impact typically concerns the potential for agricultural and forestry lands in proximity to proposed urban uses to be converted due to financial pressure or incompatibility issues. Urban development adjacent to farmland or forest land could increase the land value of the nearby farm or forest land, increase the property tax, and provide an incentive for landowners to sell their farm or forest land for urban development. Agricultural or forestry operations may also face nuisance complaints from adjacent urban uses, leading to restrictions on activities and less productivity and profitability.

As discussed in Impacts a and c, the General Plan Update Area is largely urbanized and does not contain a significant amount of agricultural or forestry resources. The General Plan Update would result in the potential development or redevelopment of areas in proximity to the identified agricultural and forestry resources; however, given the site-specific circumstances of these areas, these resources are unlikely to be converted or are already not viable as productive agricultural or forest land. The City is surrounded by other urbanized cities lacking these resources and protected open space (i.e., the San Bernardino National Forest) where conversion would not occur. Therefore, the proposed project would not result in the conversion of agricultural or forest land due to other changes in the environment. There would be **no impact**.

**Significance without Mitigation:** No impact.

## DOWNTOWN SPECIFIC PLAN

As discussed in Impacts a and c, the DTSP is largely urbanized and does not contain a significant amount of agricultural or forestry resources. The DTSP would result in the potential development or redevelopment of areas in proximity to the identified agricultural and forestry resources; however, given the site-specific circumstances of these areas, these resources are unlikely to be converted or are already not viable as productive agricultural or forest land. The City is surrounded by other urbanized cities lacking these resources and protected open space (i.e., the San Bernardino National Forest) where conversion would not occur. Therefore, the proposed project would not result in the conversion of agricultural or forest land due to other changes in the environment. There would be **no impact**.

**Significance without Mitigation:** No impact.

## 3.2.5 Cumulative Impact Analysis

The geographic setting of cumulative agricultural and forestry impacts covers all qualifying Important Farmland and managed forestry land in San Bernardino County.

**Would the project have a cumulative effect related to agriculture and forestry resources?**

As discussed in Chapter 2, *Project Description*, the proposed project would result in new development in the General Plan Update Area and generally lead to the greater urbanization of the City. This growth would largely consist of infill in the City's existing urban centers. As discussed in the above impact discussions, the General Plan Update Area does not contain a significant amount of agricultural and forestry resources and would not result in conversion of areas containing Important Farmland or managed forestry resources. As shown in Table 3.2-1, the amount of Important Farmland in San Bernardino County has decreased by 58 percent since 1984, which is attributed to trends of greater urbanization and development of formerly agricultural-based communities. Agriculture remains an important industry in the rural areas of San Bernardino County, but the City of San Bernardino has long been a hub of urban development in the county, and development under the proposed General Plan Update would encourage further development of this already urbanized area. Therefore, the General Plan Update's increased growth potential may result in less pressure to develop other areas of San Bernardino County, including areas containing Important Farmland.

Though the General Plan Update Area is bordered by the San Bernardino National Forest and would permit new development near it, national forest lands are actively protected and managed by the US Forest Service. Pressure to convert these forestlands is unlikely due to their protected status. Additionally, as for agricultural resources, the proposed General Plan's aim to concentrate development in already urbanized areas may result in less pressure to develop existing forestry resources in the county. Therefore, the proposed project would not result in cumulatively considerable impacts to agricultural and forestry resources. This impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.2.6 References

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San Bernardino LAFCO (San Bernardino Local Area Formation Commission). 2024, May. *Policy & Procedure Manual*. https://sbclafco.org/wp-content/uploads/sites/60/Publications/LAFCO_Policy_and_Procedure_Manual_2024_5.pdf.

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# 3.3 AIR QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to air quality in a local and regional context from the updates to the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, referred to together as the "proposed project." This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). Criteria air pollutant emissions modeling for the General Plan Update is included in the following appendix to the DEIR:

- *AQ, GHG, and Energy Modeling*, PlaceWorks, October 2025 (Appendix C).

Transportation-sector impacts are based on trip generation and vehicle miles traveled (VMT), as provided by KOA in Appendices I-1 through I-3. Cumulative impacts related to air quality are based on the regional boundaries of the South Coast Air Basin (SoCAB).

## Terminology

The following are definitions for terms used throughout this section.

- **AAQS**: Ambient Air Quality Standards that define clean air, established to protect the health of sensitive communities.
- **CES**: CalEnviroScreen, a mapping tool that helps identify the California communities most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects.
- **Concentrations**: The amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter (µg/m3).
- **Criteria Air Pollutants**: Those air pollutants specifically identified for control under the Federal Clean Air Act (currently six: carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and particulates).
- **DPM:** Diesel particulate matter, exhaust from trucks, buses, trains, ships, and other equipment with diesel engines, containing a mixture of gases and solid particles.
- **Emissions**: The actual quantity of pollutant, measured in pounds per day or tons per year.
- **ppm**: Parts per million.
- **Sensitive receptor**: Land uses that are considered more sensitive to air pollution compared to others due to the types of population groups or activities involved. These land uses include residential, retirement facilities, hospitals, and schools.
- **TAC**: Toxic air contaminant.
- **µg/m$^3$**: Micrograms per cubic meter.
- **VMT**: Vehicle miles traveled.

## Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides ($NO_X$), sulfur dioxide ($SO_2$), coarse inhalable particulate matter ($PM_{10}$), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, CO, $SO_2$, nitrogen dioxide ($NO_2$), $PM_{10}$, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. VOC and $NO_X$ are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone ($O_3$) and $NO_2$ are the principal secondary pollutants.

Each of the primary and secondary criteria air pollutants and its known health effects are described below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines and motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (SoCAB), the highest ambient CO concentrations are generally found near traffic-congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated as being in attainment under the California AAQS and attainment (serious maintenance)[1] under the National AAQS (CARB 2025a).

- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols (South Coast AQMD 2005). There are no AAQS for VOCs. However, because they contribute to the formation of $O_3$, South Coast AQMD has established a significance threshold (South Coast AQMD 2023a). The health effects for ozone are described later in this section.

- **Nitrogen Oxides ($NO_X$)** are a by-product of fuel combustion and contribute to the formation of ground-level $O_3$, $PM_{10}$, and $PM_{2.5}$. The two major forms of $NO_X$ are nitric oxide (NO) and nitrogen dioxide ($NO_2$). NO is a colorless, odorless gas formed from atmospheric nitrogen

[1] A maintenance area refers to a previously nonattainment area that has been redesignated to "maintenance" after it meets the standards and additional redesignation requirements in the Clean Air Act (Section 107(d)(3)(E)).

and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of $NO_X$ produced by combustion is NO, but NO reacts quickly with oxygen to form $NO_2$, creating the mixture of NO and $NO_2$ commonly called $NO_X$. $NO_2$ is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, $NO_2$ is only potentially irritating. $NO_2$ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. $NO_2$ exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term $NO_2$ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term $NO_2$ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated in attainment (maintenance) under the National AAQS and attainment under the California AAQS (CARB 2025a).

- **Sulfur Dioxide ($SO_2$)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of $SO_2$. When sulfur dioxide forms sulfates ($SO_4$) in the atmosphere, together these pollutants are referred to as sulfur oxides ($SO_X$). Thus, $SO_2$ is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, $SO_2$ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to $SO_2$, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations, and when combined with particulates, $SO_2$ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (South Coast AQMD 2005, 2022; USEPA 2025a). The SoCAB is designated as attainment under the California and National AAQS (CARB 2025a).

- **Suspended Particulate Matter ($PM_{10}$ and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or $PM_{10}$, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤0.01 millimeter). Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤0.002.5 millimeter). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both $PM_{10}$ and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US Environmental Protection Agency's

(EPA) scientific review concluded that $PM_{2.5}$, which penetrates deeply into the lungs, is more likely than $PM_{10}$ to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing) (South Coast AQMD 2005, 2022). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.0001 millimeter) have human health implications because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (South Coast AQMD 2022). However, the USEPA and the California Air Resources Board (CARB) have not adopted AAQS to regulate these particulates. Diesel particulate matter is classified by CARB as a carcinogen (CARB 1999, 2023d). Particulate matter can also cause environmental effects such as visibility impairment,[2] environmental damage,[3] and aesthetic damage[4] (South Coast AQMD 2005, 2022; USEPA 2023a). The SoCAB is a nonattainment area for $PM_{2.5}$ under California and National AAQS and a nonattainment area for $PM_{10}$ under the California AAQS (CARB 2025a).[5]

- **Ozone ($O_3$)** is a key ingredient of "smog" and is a gas that is formed when VOCs and $NO_X$, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. $O_3$ is a secondary criteria air pollutant. $O_3$ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. $O_3$ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing $O_3$ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level $O_3$ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. $O_3$ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas. In particular, $O_3$ harms sensitive vegetation during the growing season (South Coast AQMD 2005, 2022; USEPA 2024a). The SoCAB is designated

[2] $PM_{2.5}$ is the main cause of reduced visibility (haze) in parts of the United States.

[3] Particulate matter can be carried over long distances by wind and then settle on ground or water, making lakes and streams acidic; changing the nutrient balance in coastal waters and large river basins; depleting the nutrients in soil; damaging sensitive forests and farm crops; and affecting the diversity of ecosystems.

[4] Particulate matter can stain and damage stone and other materials, including culturally important objects such as statues and monuments.

[5] CARB approved the South Coast AQMD's request to redesignate the SoCAB from serious nonattainment for $PM_{10}$ to attainment for $PM_{10}$ under the National AAQS on March 25, 2010, because the SoCAB did not violate federal 24-hour $PM_{10}$ standards from 2004 to 2007. The USEPA approved the State of California's request to redesignate the South Coast $PM_{10}$ nonattainment area to attainment of the $PM_{10}$ National AAQS, effective on July 26, 2013.

extreme nonattainment under the California AAQS (1-hour and 8-hour) and National AAQS (8-hour) (CARB 2025a).

- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (South Coast AQMD 2005, 2022; USEPA 2025a). The major sources of lead emissions have historically been mobile and industrial sources. As a result of the USEPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector dramatically declined by 95 percent between 1980 and 1999, and levels of lead in the air decreased by 94 percent between 1980 and 1999. Today, the highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions today are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. However, in 2008 the USEPA and CARB adopted more strict lead standards, and special monitoring sites immediately downwind of lead sources recorded very localized violations of the new state and federal standards.[6] As a result of these violations, the Los Angeles County portion of the SoCAB is designated as nonattainment under the National AAQS for lead (South Coast AQMD 2012; CARB 2025a). However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). Because emissions of lead are found only in projects that are permitted by South Coast AQMD, lead is not a pollutant of concern for the proposed project.

Table 3.3-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

[6] Source-oriented monitors record concentrations of lead at lead-related industrial facilities in the SoCAB, which include Exide Technologies in the City of Commerce; Quemetco, Inc., in the City of Industry; Trojan Battery Company in Santa Fe Springs; and Exide Technologies in Vernon. Monitoring conducted between 2004 through 2007 showed that the Trojan Battery Company and Exide Technologies exceed the federal standards (South Coast AQMD 2012).

**Table 3.3-1 Criteria Air Pollutant Health Effects Summary**

| Pollutant | Health Effects | Examples of Sources |
|---|---|---|
| Carbon Monoxide (CO) | ▪ Chest pain in heart patients<br>▪ Headaches, nausea<br>▪ Reduced mental alertness<br>▪ Death at very high levels | Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves |
| Ozone ($O_3$) | ▪ Cough, chest tightness<br>▪ Difficulty taking a deep breath<br>▪ Worsened asthma symptoms<br>▪ Lung inflammation | Atmospheric reaction of organic gases with nitrogen oxides in sunlight |
| Nitrogen Dioxide ($NO_2$) | ▪ Increased response to allergens<br>▪ Aggravation of respiratory illness | Same as carbon monoxide sources |
| Particulate Matter ($PM_{10}$ and $PM_{2.5}$) | ▪ Hospitalizations for worsened heart diseases<br>▪ Emergency room visits for asthma<br>▪ Premature death | Cars and trucks (particularly diesels)<br>Fireplaces and woodstoves<br>Windblown dust from overlays, agriculture, and construction |
| Sulfur Dioxide ($SO_2$) | ▪ Aggravation of respiratory disease (e.g., asthma and emphysema)<br>▪ Reduced lung function | Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes |
| Lead (Pb) | ▪ Behavioral and learning disabilities in children<br>▪ Nervous system impairment | Contaminated soil |

Source: CARB 2025b.

## TOXIC AIR CONTAMINANTS

CARB has identified other air pollutants as toxic air contaminants (TAC), which are pollutants that may cause serious, long-term effects. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2025b). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by

calculating the health risks associated with a given exposure. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the project being particulate matter from diesel-fueled engines.

### Diesel Particulate Matter

In 1998, CARB identified particulate emissions from diesel-fueled engines (diesel PM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10, Section 2485,** Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **13 CCR Chapter 10, Section 2480,** Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **13 CCR Section 2477 and Article 8,** Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

Ambient air quality standards have been adopted at the state and federal levels for criteria air pollutants. In addition, both the state and federal government regulate the release of TACs. The proposed project is in the SoCAB and is subject to the rules and regulations imposed by the South Coast AQMD, the California AAQS adopted by CARB, and National AAQS adopted by the US Environmental Protection Agency (EPA). Federal, state, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized in this section.

## 3.3.1 Regulatory Framework

### FEDERAL AND STATE

### Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS as well as the Prevention of Significant Deterioration program. The 1990 amendments represent the

latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 3.3-2, *Ambient Air Quality Standards for Criteria Air Pollutants*. These pollutants are $O_3$, $NO_2$, CO, $SO_2$, $PM_{10}$, $PM_{2.5}$, and Pb. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

**Table 3.3-2 Ambient Air Quality Standards for Criteria Pollutants**

| Pollutant | Averaging Time | California Standard[1] | Federal Primary Standard[2] | Major Pollutant Sources |
|---|---|---|---|---|
| Ozone ($O_3$)[3] | 1 hour | 0.09 ppm | * | Motor vehicles, paints, coatings, and solvents. |
| | 8 hours | 0.070 ppm | 0.070 ppm | |
| Carbon Monoxide (CO) | 1 hour | 20 ppm | 35 ppm | Internal combustion engines, primarily gasoline-powered motor vehicles. |
| | 8 hours | 9.0 ppm | 9 ppm | |
| Nitrogen Dioxide ($NO_2$) | Annual Arithmetic Mean | 0.030 ppm | 0.053 ppm | Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads. |
| | 1 hour | 0.18 ppm | 0.100 ppm | |
| Sulfur Dioxide ($SO_2$)[4] | Annual Arithmetic Mean | * | 0.010 ppm | Fuel combustion, chemical plants, sulfur recovery plants, and metal processing. |

## Table 3.3-2 Ambient Air Quality Standards for Criteria Pollutants

| Pollutant | Averaging Time | California Standard[1] | Federal Primary Standard[2] | Major Pollutant Sources |
|---|---|---|---|---|
| | 1 hour | 0.25 ppm | 0.075 ppm | |
| | 24 hours | 0.04 ppm | * | |
| Respirable Coarse Particulate Matter ($PM_{10}$) | Annual Arithmetic Mean | 20 µg/m$^3$ | * | Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays). |
| | 24 hours | 50 µg/m$^3$ | 150 µg/m$^3$ | |
| Respirable Fine Particulate Matter ($PM_{2.5}$)[5,6] | Annual Arithmetic Mean | 12 µg/m$^3$ | 9 µg/m$^3$ | Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays). |
| | 24 hours | * | 35 µg/m$^3$ | |
| Lead (Pb) | 30-Day Average | 1.5 µg/m$^3$ | * | Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline. |
| | Calendar Quarter | * | 1.5 µg/m$^3$ | |
| | Rolling 3-Month Average | * | 0.15 µg/m$^3$ | |
| Sulfates ($SO_4$)[7] | 24 hours | 25 µg/m$^3$ | * | Industrial processes. |
| Visibility Reducing Particles | 8 hours | ExCo =0.23/km visibility of 10≥ miles | No Federal Standard | Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. |

**Table 3.3-2 Ambient Air Quality Standards for Criteria Pollutants**

| Pollutant | Averaging Time | California Standard[1] | Federal Primary Standard[2] | Major Pollutant Sources |
|---|---|---|---|---|
| Hydrogen Sulfide | 1 hour | 0.03 ppm | No Federal Standard | Hydrogen sulfide ($H_2S$) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. |
| Vinyl Chloride | 24 hours | 0.01 ppm | No Federal Standard | Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents. |

Source: CARB 2024; USEPA 2025c.

Notes: ppm: parts per million; µg/m3: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1. California standards for O3, CO (except 8-hour Lake Tahoe), SO2 (1 and 24 hour), NO2, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than O3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

3. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

4. On December 27, 2024, the secondary annual SO2 standard was revised to an annual average, averaged over three consecutive years, with a level of 10 parts per billion (ppb).

5. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m3 to 12.0 µg/m3. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

6. On February 7, 2024, the national annual PM2.5 standard was lowered from 12 µg/m3 to 9 µg/m3. The existing national 24-hour PM2.5 standards (primary and secondary), secondary annual PM2.5 standard, and PM10 standards (primary and secondary) were retained.

7. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions:

- **Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces greenhouse gas emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.

- **Title 20 of California Code of Regulations (CCR): Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances.

- **24 CCR, Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977.

- **24 CCR, Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.[7]

## California Air Resources Board

CARB is a part of the California Environmental Protection Agency and responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (see Table 3.3-1), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State

[7] The green building standards became mandatory in the 2010 edition of the code.

Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the EPA.

## Nuisance Regulations

Health and Safety Code Section 41700 states,

> ... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

This section also applies to objectionable odors.

## Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to toxic air contaminants (TAC) is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health" (17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate "toxics best available control technology" to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- **13 CCR Chapter 10 Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Regulation generally restricting on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.

- **13 CCR Chapter 10 Section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally, restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.

- **13 CCR Section 2477 and Article 8:** Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate. Regulations established to control emissions associated with diesel-powered TRUs.

## REGIONAL

### Air Quality Management Planning

The South Coast AQMD is the agency responsible for improving air quality in the SoCAB and ensuring that the National and California AAQS are attained and maintained. South Coast AQMD is responsible for preparing the air quality management plan (AQMP) for the SoCAB in coordination with the Southern California Association of Governments (SCAG). The AQMP is a regional strategy plan to achieve air quality standards by examining emissions, looking at regional growth projections, and the impact of existing and proposed control measures to provide healthful air in the long-term. Since 1979, a number of AQMPs have been prepared.

The Clean Air Act requires CARB to develop a SIP that describes how an area will attain National AAQS. The AQMP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the SIP. Areas are classified as attainment or nonattainment areas for a particular pollutant depending on whether they meet the AAQSs.

#### *2022 AQMP*

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, as an update to the 2016 AQMP. On October 1, 2015, the USEPA strengthened the National AAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion (ppb) (2015 Ozone National AAQS). The SoCAB is currently classified as an “extreme” nonattainment for the 2015 Ozone National AAQS. Meeting the 2015 federal ozone standard requires reducing $NO_X$ emissions, the key pollutant that creates ozone, by 67 percent more than is required by adopted rules and regulations by 2037. The only way to achieve the required $NO_X$ reductions is through extensive use of zero emission (ZE) technologies across all stationary and mobile sources. South Coast AQMD’s primary authority is over stationary sources which account for approximately 20 percent of NOX emissions. The overwhelming majority of $NO_X$ emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile sources that are mostly beyond the

South Coast AQMD's control. The region will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP requires substantial reliance on future deployment of advanced technologies to meet the standard. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low-$NO_X$ technologies and (2) developing new ZE and ultra-low $NO_X$ technologies for use in cases where the technology is not currently available. South Coast AQMD is prioritizing distribution of incentive funding in environmental justice areas and seeking opportunities to focus benefits on the most disadvantaged communities (South Coast AQMD 2022).

### *South Coast AQMD $PM_{2.5}$ Redesignation Request and Maintenance Plan*

In 1997, the USEPA adopted the 24-hour fine $PM_{2.5}$ standard of 65 µg/$m^3$. In 2006, this standard was lowered to a more health-protective level of 35 µg/$m^3$. The SoCAB is designated nonattainment for both the 65 µg/$m^3$ and 35 µg/$m^3$ 24-hour $PM_{2.5}$ standards (24-hour $PM_{2.5}$ standards). In 2020, monitored data demonstrated that the SoCAB attained both 24-hour $PM_{2.5}$ standards. The South Coast AQMD developed the "2021 Redesignation Request and Maintenance Plan" for the 1997 and 2006 24 hour $PM_{2.5}$ Standards for the SoCAB $PM_{2.5}$ Redesignation Request and Maintenance Plan, demonstrating that the SoCAB has met the requirements to be redesignated to attainment for the 24-hour $PM_{2.5}$ standards (South Coast AQMD 2021b).

### *Lead Implementation Plan*

In 2008, the USEPA designated the Los Angeles County portion of the SoCAB as a nonattainment area under the federal lead (Pb) classification because of the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in the City of Vernon and the City of Industry that exceeded the new standard in the 2007 to 2009 period. The remainder of the SoCAB, outside the county nonattainment area, remains in attainment of the new 2008 lead standard. On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the USEPA revised in 2008. Lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011. The SIP revision was submitted to the USEPA for approval and was approved in March 2014 (CARB 2014).

## Assembly Bill 617, Community Air Protection Program

AB 617 (C. Garcia, Chapter 136, Statutes of 2017) requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. In response to AB 617, CARB established the Community Air Protection Program.

Air districts are required to host workshops to help identify disadvantaged communities disproportionately affected by poor air quality. Once the criteria for identifying the highest priority locations have been identified and the communities have been selected, new community monitoring systems are installed to track and monitor community-specific air pollution goals. In 2018 CARB prepared an air monitoring plan (Community Air Protection Blueprint) that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, the Blueprint is required to be updated every five years.

Under AB 617, CARB is also required to prepare a statewide strategy to reduce TACs and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology; adopt new rules requiring the latest best available retrofit control technology for all criteria pollutants for which an area has not achieved attainment of California AAQS; and provide uniform, statewide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the communities impacted by air pollution that CARB identifies.

### *Community Emissions Reduction Plan: San Bernardino, Muscoy*

In 2018, South Coast AQMD and CARB designated the San Bernardino community as AB 617 community, which mandates a community-driven air pollution reduction plans in the State's most impacted communities (CARB 2025c). The Community Emissions Reduction Plan (CERP) outlines the actions and commitments by the Community Steering Committee (CSC), the South Coast AQMD, and the CARB to reduce air pollution in the San Bernardino, Muscoy community. This plan aims to reduce local air pollution and community exposure through targeted actions such as regulatory measures, incentives for cleaner technologies, public outreach, and air monitoring, while collaborating with partners to maximize impact (South Coast AQMD 2019).

## South Coast AQMD Rules and Regulations

All projects are subject to South Coast AQMD rules and regulations in effect at the time of activity, including:

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.

- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any

source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth-moving and grading activities.

- **Rule 445, Wood Burning Devices.** In general, the rule prohibits new developments from the installing wood-burning devices. This rule is intended to reduce the emission of particulate matter from such devices and applies to manufacturers and sellers of wood-burning devices, commercial sellers of firewood, and property owners and tenants that operate a wood-burning device.

- **Rule 1113, Architectural Coatings.** This rule serves to limit the VOC content of architectural coatings used on projects in the South Coast AQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the South Coast AQMD must comply with the current VOC standards in this rule.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities.** The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

- **Rule 1166, Volatile Organic Compound Emissions from Decontaminated Soil.** Under this rule, an excavation plan is required, and excavation operations are required to be monitored for VOC concentrations.

- **Rule 1466, Control of Particulate Emissions from Soils with Toxic Air Contaminants,** to minimize the amount of off-site fugitive dust emissions containing TACs by reducing

particulate emissions in the ambient air as a result of earthmoving activities, including excavating, grading, handling, treating, stockpiling, transferring, and removing soil that contains applicable TACs. Components of the fugitive dust control plan are required to include the following measures: fencing that is a minimum of six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of 50 ± 5 percent; monitoring; notification; signage; and recordkeeping.

### LOCAL

#### City of San Bernardino General Plan

The existing City of San Bernardino General Plan was adopted in November 2005 (San Bernardino 2005). Existing goals and policies aimed at reducing air quality impacts are primarily found in the Natural Resources and Conservation Element, as well as the Circulation Element.

#### City of San Bernardino Municipal Code

The San Bernardino Municipal Code (SBMC) is organized by title, chapter, and sections. Most provisions related to air quality are in the following chapters:

- **Chapter 8.97, Smoking Cannabis in Public Places.** This chapter is intended to protect the good health and well-being of the residents from negative effects of secondhand cannabis smoke.
- **Chapter 12.44, Obstructions.** Section 12.44.070, Maintenance of Premises, requires that owner or occupants of houses or other premises in the city shall not create offensive odors to the surrounding environment.
- **Chapter 15.04, Building Codes.** This chapter of the SBMC adopts the State Building Code under Title 24, Sections Parts 1 through 6, 8, 9, and 11 of the CCR known and designated as the 2025 California Building Code.
- **Chapter 17.08, Mobile Source Air Pollution Ordinance.** This chapter of the SBMC is intended to support the South Coast AQMD's imposition of the vehicle registration fee and to bring the city into compliance with the requirements set forth in Cal. Health and Safety Code, Section 44243 in order to receive fee revenues for the purpose of implementing programs to reduce air pollution from motor vehicles.

## 3.3.2 Existing Conditions

### SOUTH COAST AIR BASIN

The project region is in the South Coast Air Basin (SoCAB), which includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The SoCAB is in a coastal plain with connecting broad valleys and low hills and is bounded by the Pacific

Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. This usually mild weather pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds (South Coast AQMD 2005).

## METEOROLOGY

### Temperature and Precipitation

The annual average temperature varies little throughout the SoCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November to April.

### Humidity

Although the SoCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SoCAB by offshore winds. Periods of heavy fog are frequent, especially along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SoCAB (South Coast AQMD 2005).

### Wind

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season.

Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SoCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SoCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

## Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the Project area (South Coast AQMD 2005).

## SoCAB NONATTAINMENT AREAS

The AQMP provides the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the SIP. Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet the ambient air quality standards. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

- ***Unclassified.*** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- ***Attainment.*** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- ***Nonattainment.*** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- ***Nonattainment/Transitional.*** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SoCAB is shown in Table 3.3-3, *Attainment Status of Criteria Air Pollutants in the South Coast Air Basin*.

**Table 3.3-3 Attainment Status of Criteria Pollutants in the South Coast Air Basin**

| Pollutant | State | Federal |
|---|---|---|
| Ozone – 1-hour | Extreme Nonattainment | No Federal Standard |
| Ozone – 8-hour | Extreme Nonattainment | Extreme Nonattainment |
| $PM_{10}$ | Serious Nonattainment | Attainment |
| $PM_{2.5}$ | Nonattainment | Nonattainment[1] |
| CO | Attainment | Attainment |
| $NO_2$ | Attainment | Attainment |
| $SO_2$ | Attainment | Attainment |
| Lead | Attainment | Nonattainment (Los Angeles County only)[2] |
| All others | Attainment/Unclassified | Attainment/Unclassified |

Source: CARB 2025a.

1. The SoCAB is pending a resignation request from nonattainment to attainment for the 24-hour federal PM2.5 standards. The 2021 PM2.5 Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow the USEPA to redesignate the SoCAB to attainment for the 65 µg/m3 and 35 µg/m3 24-hour PM2.5 standards. CARB submitted the 2021 PM2.5 Redesignation Request to the USEPA as a revision to the California SIP (CARB 2021).

2. In 2010, the Los Angeles portion of the SoCAB was designated nonattainment for lead under the new 2008 federal AAQS as a result of large industrial emitters. Remaining areas for lead in the SoCAB are unclassified. However, lead concentrations in this nonattainment area have been below the level of the federal standard since December 2011 (South Coast AQMD 2012). On May 24, 2012, CARB approved the SIP revision for the federal lead standard, which the USEPA revised in 2008. The SIP revision was submitted to the USEPA for approval and was approved in March 2014.

## MULTIPLE AIR TOXICS EXPOSURE STUDY V

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study on existing ambient concentrations of TACs and the potential health risks from air toxics in the SoCAB. In April 2021, South Coast AQMD released the latest update to the MATES study, MATES V. The first MATES analysis, MATES I, began in 1986 but was limited because of the technology available at the time. Conducted in 1998, MATES II was the first MATES iteration to include a comprehensive monitoring program, an air toxics emissions inventory, and a modeling component. MATES III was conducted in 2004 to 2006, with MATES IV following in 2012 to 2013.

MATES V uses measurements taken during 2018 and 2019, with a comprehensive modeling analysis and emissions inventory based on 2018 data. The previous MATES studies quantified the cancer risks based on the inhalation pathway only. MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been reexamined using current Office of Environmental Health Hazards Assessment (OEHHA) and

California Environmental Protection Agency (CalEPA) risk assessment methodologies and modern statistical methods to examine the trends over time.

The MATES V study showed that cancer risk in the SoCAB decreased to 454 in a million from 997 in a million in the MATES IV study. Overall, air toxics cancer risk in the SoCAB decreased by 54 percent since 2012 when MATES IV was conducted. MATES V showed the highest risk locations near the Los Angeles International Airport and the Ports of Long Beach and Los Angeles. Diesel particulate matter (DPM) continues to be the major contributor to air toxics cancer risk (approximately 72 percent of the total cancer risk). Goods movement and transportation corridors have the highest cancer risk. Transportation sources account for 88 percent of carcinogenic air toxics emissions, and the remainder is from stationary sources, which include large industrial operations such as refineries and power plants as well as smaller businesses such as gas stations and chrome-plating facilities (South Coast AQMD 2021a).

Figure 3.3-1, *South Coast AQMD MATES V Cancer Risk*, shows the results of the inhalation cancer risk from the MATES V study. The potential cancer risk is expressed as the incremental number of potential cancer cases that could be developed per million people, assuming that the population is exposed to the substance at a constant annual average concentration over a presumed 70-year lifetime.

## Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project area are best documented by measurements taken by the South Coast AQMD. The project area is in Source Receptor Area (SRA) 34: Central San Bernardino Valley.[8] The air quality monitoring station with the most recent data closest to the project area is the San Bernardino-4th Street Monitoring Station, which is one of 31 monitoring stations South Coast AQMD operates and maintains within the SoCAB.[9] This station monitors one-hour and eight-hour $O_3$, $NO_2$, $PM_{10}$, and $PM_{2.5}$. Table 3.3-4, *Ambient Air Quality Monitoring Summary*, shows that the area commonly exceeds the state and federal one-hour and eight-hour $O_3$ standards and occasionally exceeds the federal $PM_{10}$ and federal $PM_{2.5}$ standards within the last four years.

[8] Per South Coast AQMD Rule 701, an SRA is defined as "A source area is that area in which contaminants are discharged and a receptor area is that area in which the contaminants accumulate and are measured. Any of the areas can be a source area, a receptor area, or both a source and receptor area." There are 37 SRAs within the South Coast AQMD's jurisdiction.

[9] Locations of the SRAs and monitoring stations are shown here: http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

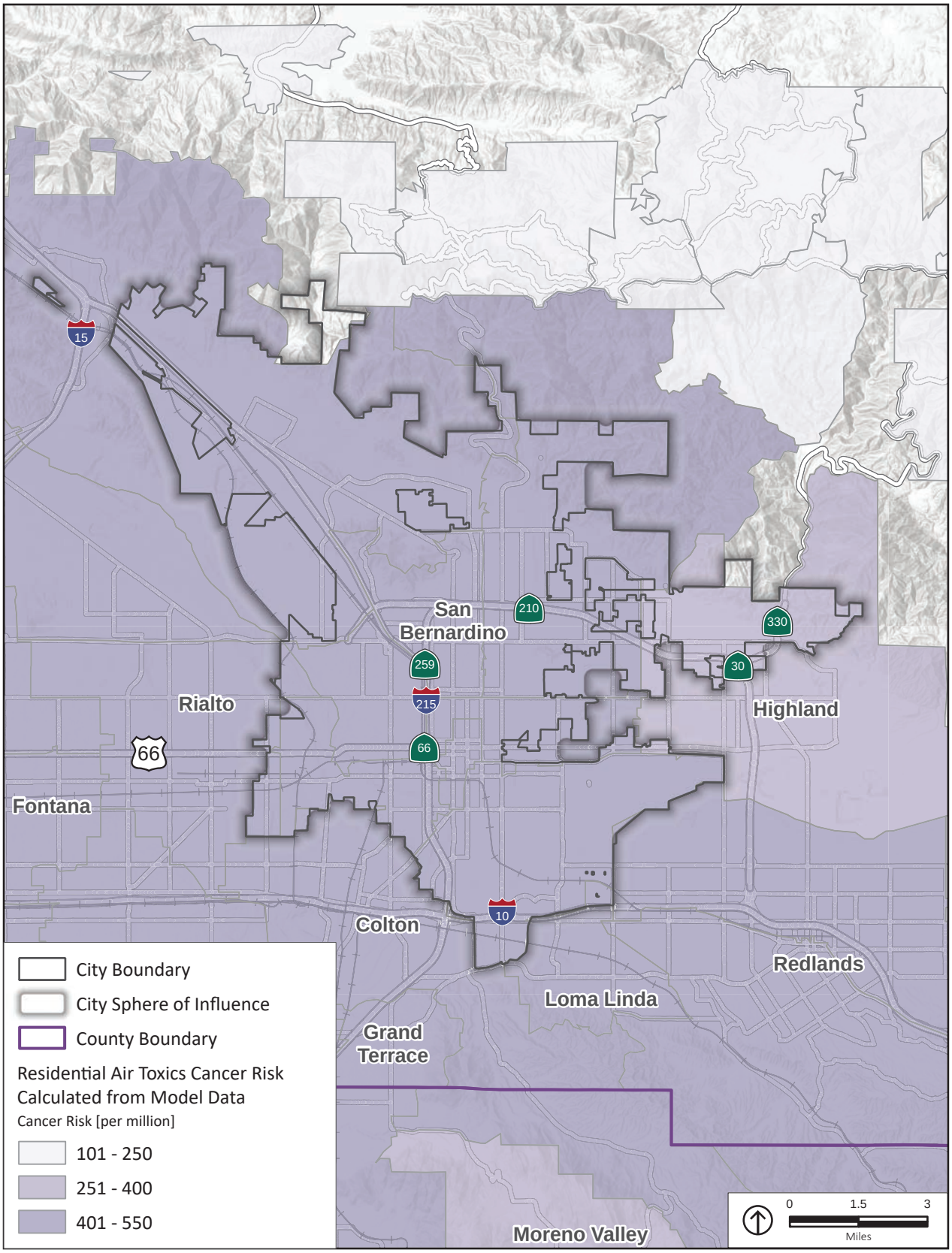
## Table 3.3-4 Ambient Air Quality Monitoring Summary

| Pollutant/Standard | Number of Days Threshold Were Exceeded and Maximum Levels During Such Violations[1,2] | | | |
|---|---|---|---|---|
| | 2021 | 2022 | 2023 | 2024 |
| **Ozone ($O_3$)** | | | | |
| State 1-Hour ≥ 0.09 ppm (days exceed threshold) | 66 | 60 | 58 | 82 |
| State & Federal 8-hour ≥ 0.070 ppm (days exceed threshold) | 98 | 96 | 84 | 109 |
| Max. 1-Hour Conc. (ppm) | 0.142 | 0.128 | 0.143 | 0.140 |
| Max. 8-Hour Conc. (ppm) | 0.112 | 0.105 | 0.118 | 0.121 |
| **Nitrogen Dioxide ($NO_2$)** | | | | |
| State 1-Hour ≥ 0.18 ppm (days exceed threshold) | 0 | 0 | 0 | 0 |
| Max. 1-Hour Conc. (ppb) | 0.0563 | 0.0526 | 0.0560 | 0.0591 |
| **Coarse Particulates ($PM_{10}$)** | | | | |
| State 24-Hour > 50 µg/m$^3$ (days exceed threshold) | 4 | * | 0 | * |
| Federal 24-Hour > 150 µg/m$^3$ (days exceed threshold) | 1 | 1 | 0 | 0 |
| Max. 24-Hour Conc. (µg/m$^3$) | 182.4 | 177.8 | * | 149.3 |
| **Fine Particulates ($PM_{2.5}$)** | | | | |
| Federal 24-Hour > 35 µg/m$^3$ (days exceed threshold) | 1 | 2 | 1 | 4 |
| Max. 24-Hour Conc. (µg/m$^3$) | 57.9 | 40.1 | 52.9 | 66.7 |

Source: CARB 2025d.

Notes: ppm = parts per million; ppb = parts per billion; µg/m$^3$ = micrograms per cubic meter; * = Data not available

1. Data for $O_3$, $NO_2$, $PM_{2.5}$, and $PM_{10}$ from San Bernardino-4th Street Monitoring Station.
2. Most recent data available as of September 2025.




Source: South Coast Air Quality Management District, 2021.

Figure 3.3-1
**South Coast AQMD MATES V Cancer Risk**

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## Existing Emissions

The City of San Bernardino consists of a mix of residential neighborhoods, commercial corridors and centers, industrial districts, civic and educational facilities, parkland, and open spaces. These uses currently generate criteria air pollutant emissions from natural gas use for energy, heating, and cooking; vehicle trips associated with each land use; and area sources such as landscaping equipment and consumer cleaning products.[10] Table 3.3-5, *Existing Criteria Air Pollutant Emissions Inventory*, shows the average daily emissions inventory currently associated with the existing land uses in the plan area.

**Table 3.3-5 Existing Criteria Air Pollutant Emissions Inventory**

| Sector | Existing Criteria Air Pollutant Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | SO2 | $PM_{10}$ | $PM_{2.5}$ |
| Transportation[1] | 271 | 2,959 | 14,785 | 65 | 466 | 177 |
| Energy[2] | 54 | 949 | 580 | 6 | 75 | 75 |
| Area – Off-Road Equipment[3] | 738 | 551 | 19,727 | 1 | 17 | 13 |
| Area – Consumer Products[4] | 2,697 | — | — | — | — | — |
| **Total** | **4,263** | **4,471** | **36,063** | **74** | **694** | **400** |

1. EMFAC2021 Version 1.0.2 was used for this analysis because EMFAC2025 v2.1.1 was not publicly available at the time the analysis was conducted. Based on daily VMT provided by KOA (see Appendix I-1).

2. Based on natural gas use provided by SoCalGas, 2025.

3. Off-Road Web Query Version 1.1.2.

4. Based on CalEEMod 2022 User's Guide methodology.

### *Permitted Sources of Emissions*

South Coast AQMD regulates stationary sources of emissions through source-specific rules that have been adopted to reduce criteria air pollutant emissions and TACs. South Coast AQMD maintains the Facility Information Detail (FIND) database of permitted facilities in its region. Permitted sources include smaller sources such as gas stations and chrome-plating facilities as well as large sources such as refineries and power stations. Figure 3.3-2, *South Coast AQMD Permitted Facilities,* identifies permitted sources of emissions in the project area that are regulated directly by South Coast AQMD. Permitted sources of emissions are generally clustered at major intersections of commercial corridors and in industrial areas of the project area.

[10] Emissions from permitted sources are excluded from the existing emissions inventory because the reductions associated with the Industrial sector are regulated separately by South Coast AQMD and are not under the jurisdiction of the City of San Bernardino.

## Sensitive Receptors

Some land uses are considered more sensitive to air pollution (i.e., TACs) than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent because the majority of the workers tend to stay indoors most of the time. In addition, the workforce is generally the healthiest segment of the population.

### *Placement of New Sensitive Receptors*

Because placement of sensitive land uses falls outside CARB's jurisdiction, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to address the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources.

CARB's recommendations on the siting of new sensitive land uses are identified in Table 3.3-6, *CARB Recommendations for Siting New Sensitive Land Uses*. They were based on a compilation of recent studies that evaluated data on the adverse health effects ensuing from proximity to air pollution sources. The key observation in these studies is that proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects. There are three carcinogenic TACs that constitute the majority of the known health risks from motor vehicle traffic: DPM from trucks and benzene and 1,3-butadiene from passenger vehicles.

**Table 3.3-6 CARB Recommendations for Siting New Sensitive Land Uses**

| Source/Category | Advisory Recommendations |
|---|---|
| Freeways and High-Traffic Roads | Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. |
| Distribution Centers | Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week).<br>Take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points. |
| Rail Yards | Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches. |
| Ports | Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or CARB on the status of pending analyses of health risks. |
| Refineries | Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation. |
| Chrome Platers | Avoid siting new sensitive land uses within 1,000 feet of a chrome plater. |
| Dry Cleaners Using Perchloroethylene | Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with three or more machines, consult with the local air district. Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations. |
| Gasoline Dispensing Facilities | Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities. |

Source: CARB 2005.

## *Environmental Justice Communities*

The South Coast AQMD region has the worst levels of ground-level ozone (smog) and among the highest levels of $PM_{2.5}$ in the nation. The air pollution levels in the region exceed both National and California AAQS for both these air pollutants. The health impacts associated with the high levels of air pollution cause respiratory and cardiovascular disease, exacerbate asthma, and can lead to premature death. EJ communities experience the brunt of the health effects from air pollution. In the 2022 AQMP, EJ communities are defined as census tracts in the top 25 percent in the California Office of Environmental Health Hazard Assessment's California Communities

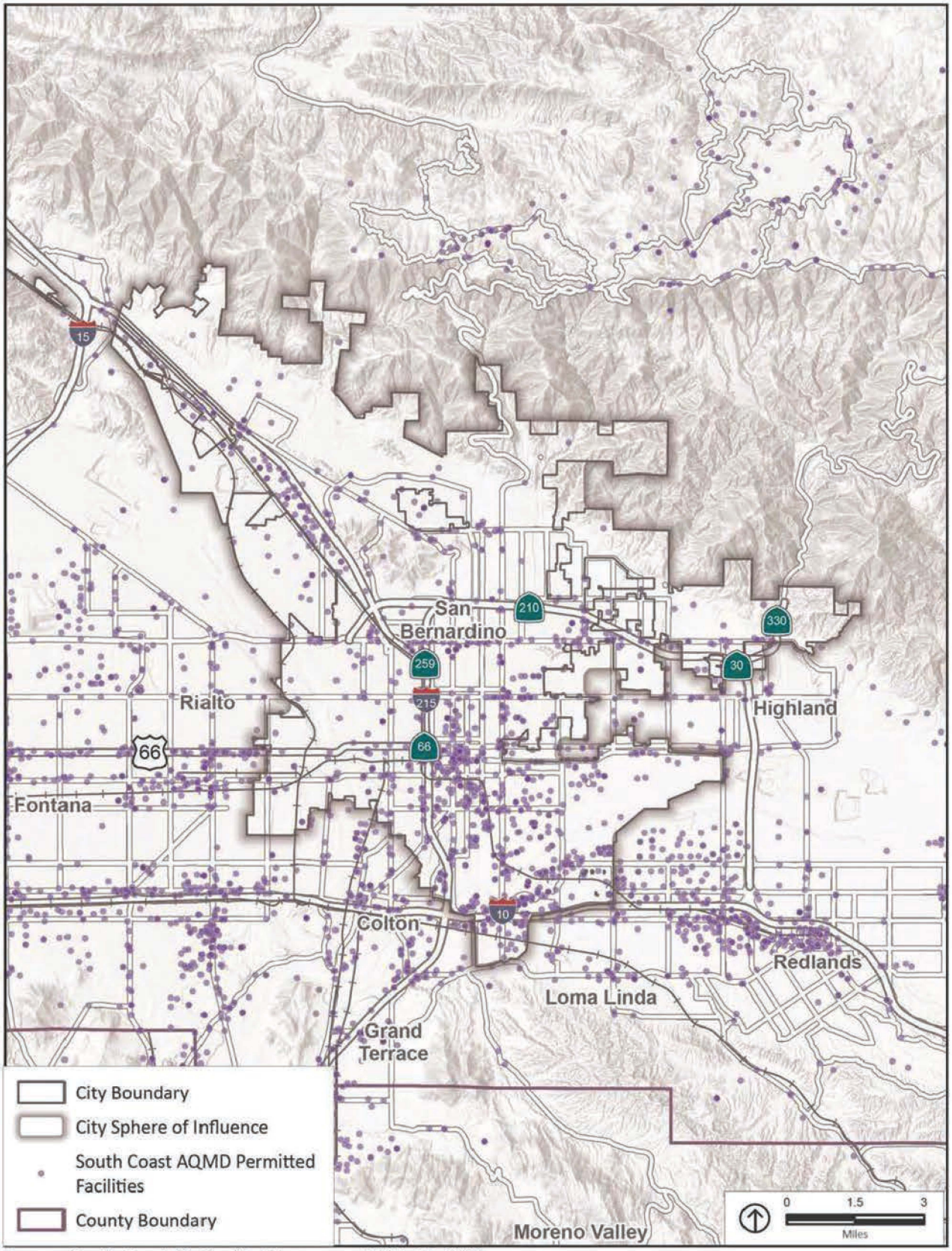
Environmental Health Screening Tool. Approximately 37 percent of the SoCAB residents live in EJ communities and approximately 80 percent of the census tracts in San Bernardino are disadvantaged (South Coast AQMD 2022; refer to Figure HEJ-1, *Disadvantaged Communities,* in the Health and Environmental Justice Element).

### *CalEnviroScreen Air Quality Indicators*

CalEnviroScreen (CES) is a mapping tool the helps identify the California communities that are most affected by sources of pollution and where people are especially vulnerable to pollution's effects. People in EJ areas identified by CES Version 4.0 (CES4) may be disproportionately affected by and vulnerable to poor air quality. CES's "pollution burden" map identifies communities that are exposed to pollution from human activities, such as air pollution (ozone, $PM_{2.5}$, DPM), water pollution (drinking water contaminants), hazardous materials (pesticide use, children's lead exposure, toxic releases), and traffic density.

Figure 3.3-3, *CES4 Indicator: Pollution Burden*, shows the pollution burden percentile for the County and plan area by census tract. The CES pollution burden scope considers the disproportionate effect of pollution on EJ communities because the score weighs socioeconomic factors (e.g., educational attainment, poverty) and sensitivity of the population (e.g., asthma rates, cardiovascular disease). Additionally, Figure 3.3-4, *CES4 Indicator: Diesel Particulate Matter*, shows the DPM percentile for County and plan area by census tract, and Figure 3.3-5, *CES4 Indicator: Ozone*, shows the ozone percentile for county and plan area by census tract.

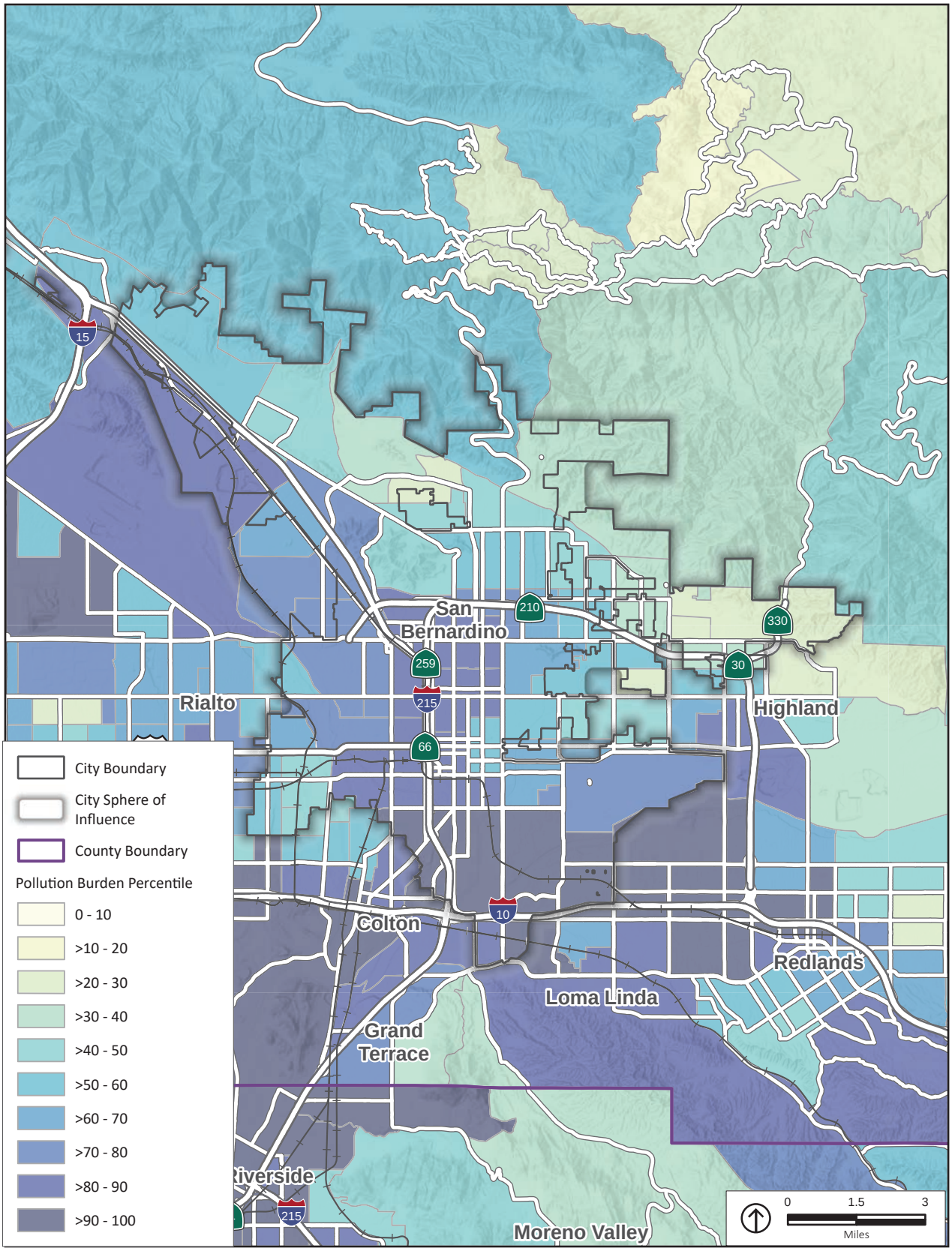
Lastly, though the causes of asthma are poorly understood, it is well established that exposure to traffic and outdoor air pollutants can trigger asthma attacks. Children, the elderly, and low-income Californians suffer disproportionately from asthma. Figure 3.3-6, *CES4 Indicator: Asthma*, shows the asthma percentile for county and plan area by census tract.




Source: South Coast Air Quality Management District, 2023.

Figure 3.3-2
**South Coast AQMD Permitted Facilities**

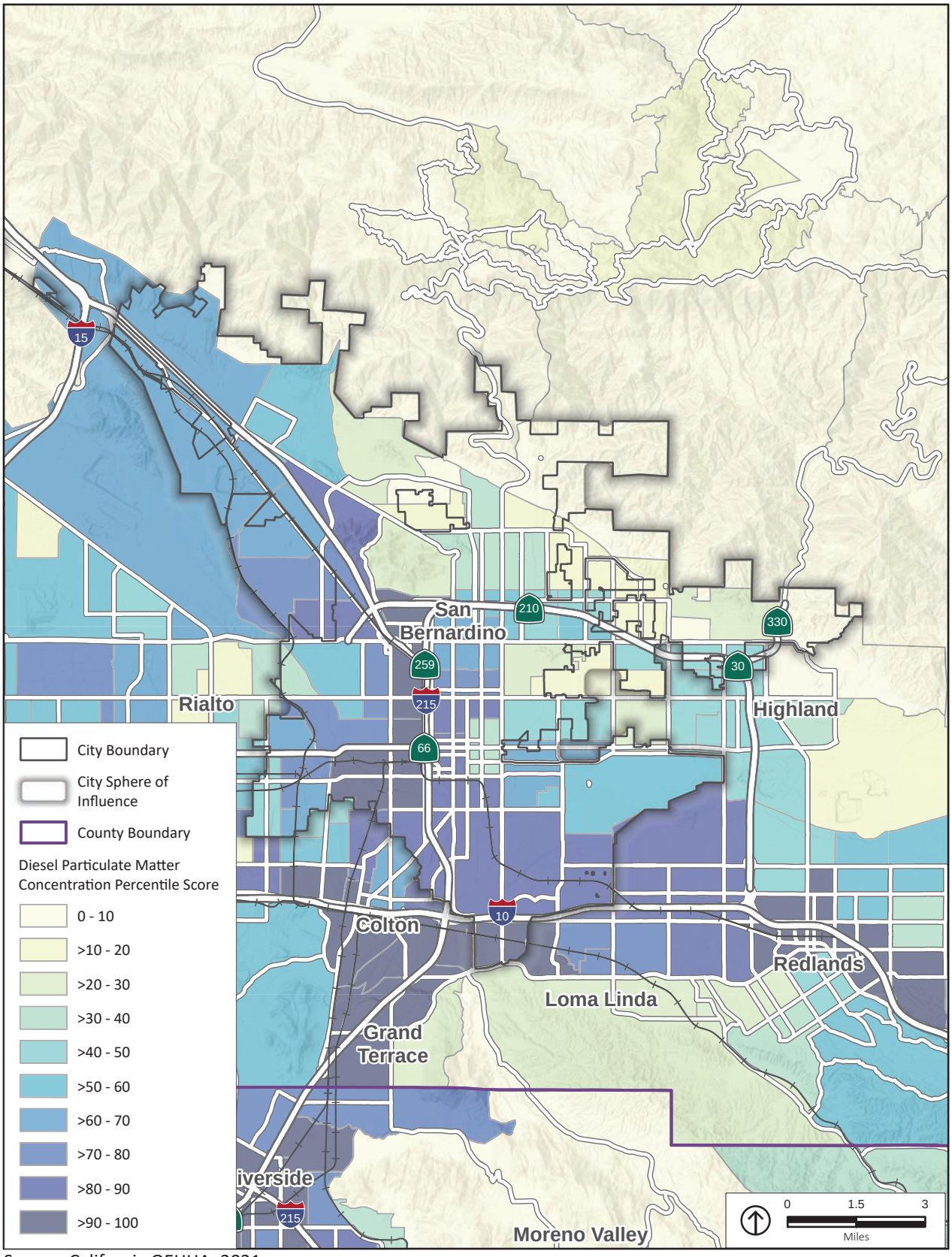
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Source: California OEHHA, 2021.

Figure 3.3-3
**CES4 Indicator – Pollution Burden**

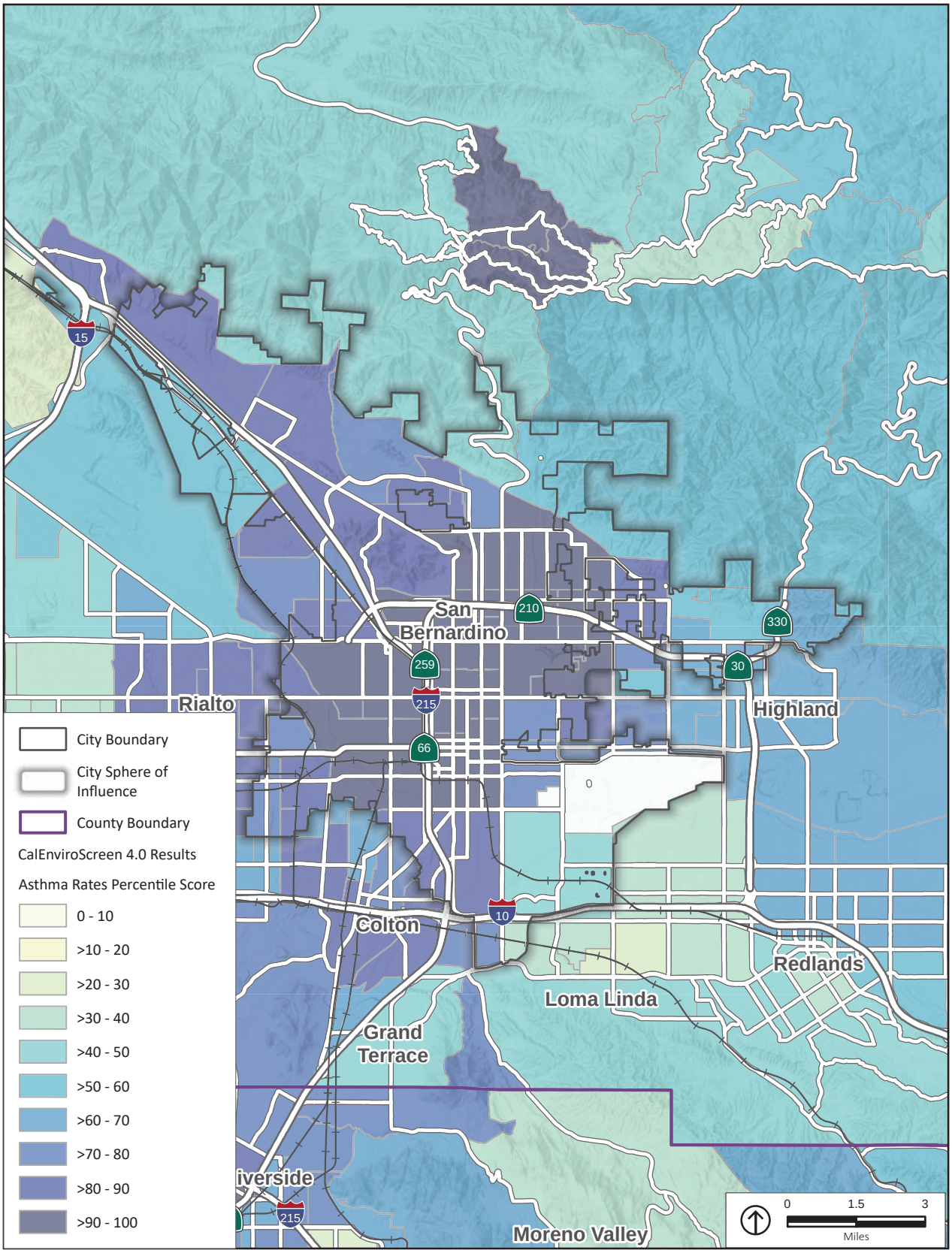
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Source: California OEHHA, 2021.

Figure 3.3-4
**CES4 Indicator – Diesel Particulate Matter**

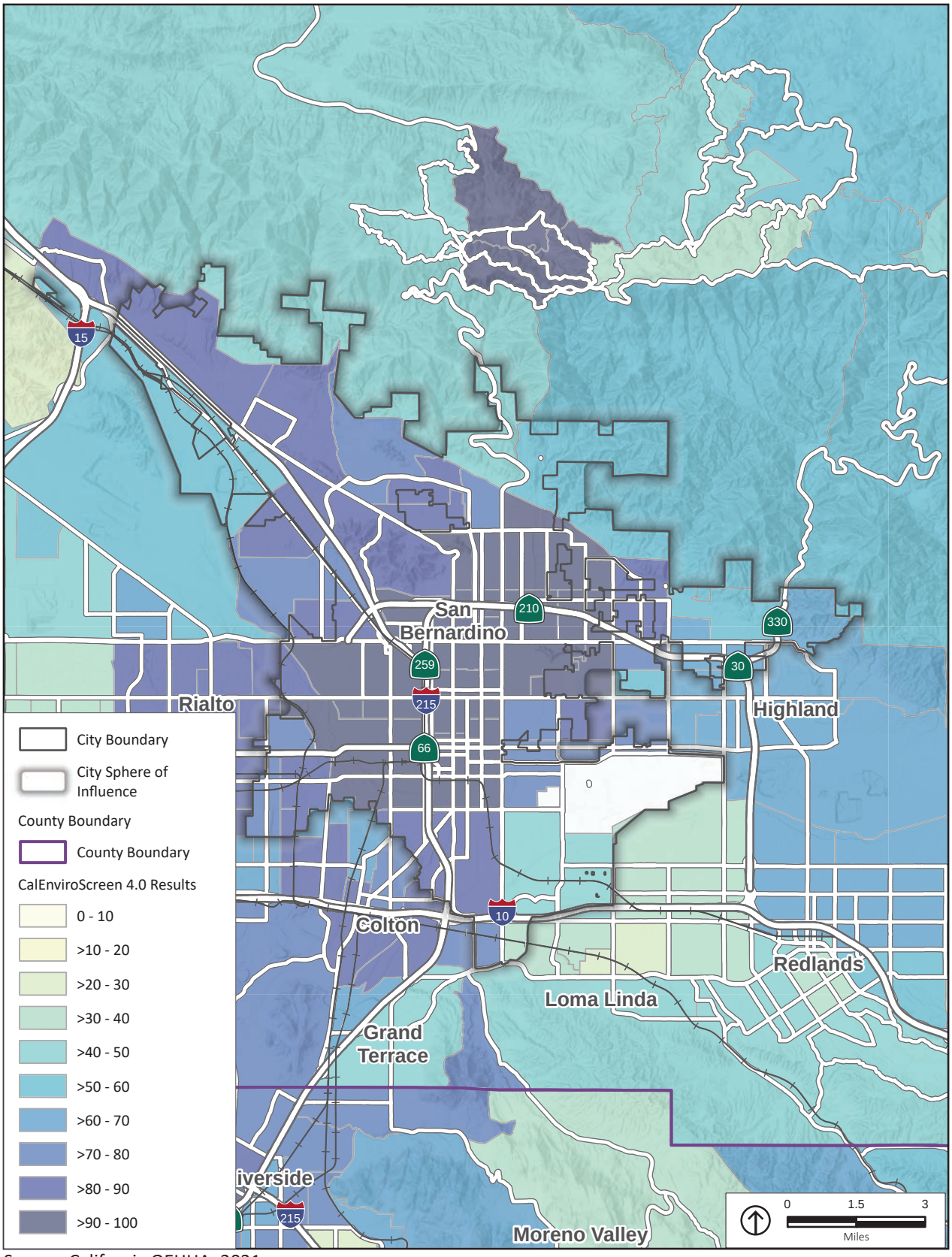
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Source: California OEHHA, 2021.

Figure 3.3-5
**CES4 Indicator – Ozone**

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Source: California OEHHA, 2021.

Figure 3.3-6
**CES4 Indicator – Asthma**

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## 3.3.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

**Appendix G, Environmental Checklist Form,** of the State CEQA Guidelines states that, "Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations." The issues in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the project would result in a significant air quality impact if it would:

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

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

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.

### SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT THRESHOLDS

#### Regional Significance Thresholds

CEQA allows the significance criteria established by the applicable air quality management district or air pollution control district to be used to assess impacts of a project on air quality. South Coast AQMD has established thresholds of significance for air quality for construction activities and project operation in the SoCAB, as shown in Table 3.3-7, *South Coast AQMD Regional Significance Thresholds*. Table 3.3-7 lists thresholds that are applicable for all projects uniformly, regardless of size or scope. As previously discussed, there is growing evidence that although ultrafine particulate matter contributes a very small portion of the overall atmospheric mass concentration, it represents a greater proportion of the health risk from PM exposure. However, because the USEPA and CARB have not adopted AAQS to regulate ultrafine particulate matter, South Coast AQMD has not developed thresholds for them.

**Table 3.3-7 South Coast AQMD Regional Significance Thresholds**

| Air Pollutant | Construction Phase | Operational Phase |
|---|---|---|
| Reactive Organic Gases (ROGs)/ Volatile Organic Compounds (VOCs) | 75 lbs./day | 55 lbs./day |
| Carbon Monoxide (CO) | 550 lbs./day | 550 lbs./day |
| Nitrogen Oxides ($NO_X$) | 100 lbs./day | 55 lbs./day |
| Sulfur Oxides ($SO_X$) | 150 lbs./day | 150 lbs./day |
| Particulates ($PM_{10}$) | 150 lbs./day | 150 lbs./day |

Source: South Coast AQMD 2023.

### *Health Outcomes Associated with the South Coast AQMD Regional Significance Thresholds*

Projects that exceed the South Coast AQMD's regional significance threshold contribute to the nonattainment designation of the SoCAB. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Exposure to fine particulate pollution and ozone causes myriad health impacts, particularly to the respiratory and cardiovascular systems:

- Increases cancer risk ($PM_{2.5}$, TACs)
- Aggravates respiratory disease ($O_3$, $PM_{2.5}$)
- Increases bronchitis ($O_3$, $PM_{2.5}$)
- Causes chest discomfort, throat irritation, and increased effort to take a deep breath ($O_3$)
- Reduces resistance to infections and increases fatigue ($O_3$)
- Reduces lung growth in children ($PM_{2.5}$)
- Contributes to heart disease and heart attacks ($PM_{2.5}$)
- Contributes to premature death ($O_3$, $PM_{2.5}$)
- Contributes to lower birth weight in newborns ($PM_{2.5}$) (South Coast AQMD 2015a)

Exposure to fine particulates and ozone aggravates asthma attacks and can amplify other lung ailments such as emphysema and chronic obstructive pulmonary disease. Exposure to current levels of $PM_{2.5}$ is responsible for an estimated 4,300 cardiopulmonary-related deaths per year in the SoCAB. In addition, University of Southern California scientists, in a landmark children's health study, found that lung growth improved as air pollution declined for children aged 11 to 15 in five communities in the SoCAB (South Coast AQMD 2015b).

South Coast AQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals exposed to elevated concentrations of air pollutants in the SoCAB and has established thresholds that would be protective of these individuals. To achieve the health-

based standards established by the EPA, South Coast AQMD prepares an AQMP that details regional programs to attain the AAQS. Mass emissions thresholds shown in Table 3.3-7 are not correlated with concentrations of air pollutants, but mass emissions still contribute to the cumulative air quality impacts in the SoCAB. The thresholds are based on the trigger levels for the federal New Source Review Program, which was created to ensure projects are consistent with attainment of health-based federal AAQS. Regional emissions from a single project do not trigger a regional health impact, and it is speculative to identify how many more individuals in the air basin would be affected by the health effects listed previously. Projects that do not exceed the South Coast AQMD regional significance thresholds in Table 3.3-7 would not violate regional air quality standards or contribute substantially to an existing or projected air quality violation.

If projects exceed the emission levels presented in Table 3.3-7, then those emissions would cumulatively contribute to the nonattainment status of the air basin and would contribute to elevating health effects associated with these criteria air pollutants regionally. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would contribute to reducing possible health effects related to criteria air pollutants. However, for projects that exceed the emissions in Table 3.3-7, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment because mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited previously.

South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health to address the issue raised in *Sierra Club v. County of Fresno* (Friant Ranch, L.P.) (2018) 6 Cal.5th 502, Case No. S21978. South Coast AQMD currently does not have methodologies that would provide the District with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions.[11] Ozone concentrations are dependent on a variety of

[11] In April 2019, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published an Interim Recommendation on implementing *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("Friant Ranch") in the review and analysis of proposed projects under CEQA in Sacramento County. Consistent with the expert opinions submitted to the court in Friant Ranch by the San Joaquin Valley Air Pollution Control District and South Coast AQMD, the SMAQMD guidance confirms the absence of an acceptable or reliable quantitative methodology that would correlate the expected criteria air pollutant emissions of projects to likely health consequences for people from project-generated criteria air pollutant emissions. The SMAQMD guidance explains that while it is in the process of developing a methodology to assess these impacts, lead agencies should follow the Friant Court's advice to explain in meaningful detail why this analysis is not yet feasible. Since this interim memorandum

complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, and the absence of modeling tools that could provide statistically valid data and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects, it is not possible to link specific health risks to the magnitude of emissions exceeding the significance thresholds. However, if a project in the SoCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SoCAB.

## Localized Significance Thresholds

### *Criterial Air Pollutants*

South Coast AQMD identifies localized significance thresholds (LST), shown in Table 3.3-8, *South Coast AQMD Localized Significance Thresholds*. Emissions of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS.

**Table 3.3-8 South Coast AQMD Localized Significance Thresholds**

| Air Pollutant (Relevant AAQS) | Concentration |
|---|---|
| 1-Hour CO Standard (CAAQS) | 20 ppm |
| 8-Hour CO Standard (CAAQS) | 9.0 ppm |
| 1-Hour $NO_2$ Standard (CAAQS) | 0.18 ppm |
| Annual $NO_2$ Standard (CAAQS) | 0.03 ppm |
| 24-Hour $PM_{10}$ Standard – Construction (South Coast AQMD)[1] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Construction (South Coast AQMD)[1] | 10.4 µg/m$^3$ |
| 24-Hour $PM_{10}$ Standard – Operation (South Coast AQMD)[1] | 2.5 µg/m$^3$ |
| 24-Hour $PM_{2.5}$ Standard – Operation (South Coast AQMD)[1] | 2.5 µg/m$^3$ |

SMAQMD has provided methodology to address health impacts. However, a similar analysis is not available for projects in the South Coast AQMD region.

**Table 3.3-8 South Coast AQMD Localized Significance Thresholds**

| Air Pollutant (Relevant AAQS) | Concentration |
|---|---|
| Annual Average $PM_{10}$ Standard (South Coast AQMD)[1] | 1.0 µg/$m^3$ |

Source: South Coast AQMD 2023.

ppm – parts per million; µg/m3 – micrograms per cubic meter

1. Threshold is based on South Coast AQMD Rule 403. Since the SoCAB is in nonattainment for PM10 and PM2.5, the threshold is established as an allowable change in concentration. Therefore, background concentration is irrelevant.

## *CO Hotspots*

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to the AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds. With the turnover of older vehicles and introduction of cleaner fuels, as well as implementation of control technology on industrial facilities, CO concentrations in the SoCAB and the state have steadily declined.

In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[12] As identified in South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide, peak carbon monoxide concentrations in the SoCAB in years before the 2007 redesignation were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact (Bay Area Air District 2023).[13]

[12] The four intersections were Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

[13] The CO hotspot analysis refers to the modeling conducted by the Bay Area Air District for its CEQA Guidelines because it is based on newer data and considers the improvement in mobile-source CO emissions. Although

### *Toxic Air Contaminants*

Whenever a project would require use of chemical compounds that have been identified in South Coast AQMD Rule 1401, placed on CARB's air toxics list pursuant to AB 1807, or placed on the EPA's National Emissions Standards for Hazardous Air Pollutants, a health risk assessment is required by the South Coast AQMD. Table 3.3-9, *South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds*, lists the TAC incremental risk thresholds for construction and operation of a project. The type of land uses that typically generate substantial quantities of criteria air pollutants and TACs from operations include industrial (stationary sources) and warehousing (truck idling) land uses (CARB 2005). Educational and recreational land uses do not use substantial quantities of TACs; thus, these thresholds are typically applied to new industrial projects' operations only. Additionally, the purpose of this environmental evaluation is to identify the significant effects of the project on the environment, not the significant effects of the environment on the project (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478)).

**Table 3.3-9 South Coast AQMD Toxic Air Contaminants Incremental Risk Thresholds**

| | |
|---|---|
| Maximum Incremental Cancer Risk (Project-Level) | ≥ 10 in 1 million |
| Cancer Burden (in areas ≥ 1 in 1 million) | > 0.5 excess cancer cases |
| Hazard Index (project increment) | ≥ 1.0 |

Source: South Coast AQMD 2023.

As stated previously, South Coast AQMD has identified that the initial thresholds in Table 3.3-9 should be adjusted if any of the following criteria apply:

- **Criteria #1, Post-2018 Projects with High Volume Diesel Fueled Trucks**. Post-2018 projects are not accounted for in MATES V. Therefore, if new warehousing projects along the truck route[14] have been constructed, the initial thresholds will be adjusted to the next, more stringent level (e.g., cumulative threshold will adjust from 10 in one million to 7 in one million).

meteorological conditions in the Bay Area differ from those in the Southern California region, the modeling conducted by BAAQMD demonstrates that the net increase in peak hour traffic volumes at an intersection in a single hour would need to be substantial. This finding is consistent with the CO hotspot analysis South Coast AQMD prepared as part of its 2003 AQMP to provide support in seeking CO attainment for the SoCAB. Based on the analysis prepared by South Coast AQMD, no CO hotspots were predicted for the SoCAB. As noted in the preceding footnote, the analysis included some of Los Angeles' busiest intersections, with daily traffic volumes of 100,000 or more peak hour vehicle trips operating at LOS E and F (South Coast AQMD 2003).

[14] Truck route is from the project site to major freeway, within certain distance to sensitive receptors, add all diesel-fueled trucks from post-2018 projects.

- **Criteria #2, Health Sensitive Population**. If the project site is within an SB 535 or AB 617 community, the initial thresholds will be adjusted to the next, more stringent level (e.g., cumulative threshold will adjust from 7 in one million to 5 in one million).

## METHODOLOGY

The air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project. The published South Coast AQMD's *CEQA Air Quality Handbook* and its updates on the South Coast AQMD website are intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. It provides standards, methodologies, and procedures for conducting air quality analyses in EIRs that were used in this analysis. Following is a summary by sector of the assumptions used for the plan area's criteria air pollutant emissions inventory and forecast included in Appendix C.

- **Building Energy.** Emissions associated with natural gas use for residential and nonresidential land uses in the plan area were modeled based on data provided by the Southern California Gas Company (SoCalGas) for years 2020 through 2024. Existing natural gas emissions are based on the four-year average (2022–2025) to account for fluctuations in energy use.[15] Forecasts are adjusted for increases in dwelling units for residential natural gas use and non-residential square footage for non-residential natural gas use in the plan area.
- **Transportation.** Transportation emissions forecasts were modeled using emissions data from CARB's EMFAC2021 V1.0.2 web database. Model runs were based on daily vehicle miles traveled (VMT) data provided by KOA (see Appendix I-1) and calendar year 2025 (existing) and 2050 emission rates. The VMT is based on the origin-destination method using the San Bernardino Transportation Analysis Model+ (SBTAM+) and includes the full trip length for land uses in the city and a 50 percent reduction in the trip length for external-internal/internal-external trips based on the recommendations of CARB's Regional Targets Advisory Committee under SB 375. Consistent with CARB's methodology within the Climate Change Scoping Plan Measure Documentation Supplement, daily VMT was multiplied by 347 days per year to account for reduced traffic on weekends and holidays to determine annual emissions.
- **Off-Road Equipment.** OFFROAD is a database of equipment use and associated emissions for each county compiled by CARB. Off-road equipment in the plan area is based on year 2025 (existing) and 2050 (forecasted) emission rates for San Bernardino County obtained from CARB's Off-Road Web Query V.1.1.2 web database. OFFROAD was used to estimate criteria air pollutant emissions from lawn and garden, light commercial, and construction equipment in the County and plan area. In order to determine the percentage of emissions

[15] The 2025 natural gas usage value was interpolated based on previous usage for years 2020 to 2024.

attributable to the plan area, light commercial equipment is estimated based on employment for the plan area as a percentage of San Bernardino County and forecast based on the change in employment in the plan area. Construction equipment use is estimated based on building permit data for the plan area and San Bernardino County from data compiled by the US Census and assumes that construction emissions for the forecast year would be similar to historical levels. Lawn and garden equipment is based on the percentage of housing units in plan area compared to San Bernardino County and forecast based on the change in housing growth in the plan area.

- **Area Sources.** Area sources are based on the emission factors from the latest CalEEMod Users Guide for emissions generated from use of consumer products (e.g., cosmetics, detergents, personal care products, cleaning supplies).

## Impacts of the Environment on a Project

In 2016, the California Legislature passed Senate Bill 1000 (SB 1000), Planning for Healthy Communities Act, to incorporate Environmental Justice (EJ) into the local land use planning process. SB 1000 requires local governments to address pollution and other hazards that disproportionately impact low-income communities and communities of color in their jurisdictions. SB 1000 mandates that general plans address environmental justice but does not require CEQA analyses to address EJ issues. This EIR addresses air quality and health risk impacts of implementing the proposed project to sensitive land uses.

Buildout of the proposed land use plan associated with the proposed General Plan Update would site sensitive uses (e.g., residential) near sources of emissions (e.g., freeways, industrial uses, etc.). Developing new sensitive land uses near sources of emissions could expose persons that inhabit these sensitive land uses to potential air quality-related impacts. However, the purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project. *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 (Case No. S213478). Thus, CEQA does not require analysis of the potential environmental effects from siting sensitive receptors near existing sources, and this type of analysis is not provided in Section 3.3.4.

However, the proposed General Plan Update includes Policy OSC-7.4, Sensitive Receptors, and Policy HEJ-5.1, Sensitive Land Use Adjacent to Sources of Pollution, which require that development of new sensitive land uses include buffers or design features to minimize air quality impacts. In addition, the General Plan Update includes policies to minimize air pollutant emissions impacts on existing and future sensitive receptors for both new nonresidential and residential development (see Table 3.3-10, *Air Quality Compatibility and EJ: Proposed General Plan Update Policies*).

### Table 3.3-10 Air Quality Compatibility and EJ: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-5.5* | **Environmental land uses.** Require technical studies when reviewing new developments to ensure that they do not impose unacceptable levels of noise, air pollution, traffic, dust, vibration, odors, or other detrimental impacts on nearby sensitive land uses. |
| LU-5.6 | **Reducing impacts from existing incompatible uses.** Where existing land uses that have been approved and built adversely impact adjacent sensitive uses, work with affected parties to seek funding and develop creative ways to reduce negative impacts on sensitive land uses. |
| LU-11.5 | **Compatibility with adjoining uses.** Ensure that all industrial facilities near sensitive receptors incorporate screening, landscaping, and enclosure provisions necessary to prevent exposure to odor, noise, dust, smoke, gas, fumes, cinders, or refuse matter. |
| LU-12.2 | **Integrate infrastructure with community setting.** Sensitively integrate regional and local-supporting infrastructure into San Bernardino's neighborhoods, commercial and industrial districts, and corridors. |
| **Circulation and Mobility Element** | |
| CM-5.1 | **Sensitive areas.** Where feasible, avoid truck routes on roadways that are adjacent to residential areas and other land uses that serve sensitive populations, such as schools, daycares, and medical facilities. |
| **Open Space and Conservation Element** | |
| OSC-7.2* | **Environmental review.** Require applications for proposed projects to include an evaluation of potential air quality impacts consistent with the AQMD's "Air Quality Analysis Guidance Handbook." This includes:<br>▪ Identification of criteria and toxic pollutants<br>▪ Analysis of construction and operational impacts<br>▪ Analysis of cumulative impacts<br>▪ Feasible mitigation measures to reduce impacts |
| OSC-7.3* | **Industrial uses.** Support the implementation and enforcement of SCAQMD rules requiring existing warehouse projects and railroads comply with applicable rules and laws, including but not limited to:<br>▪ Support Rule 2305 to reduce emissions of particulate and nitrogen oxides from qualified warehouses.<br>▪ Ensure that qualified projects meet operational and design standards for 21st-century warehouses.<br>▪ Support Rule 2306 to reduce diesel particulate and nitrogen oxide emissions from railyards. |
| OSC-7.4* | **Sensitive receptors.** Require development projects to minimize exposure of new sensitive receptors (e.g., hospitals, schools, daycare facilities, elderly housing) to odors, criteria pollutants, and toxic contaminants. Consider and, where feasible, pursue |

### Table 3.3-10 Air Quality Compatibility and EJ: Proposed General Plan Update Policies

| | |
|---|---|
| | opportunities to separate, buffer, and protect existing sensitive receptors from sources of pollution to the greatest extent possible. |
| OSC-7.5 | **Disadvantaged areas.** Support clean air strategies that reduce the level of air pollution within the San Bernardino–Muscoy area or other areas of the community near major pollution sources. |
| OSC-7.7 | **Indirect sources.** Support California and federal regulations that aim to reduce and control air pollution from indirect sources. This includes support for:<br>▪ Reducing emissions from warehouse operations.<br>▪ Reducing emissions from railyard operations.<br>▪ Reducing GHG emissions from power plants.<br>▪ Reducing emission levels from local airports. |
| OSC-7.10* | **Trucking emissions.** Enforce regulations to reduce the level of pollution and particulate matter emitted in San Bernardino. This includes:<br>▪ Restricting idling for heavy duty trucks.<br>▪ Siting fuel stations for low emission trucks.<br>▪ Enforcing compliance with adopted truck routes.<br>▪ Exploring incentives for zero emission vehicles. |
| **Health and Environmental Justice Element** | |
| HEJ-5.1 | **Sensitive land use adjacent to sources of pollution.** Discourage the development of sensitive land uses (e.g., schools, playgrounds, housing, health-care facilities, and elder and childcare centers) within 500 feet of sources of air pollution. Sources of air pollution include but are not limited to freeways, railyards, mining, and industrial uses with manufacturing, dust emissions, or high truck traffic. |
| HEJ-5.2 | **Railyard air pollution.** Support the reduction of pollution exposure and adverse health impacts from the railyards. Work with BNSF to reduce the level of on-site pollution generated from mechanical equipment and switcher locomotives; monitor air pollution emanating from the yard as a result of expanded rail volume. |
| HEJ-5.3* | **Trucking routes.** Develop, maintain, and amend as needed a comprehensive system of local truck routes that meets the needs of the City's logistics economy while protecting residential and sensitive land uses from the air pollution emissions from trucks. Require logistics uses to mitigate impacts to the extent feasible. |
| HEJ-5.4 | **Air quality monitoring.** Work with the AB617 working group and other agencies to track air pollution, both stationary and mobile, to evaluate air quality and track air emissions such as particulate matter (PM), black carbon, fugitive dust, and other key pollutants. |
| HEJ-5.5* | **Pollution impacts.** Require new or substantially expanded industrial and manufacturing uses to conduct an analysis of impacts from pollution emissions. Require implementation of pollutant mitigation measures determined to be feasible at the time of project approval. |

**Table 3.3-10 Air Quality Compatibility and EJ: Proposed General Plan Update Policies**

| | |
|---|---|
| HEJ-5.9* | **Health risk assessments.** As allowed by CEQA and state law, require that new qualifying projects prepare a cumulative health risk assessment to determine whether construction or operational impacts exceed established risk thresholds; require that developers demonstrate mitigation of impacts prior to the approval of the project. |

* Denotes mitigating policies

## 3.3.4 Project Impact Analysis

### a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

#### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The South Coast AQMD is directly responsible for reducing emissions from area, stationary, and mobile sources in the SoCAB to achieve the National and California AAQS and has responded to this requirement by preparing an AQMP. The South Coast AQMD Governing Board adopted the 2022 AQMP, which is a regional and multiagency effort (South Coast AQMD, CARB, SCAG, and EPA).

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the AQMP.

The two principal criteria for conformance with an AQMP are:

1. Whether the project would exceed the assumptions in the AQMP.
2. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards.

SCAG is South Coast AQMD's partner in the preparation of the AQMP, providing the latest economic and demographic forecasts and developing transportation measures. Regional population, housing, and employment projects developed by SCAG are based, in part, on general plan land use designations. These projections form the foundation for the emissions inventory of the AQMP.

## Criterion 1

Table 3.3-11, *Comparison of Population and Employment Forecast*, compares the population and employment growth forecast under the existing General Plan and the General Plan Update to the existing conditions. The table shows that both the existing General Plan and the General Plan Update would result in a decrease in VMT per service population compared to existing conditions. This indicates that these plans would promote more efficient land use, reducing VMT per resident and employee. Additionally, buildout of the General Plan Update would improve the City's jobs-housing ratio. As described under Section 3.14, *Population and Housing*, the anticipated growth in the city would be subject to the proposed Land Use Plan and other growth-related policies under the General Plan's Housing and Land Use Elements would ensure that the city supports a variety of housing types and job growth to accommodate residents. Since the General Plan Update would lead to a decrease in VMT per service population compared to existing conditions, implementation of the General Plan Update would be consistent with the AQMP under the first criterion.

**Table 3.3-11 Comparison of Population and Employment Forecast**

| Category | Existing | Existing General Plan | General Plan Update | DTSP |
|---|---|---|---|---|
| Population | 267,267 | 298,300 | 330,892 | 40,912 |
| Employment | 111,690 | 144,913 | 172,190 | 21,839 |
| Service Population (SP)[1] | 378,957 | 443,213 | 503,082 | 62,751 |
| Daily VMT[2] | 7,892,116 | 8,358,721 | 9,487,287 | 2,072,594 |
| VMT/SP | 20.83 | 18.86 | 18.86 | 33.03 |

1. Service population (SP) consists of the aggregate of total employees and population within the plan area.
2. Daily VMT provided by KOA, 2022, 2025 (Appendix I-1 and I-3).

## Criterion 2

The SoCAB is designated nonattainment for $O_3$ and $PM_{2.5}$ under the California and National AAQS,[16] nonattainment for $PM_{10}$ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2025a). As identified in Air Quality Impact Discussion 'b', the General Plan Update would result in a substantial increase in VOC, $NO_x$, $PM_{10}$, and $PM_{2.5}$ compared to existing conditions. Consequently, emissions generated by development

[16] The SoCAB is pending a redesignation request from nonattainment to attainment for the 24-hour federal $PM_{2.5}$ standards. The 2021 $PM_{2.5}$ Redesignation Request and Maintenance Plan demonstrates that the South Coast meets the requirements of the CAA to allow the USEPA to redesignate the SoCAB to attainment for the 65 µg/m$^3$ and 35 µg/m$^3$ 24-hour $PM_{2.5}$ standards. CARB will submit the 2021 $PM_{2.5}$ Redesignation Request to the USEPA as a revision to the California SIP (CARB 2021).

projects in addition to existing sources in the General Plan Update Area are considered to cumulatively contribute to the nonattainment designations of the SoCAB. Buildout of the General Plan Update could contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout would result in a significant air quality impact. Therefore, implementation of the General Plan Update would not be consistent with the AQMP under the second criterion.

## Muscoy-Community Emissions Reduction Plan

In 2018, South Coast AQMD and CARB designated the San Bernardino, Muscoy community as an AB 617 community, which mandates community-driven air pollution reduction plans in the State's most impacted communities (CARB 2025d). The "Community Emissions Reduction Plan: San Bernardino, Muscoy" helps reduce exposure of sensitive receptors in Muscoy to DPM and $NO_X$ from sources such as neighborhood truck traffic; warehouses; the OmniTrans bus yard; railyards; and concrete batch, asphalt, and aggregate plants (South Coast AQMD 2019). As listed in Table 3.3-10, the General Plan Update contains various policies to help reduce impacts on EJ communities. Multiple LUD policies would ensure development to be compatible with surrounding land uses to reduce environmental effects on sensitive receptors. Policy OSC-7.5 would support clean air strategies to further reduce the level of air pollution within the region, especially in disadvantaged areas. Policy HEJ-5.1 discourages the development of sensitive land uses within major sources of air pollution, and Policy HEJ-5.9 requires new qualifying projects to prepare a cumulative health risk assessment. Policy OSC-7.4 would require new development projects to minimize exposure of new sensitive receptors to criteria air pollutants and toxic air contaminants to the greatest extent possible. Therefore, the General Plan Update is consistent with the strategies in the Community Emissions Reduction Plan for the Muscoy community.

## Summary

Buildout of the General Plan Update would decrease VMT per service population. However, air pollutant emissions associated with buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the SoCAB. Therefore, the General Plan Update would be inconsistent with the AQMP, and this impact is **potentially significant**.

**Impact AIR-1a: Buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.**

**Mitigation Measures:** Implement Mitigation Measures AIR-1 and AIR-2.

**Significance with Mitigation:** Significant and unavoidable. The General Plan Update would be inconsistent with the South Coast AQMD's AQMP because the General Plan Update would cumulatively contribute to the nonattainment designations of the SoCAB. Incorporation of Mitigation Measures AIR-1 (construction) and AIR-2c (operation) into future development

projects for the construction and operation phases would reduce criteria air pollutant emissions associated with buildout of the General Plan Update. Additionally, policies in the General Plan Update listed in Table 3.3-13 would further help reduce long-term emissions to the extent feasible.

However, because of the magnitude and intensity of development accommodated by the General Plan Update as well as regional air quality influences beyond the control of the City, impacts associated with consistency with the AQMP would remain **significant and unavoidable**. No additional feasible mitigation measures or mitigating policies at the program level would ensure consistency of the General Plan Update with the South Coast AQMD's AQMP. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.

## DOWNTOWN SPECIFIC PLAN

The DTSP is a specific plan for the City's downtown area, which is in the center of the area covered by the General Plan Update. The DTSP would allow for growth of 35,618 people and 10,989 jobs in the DTSP Area (refer to Table 3.4-11, *Buildout Comparison of Existing Conditions to the Downtown Specific Plan)*. As further discussed in Chapter 3.14, *Population and Housing*, population and job growth in the DTSP Area would exceed SCAG's 2050 projections. However, the DTSP would accommodate a significant increase in housing capacity within the DTSP Area by allowing for more mixed-use and residential land uses in underutilized areas. Under the DTSP, the DTSP Area would continue to be jobs rich and result in a more balanced distribution of housing and employment. Since the population and employment growth associated with the DTSP are accounted for in the General Plan Update, implementation of the DTSP would be consistent with the AQMP under the first criterion.

Similarly, because the DTSP Area was included in the cumulative emissions analysis for the General Plan Update, development within the DTSP Area would also exceed South Coast AQMD regional and localized thresholds and would cumulatively contribute to the existing nonattainment designations in the SoCAB. As a result, the DTSP would be inconsistent with the AQMP under the second criterion, and this impact is **potentially significant**.

**Impact AIR-1b: Buildout of the Downtown Specific Plan would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.**

**Mitigation Measures:** Implement Mitigation Measures AIR-1 and AIR-2.

**Significance with Mitigation:** Significant and unavoidable. Development within the DTSP Area would also cumulatively contribute to the nonattainment designations of the SoCAB. Incorporation of Mitigation Measures AIR-1 (construction) and AIR-2c (operation) into future development projects for the construction and operation phase would reduce criteria air

pollutant emissions associated with buildout of the DTSP area. Additionally, policies in the General Plan Update listed in Table 3.3-13, *Air Quality: Proposed General Plan Update Policies*, would further help reduce long-term emissions to the extent feasible.

However, because of the magnitude and intensity of development accommodated by the DTSP, as well as regional air quality influences beyond the control of the City, impacts associated with consistency with the AQMP would remain **significant and unavoidable**. No additional feasible mitigation measures or mitigating policies at the program level would ensure consistency of the DTSP with the South Coast AQMD's AQMP. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent individual projects that meet applicable project-level thresholds of significance.

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

## CONSTRUCTION

### General Plan and Development Code Update

Construction activities under the General Plan Update would also temporarily increase $PM_{10}$, $PM_{2.5}$, VOC, $NO_X$, $SO_X$, and CO regional emissions in the SoCAB. The primary source of $NO_X$, CO, and $SO_X$ emissions is the operation of construction equipment. The primary sources of particulate matter ($PM_{10}$ and $PM_{2.5}$) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary sources of VOC emissions are the application of architectural coating and off-gas emissions associated with asphalt paving.

Construction activities associated with the General Plan Update would occur over the buildout horizon of the plan, causing short-term emissions of criteria air pollutants. However, information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of the General Plan Update, the projects cumulative emissions would likely exceed the South Coast AQMD regional significance thresholds. In accordance with the South Coast AQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SoCAB.

Air quality emissions related to construction must be addressed on a project-by-project basis. For the General Plan Update, which is a broad-based policy plan, it is not possible to determine whether the scale and phasing of individual projects would exceed the South Coast AQMD's short-term regional or localized construction emissions thresholds. In addition to regulatory

measures—e.g., South Coast AQMD Rule 403 for fugitive dust control, Rule 1113 for architectural coatings, and CARB's Airborne Toxic Control Measures—mitigation imposed at the project level may include extension of construction schedules and/or use of special equipment.

While individual projects under the General Plan Update may not exceed the South Coast AQMD regional significance thresholds, the likely scale and extent of the combined construction activities associated with the future development under the General Plan Update would likely exceed the relevant South Coast AQMD thresholds. Overall, construction-related regional air quality impacts of developments that would be accommodated by the General Plan Update would be **potentially significant**.

**Impact AIR-2a: Short-term emissions from buildout of the General Plan Update could exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.**

**Mitigation Measure AIR-1:** Prior to discretionary approval by the City of San Bernardino for development projects subject to CEQA (California Environmental Quality Act) review (*i.e.*, nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with the South Coast Air Quality Management District (South Coast AQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the South Coast AQMD–adopted thresholds of significance, the City of San Bernardino Building & Safety Division shall require feasible mitigation measures to reduce air quality emissions. Potential measures shall be incorporated as conditions of approval for a project and may include but are not limited to the following:

- Require fugitive dust control measures that exceed South Coast Air Quality Management District's Rule 403, such as:
  - Requiring use of nontoxic soil stabilizers to reduce wind erosion.
  - Applying water every four hours to active soil disturbing activities.
  - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 4 interim or higher exhaust emission limits.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.

- Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the South Coast Air Quality Management District's website at: https://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings.

These identified measures shall be incorporated into all appropriate construction documents (*e.g.*, construction management plans) submitted to the City and shall be verified by the City's Planning Department.

**Significance with Mitigation:** Significant and unavoidable. Buildout in accordance with the General Plan Update could generate short-term emissions that cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measure AIR-1 and the policies of the General Plan Update would reduce construction-related air pollutant emissions to the extent feasible. However, individual projects accommodated under the General Plan Update may exceed the South Coast AQMD regional significance thresholds. Therefore, construction-related impacts of the General Plan Update would be **significant and unavoidable**.

## Downtown Specific Plan

Though individual projects under the DTSP may not exceed the South Coast AQMD regional significance thresholds, the likely scale and extent of the combined construction activities associated with the future development under the DTSP would likely exceed the relevant South Coast AQMD thresholds. Overall, construction-related regional air quality impacts of developments that would be accommodated by the DTSP would be **potentially significant**.

**Impact AIR-2b: Short-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.**

**Mitigation Measures:** Implement Mitigation Measure AIR-1.

**Significance with Mitigation:** Significant and unavoidable. Mitigation Measure AIR-1 and the policies of the General Plan Update would reduce construction-related air pollutant emissions to the extent feasible. However, individual projects accommodated under the DTSP may exceed the South Coast AQMD regional significance thresholds. Therefore, construction-related impacts of the DTSP would be **significant and unavoidable**.

## OPERATION

### General Plan and Development Code Update

The General Plan Update guides growth and development in the General Plan Update Area by designating allowed land uses by parcel and through implementation of its goals and policies. New development would increase air pollutant emissions in the General Plan Update Area and contribute to the overall emissions in the SoCAB. The General Plan Update sets up the framework for growth and development, but does not directly result in development. Before development can occur, it must be analyzed for conformance with the general plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

#### *Criteria Air Pollutant Emissions Forecast*

The emissions forecast for the General Plan Update Area is shown in Table 3.3-12, *City of San Bernardino Regional Criteria Air Pollutant Emissions Forecast*. Buildout of the General Plan Update would continue to result in an increase in long-term emissions that exceed the daily South Coast AQMD thresholds for VOC, $NO_X$, and $PM_{2.5}$.

**Table 3.3-12 City of San Bernardino Regional Criteria Air Pollutant Emissions Forecast**

| Scenario | Criteria Air Pollutant Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_2$ | $PM_{10}$ | $PM_{2.5}$ |
| **Existing – 2050 Emission Rates** | | | | | | |
| Transportation | 96 | 1,575 | 8,089 | 50 | 485 | 174 |
| Energy | 54 | 953 | 585 | 6 | 75 | 75 |
| Area - Offroad Equipment | 738 | 551 | 19,727 | 1 | 17 | 13 |
| Area - Consumer Products | 2,697 | — | — | — | — | — |
| **Existing Total** | 3,585 | 3,078 | 28,401 | 58 | 578 | 261 |
| **General Plan Update** | | | | | | |
| Transportation | 116 | 1,893 | 9,724 | 60 | 583 | 209 |
| Energy | 78 | 1,368 | 835 | 8 | 108 | 108 |
| Area - Offroad Equipment | 340 | 622 | 15,168 | 1 | 14 | 8 |
| Area - Consumer Products | 4,352 | — | — | — | — | — |
| **General Plan Update Total** | 4,885 | 3,884 | 25,727 | 70 | 705 | 324 |
| **Change** | | | | | | |
| Transportation | 19 | 318 | 1,635 | 10 | 98 | 35 |
| Energy | 24 | 415 | 250 | 3 | 33 | 33 |
| Area - Offroad Equipment | -398 | 72 | -4,558 | 0 | -3 | -5 |

**Table 3.3-12 City of San Bernardino Regional Criteria Air Pollutant Emissions Forecast**

| Scenario | Criteria Air Pollutant Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area - Consumer Products | 1,655 | — | — | — | — | — |
| **Total** | **1,300** | **805** | **-2,674** | **13** | **127** | **63** |
| South Coast AQMD Regional Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Significant? | **Yes** | **Yes** | No | No | No | **Yes** |

Source: Appendix C.

The increase in VOC emissions compared to the existing land uses is a result of the increase in residential uses, which results in an increase in consumer product use in the plan area. Emissions of VOC that exceed the South Coast AQMD regional significance thresholds would contribute to the $O_3$ nonattainment designation of the SoCAB. The increase in $NO_X$ emissions is a result of higher emissions from mobile sources and energy production within the plan area. $NO_X$ is a precursor to the formation of ozone ($O_3$) as well as particulate matter ($PM_{2.5}$). The increase in $PM_{2.5}$ emissions compared to the existing land uses is a result from higher emissions from mobile sources and energy production in the plan area. Consequently, the criteria air pollutant emissions that exceed South Coast AQMD's regional significance thresholds would cumulatively contribute to the $O_3$ and particulate matter ($PM_{2.5}$) nonattainment designations of the SoCAB.

As listed in Table 3.3-13, *Air Quality: Proposed General Plan Update Policies*, the General Plan Update includes policies that would contribute to reducing operational emissions associated with development projects. The Land Use and Urban Form Element and Circulation and Mobility Element policies would help reduce GHG emissions from buildings and transportation measures to provide air quality co-benefits. The Open Space and Conservation Element policies would require an evaluation of potential air quality impacts consistent with the South Coast AQMD's "Air Quality Analysis Guidance Handbook" and enforce California and federal regulations to help control air pollution from indirect sources. The Health and Environmental Justice Element policy would help promote other agencies to track air pollution from both stationary and mobile sources.

### Table 3.3-13 Air Quality: Proposed General Plan Update Policies

| Land Use and Urban Form Element | |
|---|---|
| LU-3.3* | **Building designs and sites near freeways and rail.** Require physical design elements in new construction and rehabilitation of buildings to protect the public from the adverse effects of vehicle-generated air emissions, noise, and vibration from freeways and rail. |
| LU-6.1 | **Urban form to reduce GHG emissions**. Promote residential, commercial, and industrial development within urbanizing areas that is compact, pedestrian friendly, and served by transportation options along major corridors and in key activity areas. |
| LU-6.4 | **Measures to reduce GHG emissions from buildings.** Encourage incorporation of measures to reduce or eliminate preventable GHG emissions in new projects exceeding 100,000 square feet of gross floor area. Measures may include, but are not limited to:<br>▪ Reducing on-site energy consumption.<br>▪ Increasing on-site energy generation and storage.<br>▪ Supporting renewable energy projects in the city.<br>▪ Reducing vehicle trips and waste generation. |
| LU-6.5 | **Transportation measures to reduce GHG emissions.** Implement multi-modal transportation improvements, transportation demand management programs, and encourage use of mass transit, car-pooling, ridesharing, and telecommuting in accordance with policy and program guidance in the Circulation Element. |
| LU-6.7* | **Heat island mitigation**. Require private development to incorporate measures that are intended to materially reduce the heat island effect and promote climate resiliency through measures such as:<br>▪ Planting trees and landscaping.<br>▪ Installing green or cool roofs.<br>▪ Increased tree canopy in parking lots.<br>▪ Cooler permeable pavements.<br>▪ Orienting buildings for passive cooling. |
| LU-6.8 | **Plant and maintain an urban forest.** Significantly increase the City's urban forest for its aesthetic, heat mitigation, and air quality benefits, including, but not limited to the following measures:<br>▪ Require new development to plant street trees on site and along the adjacent roadway.<br>▪ Seek to use creative strategies to preserve and nurture mature trees in existing development.<br>▪ Prioritize, to the extent possible, tree species that maximize air quality and shade benefits. |

**Table 3.3-13 Air Quality: Proposed General Plan Update Policies**

| | |
|---|---|
| LU-6.9 | **Alternative energy generation sources.** Promote and facilitate technologies that reduce the burning of fossil fuels and their deleterious impact on the environment. Examples include, but are not limited to:<br>▪ Alternative (non-fossil fuel) fueling stations and power sources for autos and trucks.<br>▪ Alternative energy sources, including hydroelectricity, solar, and wind to the extent feasible.<br>▪ Emergent zero emission technology for trains and mass transit alternatives**.** |
| LUD-9.8* | **Compatible uses near homes and in neighborhoods.** Require new development with potentially adverse impacts on neighborhoods or residents, such as noise, traffic, emissions, and stormwater runoff, be located and designed so that quality of life and safety are preserved. |
| LU-11.4* | **Manage industrial use impacts.** Monitor and ensure that industrial land uses operate in a safe and healthful manner through full compliance with permits for the use, storage, production, or transporting of toxic or hazardous materials, waste byproducts, or emissions. |
| LU-11.5 | **Compatibility with adjoining uses.** Ensure that all industrial facilities near sensitive receptors incorporate screening, landscaping, and enclosure provisions necessary to prevent exposure to odor, noise, dust, smoke, gas, fumes, cinders, or refuse matter. |
| **Circulation and Mobility Element** | |
| CM-2.3 | **Bicycle connectivity.** Expand the bicycle network as proposed in the Active Transportation Plan; make needed infrastructure and landscaping improvements along roadways to facilitate safe travel. |
| CM-2.4 | **Walkways, paseos, and shared-use paths.** Identify and expand the City's pedestrian and bicycle network to include creative and context-sensitive opportunities, including but not limited to: paseos and walkways, shared use paths along abandoned rail tracks (rail trails). |
| CM-2.7* | **Bicycle parking and amenities.** Require new developments to plan for bicycle parking and amenities at the beginning of the planning and design process so that the facilities are properly sited in accessible, convenient, and highly visible locations. |
| CM-2.13* | **Complete street improvements.** Require land developers to adhere to the Complete Streets approach for projects that will impact the roadway right-of-way; the improvements should include bicycle and pedestrian facilities that provide connectivity to public transit facilities (if within ½ mile distance). |
| CM-2.14 | **Regional multi-modal transportation network.** Support partner agencies, such as Caltrans, SBCTA, Omnitrans, rail authorities, and adjacent jurisdictions on projects that will contribute to a regional and seamless multi-modal transportation network. |
| CM-3.2 | **Transit amenities.** Upgrade transit stops with amenities (e.g., pedestrian-scale lighting, shelter, seating, secure bicycle parking, signage) that create safer and more |

**Table 3.3-13 Air Quality: Proposed General Plan Update Policies**

| | |
|---|---|
| | comfortable experiences for transit users. Prioritize improvements along major transit corridors, focus areas, highly used transit stops, and mobility hubs. |
| CM-3.4 | **Mobility hubs.** Enhance mobility hubs at major points of interest, such as the Downtown Transit Center, Santa Fe Depot, and Cal State campus, with programs such as bike-sharing, scooter-sharing, and EV charging stations. |
| CM-4.2 | **TDM strategies.** Promote TDM strategies appropriate for the local context and land use, for example, to reduce employee commute trips or to reduce discretionary trips such as residential, shopping, or other. |
| CM-4.6 | **Transit passes.** Continue to support and expand, as feasible, OmniTrans' efforts to offer free or reduced-fare transit passes for students, seniors, low-income households, people with disabilities, and City employees. |
| CM-4.3* | **TDM in new development.** Require new developments to prioritize the incorporation of TDM strategies into project design at the outset as a means to reduce vehicle miles traveled (VMT) and improve air quality. |
| CM-6.3 | **Parking at transit hubs.** Reduce or eliminate parking minimums at new developments near transit hubs and stations, particularly along the TOD Overlay, to encourage transit use. |
| CM-7.2 | **Green energy.** Explore opportunities to accommodate new vehicle technology and alternative fuels by siting new charging/fuel stations, acquiring new vehicles, and implementing other measures to reduce GHG emissions from the City's transportation sector. |
| **Open Space and Conservation Element** | |
| OSC-7.1 | **Agency collaboration.** Collaborate with the SCAQMD to reduce pollution levels and improve air quality in accordance with regional, state, and federal standards in the Air Quality Management Plans. |
| OSC-7.2* | **Environmental review.** Require applications for proposed projects to include an evaluation of potential air quality impacts consistent with the AQMD's "Air Quality Analysis Guidance Handbook." This includes:<br>▪ Identification of criteria and toxic pollutants<br>▪ Analysis of construction and operational impacts<br>▪ Analysis of cumulative impacts<br>▪ Feasible mitigation measures to reduce impacts |
| OSC-7.8 | **Green infrastructure.** Support the expansion of and require, where feasible, the planting of green infrastructure, including but not limited to street trees, roadside vegetation, vegetated buffers, green roofs, and other proven strategies to help filter air pollutants. |
| OSC-7.7 | **Indirect sources.** Support California and federal regulations that aim to reduce and control air pollution from indirect sources. This includes support for:<br>▪ Reducing emissions from warehouse operations.<br>▪ Reducing emissions from railyard operations. |

**Table 3.3-13 Air Quality: Proposed General Plan Update Policies**

| | |
|---|---|
| | ▪ Reducing GHG emissions from power plants.<br>▪ Reducing emission levels from local airports. |
| OSC-7.9 | **Alternative transportation.** Support the expansion of alternatives to single-occupancy vehicle use, including but not limited to:<br>▪ Expanding the number and frequency of bus routes.<br>▪ Extending commuter rail infrastructure and trains.<br>▪ Building out the full pedestrian and bicycle network.<br>▪ Working with Omnitrans to support rider incentives. |
| OSC-7.10* | **Trucking emissions.** Enforce regulations to reduce the level of pollution and particulate matter emitted in San Bernardino. This includes:<br>▪ Restricting idling for heavy duty trucks.<br>▪ Siting fuel stations for low emission trucks.<br>▪ Enforcing compliance with adopted truck routes.<br>▪ Exploring incentives for zero emission vehicles. |
| **Health and Environmental Justice Element** | |
| HEJ-5.4 | **Air quality monitoring.** Work with the AB617 working group and other agencies to track air pollution, both stationary and mobile, to evaluate air quality and track air emissions such as particulate matter (PM), black carbon, fugitive dust, and other key pollutants. |

* Denotes mitigating policies

Despite the policies in the General Plan Update, the General Plan Update would exceed the South Coast AQMD regional significance thresholds. Therefore, the General Plan Update would significantly contribute to the nonattainment designation of the SoCAB and would cumulatively contribute to the nonattainment designations of the SoCAB. Long-term operational impacts of the project are **potentially significant**.

**Impact AIR-3a: Long-term emissions from buildout of the General Plan Update would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.**

> **Mitigation Measure AIR-2:** Prior to discretionary approval by the City of San Bernardino for development projects subject to CEQA (California Environmental Quality Act) review (i.e., nonexempt projects), project applicants shall prepare and submit a technical assessment evaluating potential project operation-phase-related air quality impacts to the City of San Bernardino Planning Division for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (South Coast AQMD) methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the South Coast AQMD–

adopted thresholds of significance, the City of San Bernardino Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the conditions of approval.

Possible mitigation measures to reduce long-term emissions could include but are not limited to the following:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
- Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
- Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 CCR Chapter 10 sec. 2485).
- Provide bicycle parking facilities per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Provide facilities to support electric charging infrastructure per the Nonresidential Voluntary Measures and Residential Voluntary Measures of CALGreen.
- Applicant-provided appliances shall be Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by the City during plan check.

**Significance with Mitigation:** Significant and unavoidable. Buildout in accordance with the General Plan Update would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Mitigation Measure AIR-2, in addition to the policies of the General Plan Update, would reduce air pollutant emissions to the extent feasible. As shown in Table 3.3-14, *Regional Emissions Forecast Compared to Existing Conditions*, compared to existing baseline year conditions, emissions of $NO_X$ are projected to decrease from current levels despite growth associated with the General Plan Update. However, there would still be an increase in VOCs and $PM_{2.5}$ from the increase in consumer product use and mobile sources associated with the General Plan Update. Therefore, construction- and operation-related regional air quality

impacts of developments that would be accommodated by the General Plan Update would remain **significant and unavoidable**.

**Table 3.3-14 Regional Emissions Forecast Compared to Existing Conditions**

| Scenario | Criteria Air Pollutant Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| **Existing – 2025 Emission Rates** | | | | | | |
| Transportation | 271 | 2,959 | 14,785 | 65 | 466 | 177 |
| Energy | 54 | 953 | 585 | 6 | 75 | 75 |
| Area - Offroad Equipment | 738 | 551 | 19,727 | 1 | 17 | 13 |
| Area - Consumer Products | 2,697 | — | — | — | — | — |
| **Existing Total** | 3,760 | 4,462 | 35,097 | 72 | 559 | 264 |
| **General Plan Update** | | | | | | |
| Transportation | 116 | 1,893 | 9,724 | 60 | 583 | 209 |
| Energy | 78 | 1,368 | 835 | 8 | 108 | 108 |
| Area - Offroad Equipment | 340 | 622 | 15,168 | 1 | 14 | 8 |
| Area - Consumer Products | 4,352 | — | — | — | — | — |
| **General Plan Update Total** | 4,885 | 3,884 | 25,727 | 70 | 705 | 324 |
| **Change** | | | | | | |
| Transportation | -156 | -1,066 | -5,062 | -4 | 117 | 32 |
| Energy | 24 | 415 | 250 | 3 | 33 | 33 |
| Area - Offroad Equipment | -398 | 72 | -4,558 | 0 | -3 | -5 |
| Area - Consumer Products | 1,655 | — | — | — | — | — |
| **Total** | **1,125** | **-579** | **-9,370** | **-2** | **146** | **60** |
| South Coast AQMD Regional Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Significant? | **Yes** | No | No | No | No | **Yes** |

Source: Appendix C.

## *Health Impacts*

Projects that contribute to the nonattainment status would also contribute to elevating health effects associated to these criteria air pollutants. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants.

It is speculative for this broad-based policy plan to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions, or how many additional individuals in the air basin would be affected by the health effects cited above. This EIR quantifies the increase in criteria air pollutants emissions in the plan area. However, at a programmatic level analysis, it is not feasible to quantify the increase in TACs from stationary sources associated with the proposed project or meaningfully correlate how regional criteria air pollutant emissions above the South Coast AQMD significance thresholds correlate with basinwide health impacts.

To determine cancer and noncancer health risk, the location, velocity of emissions, meteorology and topography of the area, and locations of receptors are equally important as model parameters as the quantity of TAC emissions. The white paper in Appendix C, "We Can Model Regional Emissions but Are the Results Meaningful for CEQA," describes several of the challenges of quantifying local effects—particularly health risks—for large-scale, regional projects, and these are applicable to both criteria air pollutants and TACs. Similarly, the two amicus briefs filed by the air districts on the Friant Ranch case (see Appendix C) describe two positions regarding CEQA requirements, modeling feasibility, variables, and reliability of results for determining specific health risks associated with criteria air pollutants. The discussions also include the distinction between criteria air pollutant emissions and TACs with respect to health risks. Additionally, the South Coast AQMD's Significance Thresholds and Monitoring demonstrate the infeasibility based on the current guidance/methodologies. The following discussion summarizes major points about the infeasibility of assessing health risks of criteria air pollutant emissions and TACs associated with implementation of a general plan.

To achieve and maintain air quality standards, the South Coast AQMD has established numerical emission indicators of significance for regional and localized air quality impacts for both construction and operational phases of a local plan or project. The South Coast AQMD has established the thresholds based on "scientific and factual data that is contained in the federal and state Clean Air Acts" and recommends "that these thresholds be used by lead agencies in making a determination of significance" (South Coast AQMD 1993). The numerical emission indicators are based on the recognition that the air basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health. The thresholds represent the maximum emissions from a plan or project that are expected not to cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. By analyzing the plan's emissions against the thresholds, an EIR assesses whether these emissions directly contribute to any regional or local exceedances of the applicable ambient air quality standards and exposure levels.

South Coast AQMD currently does not have methodologies that would provide the City with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions (see f.n. 11). For criteria air pollutants, exceedance of the regional significance thresholds cannot be used to correlate a project to quantifiable health

impacts unless emissions are sufficiently high to use a regional model. South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and their effect on health (see Appendix C: San Joaquin Valley Air Pollution Control District's amicus brief, and South Coast AQMD's amicus brief).

Ozone concentrations depend on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Secondary formation of particulate matter and ozone can occur far from sources as a result of regional transport due to wind and topography (e.g., low-level jet stream). Photochemical modeling depends on all emission sources in the entire domain (i.e., modeling grid). Low resolution and spatial averaging produce "noise" and modeling errors that usually exceed individual source contributions. Because of the complexities of predicting ground-level ozone concentrations in relation to the National AAQS and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds.

Current models used in CEQA air quality analyses are designed to estimate potential project construction and operation emissions for defined projects. The estimated emissions are compared to significance thresholds, which are keyed to reducing emissions to levels that will not interfere with the region's ability to attain the health-based standards. This serves to protect public health in the overall region, but there is currently no CEQA methodology to determine the impact of emissions (e.g., pounds per day) on future concentration levels (e.g., parts per million or micrograms per cubic meter) in specific geographic areas. CEQA thresholds, therefore, are not specifically tied to potential health outcomes in the region.

The EIR must provide an analysis that is understandable for decision making and public disclosure. Regional-scale modeling may provide a technical method for this type of analysis, but it does not necessarily provide a meaningful way to connect the magnitude of a project's criteria pollutant emissions to health effects without speculation. Additionally, this type of analysis is not feasible at a general plan level because the location of emissions sources and quantity of emissions are not known. However, because cumulative development in General Plan Update Area would exceed the regional significance thresholds, the General Plan Update could contribute to an increase in health effects in the basin until the attainment standards are met.

## Downtown Specific Plan

The DTSP Area covers approximately 621 acres of the City's downtown, and the DTSP outlines the land use and development standards for the nine proposed Land Use Districts in the DTSP area. Under implementation of the DTSP, the area is projected to grow by 14,152 new residential units and 11,732,858 square feet of nonresidential space by 2050 (refer to Table 2-8, *Total Development in the Downtown Specific Plan*). The DTSP is included in the emissions

forecast for the plan area, as shown in Table 3.3-12. Because the General Plan Update, which includes the DTSP, would exceed the South Coast AQMD regional significance thresholds, implementation of the DTSP would similarly contribute to the nonattainment designations of the SoCAB and would result in a **potentially significant** impact.

**Impact AIR-3b: Long-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.**

**Mitigation Measures:** Implement Mitigation Measure AIR-2.

**Significance with Mitigation:** Significant and unavoidable. Development within the DTSP Area would generate long-term emissions that would exceed South Coast AQMD's regional significance thresholds and would cumulatively contribute to the existing nonattainment designations in the SoCAB (see Table 3.3-12). Mitigation Measure AIR-2 and the policies of the General Plan Update would reduce operation-related air pollutant emissions to the extent feasible. However, because of the magnitude and intensity of development accommodated by the DTSP as well as regional air quality influences beyond the control of the City, AIR-3b impacts would remain **significant and unavoidable**.

**c) Would the project expose sensitive receptors to substantial pollutant concentrations?**

## CONSTRUCTION

### General Plan and Development Code Update

#### *Construction LSTs and TACs*

Buildout of the General Plan Update would occur over the buildout horizon of the plan via several smaller projects, each with its own construction time frame and equipment. Because a localized emissions analysis can only be conducted at a project-level, quantification of localized impacts is not applicable for the program-level environmental analysis. Because potential development and redevelopment could occur near existing sensitive receptors, future development projects accommodated by the General Plan Update could temporarily expose these receptors to substantial pollutant concentrations or elevated levels of TACs, depending on the type and intensity of construction activities (e.g., grading). Consequently, construction equipment exhaust (including DPM) combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions and TACs and result in **potentially significant** impacts.

**Impact AIR-4a: Construction activities associated with buildout of the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations.**

**Mitigation Measure:** Implementation of Mitigation Measure AIR-1 (construction).

**Significance with Mitigation: Significant and Unavoidable.** Construction activities associated with the General Plan Update could expose sensitive receptors to substantial concentrations of criteria air pollutants and/or TACs. Mitigation Measure AIR-1 would require that future development projects incorporate measures to reduce construction emissions that would minimize exposure of sensitive receptors to elevated concentrations of criteria air pollutant emissions and TACs to the extent feasible. However, because existing sensitive receptors may be close to project-related construction activities and result in new sources of criteria air pollutants emissions and/or TACs near existing or planned sensitive receptors, construction emissions generated by individual development projects have the potential to exceed South Coast AQMD's localized thresholds. Even with implementation of Mitigation Measure AIR-1, localized construction emissions impacts would remain **significant and unavoidable**.

## Downtown Specific Plan

As described above, construction under the General Plan Update, including the DTSP, has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutants and TACs.

**Impact AIR-4b: Construction activities associated with buildout of the DTSP could expose sensitive receptors to substantial toxic air contaminant concentrations.**

**Mitigation Measure:** Implement Mitigation Measures AIR-1.

**Significance with Mitigation: Significant and Unavoidable.** Construction activities associated with the DTSP could expose sensitive receptors to substantial concentrations of criteria air pollutants and/or TACs. Mitigation Measure AIR-1 would require that future development projects incorporate measures to reduce construction emissions that would minimize exposure of sensitive receptors to elevated concentrations of criteria air pollutant emissions and TACs. However, because existing sensitive receptors may be close to project-related construction activities and result in new sources of criteria air pollutants emissions and/or TACs near existing or planned sensitive receptors, construction emissions associated with the DTSP have the potential to exceed South Coast AQMD's localized thresholds. Even, with implementation of Mitigation Measure AIR-1, localized construction emissions impacts would remain **significant and unavoidable**.

## OPERATION

Development and operation of new land uses accommodated under the General Plan Update could generate new sources of criteria air pollutants and TACs in the General Plan Update Area from area/stationary sources and mobile sources. Implementation of the General Plan Update could expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute significantly to elevating those levels. Unlike mass of emissions shown in Table 3.3-12, described in pounds per day, localized concentrations refer to an amount of pollutant in a volume of air (ppm or $\mu g/m^3$) and can be correlated to potential health effects.

### General Plan and Development Code Update

#### *CO Hotspots*

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. In 2007, the SoCAB was designated in attainment for CO under both the California AAQS and National AAQS. The CO hotspot analysis conducted for the attainment by South Coast AQMD did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods.[17] As identified in South Coast AQMD's 2003 AQMP and the *1992 Federal Attainment Plan for Carbon Monoxide* (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB in previous years, prior to redesignation, were a result of unusual meteorological and topographical conditions and not of congestion at a particular intersection (South Coast AQMD 1992; South Coast AQMD 2003).

A project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (Bay Area Air District 2023). Implementation of the General Plan Update would not result in hourly traffic increases of this magnitude. According to traffic volume data provided by KOA, the intersection with the highest projected traffic demand in the forecast year is expected to experience 6,311 PM peak hour vehicle trips (see Appendix I-1). Thus, implementation of the General Plan Update would not produce the volume of traffic required to generate a CO hotspot. As such, the General Plan Update would result in a **less than significant** CO hotspots impact.

[17] The four intersections were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning peak hour and LOS F in the evening peak hour.

### *Operation LSTs*

The General Plan Update includes land uses that could generate substantial amounts of criteria air pollutant emissions from stationary source emissions include industrial land uses. Implementation of the General Plan Update policies would reduce criteria air pollutant emissions to nearby sensitive receptors, to the extent feasible.

Table 3.3-15, *Sensitive Receptors: Proposed General Plan Update Policies*, identifies mitigating policies of the General Plan Update that have the potential to minimize impacts from new sources of air pollution on existing and future sensitive receptors. Specifically, policies LUD-5.4, LUD-5.5, LUD-5.6, and LUD-11.5 would help prevent detrimental impacts on nearby sensitive land uses.

**Table 3.3-15 Sensitive Receptors: Proposed General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-5.4* | **High impact uses.** Control the location and number of community-sensitive uses, such as alcohol and tobacco sales, adult bookstores and businesses, game arcades, truck and container yards, warehousing and distribution, and similar uses based on proximity to residences, schools, religious facilities, parks, and sensitive uses. |
| LU-5.5* | **Environmental land uses.** Require technical studies when reviewing new developments to ensure that they do not impose unacceptable levels of noise, air pollution, traffic, dust, vibration, odors, or other detrimental impacts on nearby sensitive land uses. |
| LU-5.6 | **Reducing impacts from existing incompatible uses.** Where existing land uses that have been approved and built adversely impact adjacent sensitive uses, work with affected parties to seek funding and develop creative ways to reduce negative impacts on sensitive land uses. |
| LU-11.5 | **Compatibility with adjoining uses.** Ensure that all industrial facilities near sensitive receptors incorporate screening, landscaping, and enclosure provisions necessary to prevent exposure to odor, noise, dust, smoke, gas, fumes, cinders, or refuse matter. |
| LU-12.2 | **Integrate infrastructure with community setting.** Sensitively integrate regional and local-supporting infrastructure into San Bernardino's neighborhoods, commercial and industrial districts, and corridors. |
| **Circulation and Mobility Element** | |
| CM-5.1 | **Sensitive areas.** Where feasible, avoid truck routes on roadways that are adjacent to residential areas and other land uses that serve sensitive populations, such as schools, daycares, and medical facilities. |
| **Open Space and Conservation Element** | |
| OSC-7.2* | **Environmental review.** Require applications for proposed projects to include an evaluation of potential air quality impacts consistent with the AQMD's "Air Quality Analysis Guidance Handbook." This includes: |

### Table 3.3-15 Sensitive Receptors: Proposed General Plan Update Policies

| | |
|---|---|
| | ▪ Identification of criteria and toxic pollutants<br>▪ Analysis of construction and operational impacts<br>▪ Analysis of cumulative impacts<br>▪ Feasible mitigation measures to reduce impacts |
| OSC-7.3* | **Industrial uses.** Support the implementation and enforcement of SCAQMD rules requiring existing warehouse projects and railroads comply with applicable rules and laws, including but not limited to:<br>▪ Support Rule 2305 to reduce emissions of particulate and nitrogen oxides from qualified warehouses.<br>▪ Ensure that qualified projects meet operational and design standards for 21st-century warehouses.<br>▪ Support Rule 2306 to reduce diesel particulate and nitrogen oxide emissions from railyards. |
| OSC-7.7* | **Indirect sources.** Support California and federal regulations that aim to reduce and control air pollution from indirect sources. This includes support for:<br>▪ Reducing emissions from warehouse operations.<br>▪ Reducing emissions from railyard operations.<br>▪ Reducing GHG emissions from power plants.<br>▪ Reducing emission levels from local airports. |
| OSC-7.10* | **Trucking emissions.** Enforce regulations to reduce the level of pollution and particulate matter emitted in San Bernardino. This includes:<br>▪ Restricting idling for heavy duty trucks.<br>▪ Siting fuel stations for low emission trucks.<br>▪ Enforcing compliance with adopted truck routes.<br>▪ Exploring incentives for zero emission vehicles. |
| **Health and Environmental Justice Element** | |
| HEJ-5.3* | **Trucking routes.** Develop, maintain, and amend as needed a comprehensive system of local truck routes that meets the needs of the City's logistics economy while protecting residential and sensitive land uses from the air pollution emissions from trucks. Require logistics uses to mitigate impacts to the extent feasible. |
| HEJ-5.5* | **Pollution impacts.** Require new or substantially expanded industrial and manufacturing uses to conduct an analysis of impacts from pollution emissions. Require implementation of pollutant mitigation measures determined to be feasible at the time of project approval. |
| HEJ-5.9* | **Health risk assessments.** As allowed by CEQA and state law, require that new qualifying projects prepare a cumulative health risk assessment to determine whether construction or operational impacts exceed established risk thresholds; require that developers demonstrate mitigation of impacts prior to the approval of the project. |

* Denotes mitigating policies

The proposed policies would minimize emissions from new development projects accommodated by the General Plan Update to the extent feasible. However, per the LST methodology, information regarding specific development projects and the locations of receptors would be needed in order to quantify the levels of localized operation and construction-related impacts associated with future development projects. Because the General Plan Update is a broad-based policy plan and does not itself propose specific development projects, it is not possible to calculate individual project-related operation emissions at this time. Overall, because of the likely scale of future development and the inclusion of industrial uses that would be accommodated by the General Plan Update, some development projects could exceed the LSTs. Therefore, localized operation-related air quality impacts associated with implementation of the General Plan Update are considered **potentially significant** impacts.

### *Toxic Air Contaminants*

Buildout of the General Plan Update could elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use off-road equipment operating on-site, and at different levels depending on the type of activity (for example, limited to none during installation of utilities, and more during grading activities). Operation of the development allowed under the General Plan Update would also generate DPM emissions from diesel truck activity (truck maneuvering and idling), TRUs, and diesel-fueled off-road equipment (i.e., forklifts and yard trucks) in proximity to nearby sensitive receptors.

#### ***Permitted Stationary Sources***

Various industrial and commercial processes (e.g., manufacturing, dry cleaning) allowed under the Land Use Plan would be expected to release TACs. Industrial land uses such as chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities have the potential to be substantial stationary sources that would require a permit from South Coast AQMD. As listed in Table 3.3-15, Policies LUD-5.5, LUD-5.6, LUD-11.5, OSC-7.4, HEJ-5.1, and HEJ-5.9 would ensure development to be compatible with surrounding land uses to reduce environmental effects on sensitive receptors. Moreover, emissions of TACs would be controlled by South Coast AQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under South Coast AQMD Rule 1401, which would ensure **less than significant** impacts.

#### ***Truck Routes and Non-permitted Sources (Industrial Land Uses)***

Warehousing or industrial operations generate substantial DPM emissions from off-road equipment use, truck idling, and/or use of transport refrigeration units for cold storage, which are area or mobile sources that are not directly regulated by South Coast AQMD. The General Plan Update could result in a net increase of 15,184,374 square feet of industrial land use. Though stationary sources associated with the General Plan Update would be required to

comply with South Coast AQMD Rule 1401, truck idling does not fall under the purview of the air district. However, Policies HEJ-5.5 and HEJ-5.6 call for mitigating potential air quality impacts associated with industrial and other nonresidential land uses. Policy OSC-7.4 would require new development projects to minimize exposure of new sensitive receptors to criteria air pollutants and toxic air contaminants to the greatest extent possible. Overall, these policies would contribute to minimizing health risk impacts to the surrounding sensitive receptors. However, until specific future development projects are proposed, the associated emissions and concentrations cannot be determined or modeled. Thus, health risk impacts from development of industrial land uses associated with the General Plan Update are considered **potentially significant**.

### *Summary*

As described above, long-term operation of the General Plan Update would not have the potential to generate CO hotspots. However, long-term operation of the General Plan Update would result in a substantial increase in development that would generate an increase in criteria air pollutants and TACs in the plan area. Permitted sources of emissions would be regulated by South Coast AQMD and do not have the potential to result in elevated concentrations of air pollutants near sensitive receptors. However, long-term operation of area and mobile sources have the potential to expose sensitive receptor to substantial concentrations of air pollutants. Therefore, this impact is **potentially significant**.

**Impact AIR-5a: Operation of the General Plan Update could expose sensitive receptors to substantial criteria air pollutant and/or toxic air contaminant concentrations.**

Implementation of Mitigation Measure AIR-2, in addition to the following Mitigation Measure:

> **Mitigation Measure AIR-3: Industrial and Warehouse Development Health Risk Assessments.** Prior to discretionary approval by the City of San Bernardino, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of San Bernardino Planning Division for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast AQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective threshold, as established by the South Coast AQMD at the time a project is considered, the project applicant will be required to identify best available control technologies for toxics (T-BACTs) and appropriate enforcement mechanisms and demonstrate that they are capable of reducing potential cancer and

noncancer risks to an acceptable level. T-BACTs may include but are not limited to restricting idling on-site or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

**Significance with Mitigation:** Significant and unavoidable. Buildout of the General Plan Update could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. Mitigation Measure AIR-2 would require that projects that exceed the South Coast AQMD thresholds of significance incorporate mitigation measures to reduce criteria air pollutant emissions during operational activities to less than significant levels. Mitigation Measure AIR-3 would require operational HRAs for applicable industrial development projects to reduce potential cancer and noncancer risks associated with air toxics to an acceptable level. Individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD, and TACs would be less than significant. However, the net increase in industrial land use allowed under the General Plan Update would generate TACs that could contribute to elevated TAC levels in the air basin. Though individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of cancer risk in the SoCAB, and therefore result in a cumulatively considerable impact. Therefore, the General Plan Update's cumulative contribution to health risk is considered **significant and unavoidable**.

## Downtown Specific Plan

Under implementation of the DTSP, the DTSP Area is projected to grow by 14,152 new residential units and 11,732,858 square feet of nonresidential space by 2050 (refer to Table 2-8, *Total Development in the Downtown Specific Plan*). The southern area of the DTSP is largely characterized by commercial and industrial centers (refer to Table 2-5, *Existing Development in the Downtown Specific Plan,* and Figure 2-7, *Existing Land Uses in the Downtown Specific Plan Area*).

As described above, long-term operation of the General Plan Update would not have the potential to generate CO hotspots. However, long-term operation of the General Plan Update would result in a substantial increase in development that would generate an increase in criteria air pollutants and TACs in the DTSP area. Permitted sources of emissions would be regulated by South Coast AQMD and do not have the potential to result in elevated concentrations of air pollutants near sensitive receptors. However, long-term operation of area and mobile sources that are not directly regulated by South Coast AQMD have the potential to expose sensitive receptors to substantial concentrations of air pollutants. The DTSP could result in a net increase of 11,732,857 square feet of non-residential space by 2050, which could include industrial land uses (refer to Table 2-9, *Downtown Specific Plan Buildout Summary*). However, until specific future development projects are proposed, the associated emissions and concentrations cannot

be determined or modeled. Thus, impacts from development of industrial land uses associated with the DTSP are considered **potentially significant**.

**Impact AIR-5b: Operation of the DTSP could expose sensitive receptors to substantial toxic air contaminant concentrations.**

**Mitigation Measure:** Implement Mitigation Measures AIR-2 and AIR-3.

**Significance with Mitigation:** Significant and unavoidable. Buildout of the DTSP could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. Mitigation Measure AIR-2 would require that projects that exceed the South Coast AQMD thresholds of significance incorporate mitigation measures to reduce criteria air pollutant emissions during operational activities to less than significant levels. Mitigation Measure AIR-3 would require HRAs for applicable industrial development projects to ensure that T-BACTs are utilized to reduce potential cancer and noncancer risks to an acceptable level. Individual development projects would be required to achieve the incremental risk thresholds established by South Coast AQMD, and TACs would be less than significant. However, the net increase in industrial land use allowed under the DTSP would generate TACs that could contribute to elevated TAC levels in the air basin. While individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of cancer risk in the SoCAB, and therefore, result in a cumulatively considerable impact. Therefore, the DTSP's cumulative contribution to health risk is considered **significant and unavoidable**.

### d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Growth within the City under the General Plan Update could generate new sources of odors. Nuisance odors from land uses in the SoCAB are regulated under South Coast AQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

## Industrial Land Uses

Compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), asphalt batch manufacturing plants, chemical manufacturing, and food manufacturing facilities are typical sources of odors from industrial land uses. Industrial land uses are required to comply with South Coast AQMD Rule 402. As identified above, the General Plan Update could result in a net increase of 15,184,374 square feet in new industrial/warehousing in the plan area. Industrial land uses are required to comply with South Coast AQMD Rule 402 and future environmental review, which would ensure that sensitive land uses are not exposed to objectionable odors. Overall, impacts from potential odors generated from industrial land uses associated with the General Plan Update are considered **less than significant**.

## Residential and Other Retail/Commercial Land Uses

Residential and other nonresidential, nonindustrial land uses that would be accommodated by the General Plan Update could result in the generation of odors such as exhaust from landscaping equipment and from cooking/restaurants. Buildout of the General Plan Update would result in a net increase of 18,020 square feet of commercial land uses. However, unlike industrial land uses, these are not considered likely potential generators of odor that could affect a substantial number of people. Nuisance odors are regulated under South Coast AQMD Rule 402, which requires abatement of any nuisance generating a verified odor complaint. Overall, impacts from potential odors generated from residential and other nonresidential land uses associated with the General Plan Update are considered **less than significant**.

## Construction

During construction activities of development projects that would be accommodated by the General Plan Update, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Noxious odors would be confined to the immediate vicinity of the construction equipment in use. By the time such emissions reached any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Short-term construction-related odors are expected to cease upon the drying or hardening of odor-producing materials. Overall, impacts associated with construction-generated odors from the General Plan Update are considered **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Development and operation of the future development planned under the DTSP could also generate new sources of odors. However, compliance with South Coast AQMD Rule 402 and

future environmental review would ensure that potential odors generated from industrial, residential, and other nonresidential land uses associated with the DTSP would be reduced to less than significant level. Construction activities would be temporary and confined to the immediate vicinity of the construction equipment in use. Consequently, short-term construction-related odors would also be considered **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.3.5 Cumulative Impact Analysis

**Would the project have a cumulative effect related to air quality?**

### REGIONAL EMISSIONS

The cumulative setting for air quality is the SoCAB. In accordance with the South Coast AQMD methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment, contributes to the cumulative impact. Cumulative projects include new development and general growth within the SoCAB. The SoCAB is nonattainment for $O_3$, $PM_{10}$, and $PM_{2.5}$. Due to the extent of the area potentially impacted from cumulative project emissions, South Coast AQMD considers a project cumulatively significant when project-related emissions exceed the regional emissions thresholds. As identified in Impact Discussion 'b', implementation of the General Plan Update would contribute to the nonattainment designations of the air basin, and impacts are **cumulatively considerable**.

### TOXIC AIR CONTAMINANTS

The General Plan Update, including the DTSP, would generate TACs that would contribute to elevated levels of risk in the air basin. Mitigation Measure AIR-3, would require HRAs for applicable industrial development projects to ensure potential cancer and noncancer risks are reduced to an acceptable level. While individual projects would achieve the project-level risk threshold of 10 per million, they would nonetheless contribute to the higher levels of cancer risk in the SoCAB. Therefore, the General Plan Update's contribution to health risk would be **cumulatively considerable**.

### ODORS

The General Plan Update, including the DTSP, would generate new sources of odors associated with future industrial, residential, and other retail/commercial land uses. However, compliance with South Coast AQMD Rule 402 and future environmental review would ensure that potential odors would be reduced and that sensitive land uses are not exposed to objectionable odors. Therefore, the General Plan Update's cumulative contribution to potential odor impacts would be less than cumulatively considerable.

**Impact AIR-6: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative air quality impacts with respect to generation of criteria pollutants and exposure of substantial pollutant concentrations at sensitive receptors.**

**Mitigation Measures:** Implement Mitigation Measures AIR-1 through AIR-3.

**Significance with Mitigation:** Significant and unavoidable. Air pollutant emissions associated with the proposed project would result in a cumulatively considerable contribution to air quality impacts and remain **significant and unavoidable and cumulatively considerable** at the plan level.

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# 3.4 BIOLOGICAL RESOURCES

This section of the DEIR evaluates the potential biological-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, referred to together as the "proposed project." Summaries of the relevant regulatory framework and existing conditions are followed by a discussion of the project-specific and cumulative impacts. The analysis in this section is based on the following technical report:

- *Biological Resources Technical Report for the City of San Bernardino General Plan Update*, ECORP Consulting, Inc., June 2025 (Appendix D).

## 3.4.1 Regulatory Framework

### FEDERAL

### Endangered Species Act

The federal Endangered Species Act (ESA) protects plants and animals that are listed as endangered or threatened by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 U.S. Code [USC]1538). Under Section 7 of the ESA, federal agencies are required to consult with USFWS if their actions, including permit approvals or funding, could adversely affect a listed (or proposed) species (including plants) or its critical habitat. Through consultation and the issuance of a Biological Opinion (BO), USFWS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of the ESA provides for issuance of incidental take permits where no other federal actions are necessary provided a Habitat Conservation Plan (HCP) is developed.

#### *Section 7*

Section 7 of the ESA mandates that all federal agencies consult with USFWS and/or NMFS to ensure that federal agencies' actions do not jeopardize the continued existence of a listed species or adversely modify Critical Habitat for listed species. If adverse effects to a species or its Critical Habitat are likely, the applicant must conduct a Biological Assessment (BA) for the

purpose of analyzing the potential effects of the project on listed species and Critical Habitat to establish and justify an "effect determination." The federal agency reviews the BA; if it concludes that the project may adversely affect a listed species or its habitat, it prepares a BO. Through consultation and the issuance of a BO, USFWS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. The BO may require implementation of "reasonable and prudent measures" to avoid or minimize adverse impacts on the species population(s) or adverse modification of critical habitat.

### *Section 10*

When no discretionary action is being taken by a federal agency but a project may result in the take of listed species, an Incidental Take Permit (ITP) under Section 10 of the ESA is necessary. The purpose of the ITP is to authorize the take of federally listed species that may result from an otherwise lawful activity. In order to obtain an ITP under Section 10, an application must be submitted that includes an HCP. In some instances, applicants, USFWS, and/or NMFS may determine that an HCP is necessary or prudent, even if a discretionary federal action will occur. The purpose of the HCP planning process associated with the permit application is to ensure that adequate minimization and mitigation for impacts to listed species and/or their habitat will occur.

### *Critical Habitat*

Critical habitat is defined in Section 3 of the ESA as:

1. The specific areas within the geographical area occupied by a species, at the time it is listed in accordance with the ESA, on which are found those physical or biological features essential to the conservation of the species and that may require special management considerations or protection; and

2. Specific areas outside the geographical area occupied by a species at the time it is listed, upon a determination that such areas are essential for the conservation of the species.

For inclusion in a critical habitat designation, habitat within the geographical area occupied by the species at the time it was listed must first have features that are essential to the conservation of the species. Critical habitat designations identify, to the extent known and using the best scientific data available, the physical or biological features needed for life processes. Physical and biological features that are essential to the conservation of the species may require special management considerations or protection. These include but are not limited to:

- Space for individual and population growth and for normal behavior.
- Food, water, air, light, minerals, or other nutritional or physiological requirements.

- Cover or shelter.
- Sites for breeding, reproduction, or rearing (or development) of offspring.
- Habitats that are protected from disturbance or are representative of the historic, geographical, and ecological distributions of a species.

## Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) (USFWS 1918) implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized by the MBTA, USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR Part 13 General Permit Procedures and 50 CFR Part 21 Migratory Bird Permits. The State of California has incorporated the protection of birds of prey in Sections 3800, 3513, and 3503.5 of the California Fish and Game Code.

## Clean Water Act

The purpose of the federal Clean Water Act (CWA) is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Section 404 of the CWA prohibits the discharge of dredged or fill material into Waters of the U.S. without a permit from the U.S. Army Corps of Engineers (USACE). The definition of Waters of the U.S. includes rivers, streams, estuaries, the territorial seas, ponds, lakes, and wetlands. Wetlands are defined as those areas "that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3 c1). The U.S. Environmental Protection Agency acts as a cooperating agency to set policy, guidance, and criteria for use in evaluating permit applications and reviewing USACE permit applications.

The USACE regulates fill or dredging of fill material within its jurisdictional features. Fill material means any material used for the primary purpose of replacing an aquatic area with dry land or changing the bottom elevation of a water body. Substantial impacts to wetlands may require an individual permit. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by the State Water Quality Control Board, administered by each of nine California Regional Water Quality Control Boards (RWQCB).

## Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the USACE, for the construction of any structure in or over any navigable Waters of the U.S. Structures or work outside the limits defined for navigable Waters of the U.S. require a Section 10 permit if the structure or work affects the course, location, or condition of the water body. The law applies to any dredging or disposal of dredged materials, excavation, filling, re-channelization, or any other modification of a navigable Water of the U.S., and applies to all structures, from the smallest floating dock to the largest commercial undertaking. It further includes, without limitation, any wharf, dolphin, weir, boom breakwater, jetty, groin, bank protection (e.g., riprap, revetment, bulkhead), mooring structures such as pilings, aerial or subaqueous power transmission lines, intake or outfall pipes, permanently moored floating vessel, tunnel, artificial canal, boat ramp, aids to navigation, and any other permanent, or semi-permanent obstacle or obstruction. The alteration of a USACE-federally authorized civil works project requires a permit pursuant to Section 14 of the Act, as amended and codified in 33 USC 408. Projects with minimal impacts require approval by the USACE Los Angeles District Construction Operations Group; however, projects with more substantial impacts may require USACE Headquarters review. Coordination with the San Bernardino County Flood Control District, who serves as the non-federal sponsor, is required as a part of the process of obtaining a Section 408 permit.

# STATE

## California Endangered Species Act

The California ESA (California Fish and Game Code secs. 2050–2116) protects species of fish, wildlife, and plants listed by the State as endangered or threatened. Species identified as candidates for listing may also receive protection. Section 2080 of the California ESA prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” The California ESA allows for take incidental to otherwise lawful projects under permits issued by the California Department of Fish and Wildlife (CDFW). State lead agencies are required to consult with the CDFW to ensure that any action they undertake is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of essential habitat.

### *Fully Protected Species*

The State of California first began to designate species as “fully protected” prior to the creation of the federal and California ESAs. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction and included fish, amphibians and reptiles, birds, and mammals. Most fully protected species have since been

listed as threatened or endangered under the federal and/or California ESAs. Fully protected species are identified in the California Fish and Game Code Section 4700 for mammals, Section 3511 for birds, Section 5050 for reptiles and amphibians, and Section 5515 for fish.

These sections of the California Fish and Game Code provide that fully protected species may not be taken or possessed at any time, including prohibition of CDFW from issuing incidental take permits for fully protected species under California ESA. CDFW will issue licenses or permits for take of these species for necessary scientific research or live capture and relocation pursuant to the permit and may allow incidental take for lawful activities carried out under an approved Natural Community Conservation Plan (NCCP) within which such species are covered.

## Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code secs. 1900–1913) was established with the intent to "preserve, protect and enhance rare and endangered plants in this state." The NPPA is administered by CDFW. The Fish and Game Commission has the authority to designate native plants as "endangered" or "rare." The NPPA prohibits the take of plants listed under the NPPA, though the NPPA contains exemptions to this prohibition that have not been clarified by regulation or judicial rule. In 1984, the California ESA brought under its protection all plants previously listed as endangered under NPPA. Plants listed as rare under NPPA are not protected under the California ESA but are still protected under the provisions of NPPA. The Fish and Game Commission no longer lists plants under NPPA, reserving all listings to the California ESA.

## California Fish and Game Code Special Protection for Birds

In addition to protection in the California ESA and California Fish and Game Code Section 351,1 described above, the California Fish and Game Code includes several sections that specifically protect certain birds:

- **Section 3800** states that it is unlawful to take nongame birds, such as those occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds, except when in accordance with regulations of the California Fish and Game Commission or a mitigation plan approved by CDFW for mining operations.
- **Section 3503** prohibits the take, possession, or needless destruction of the nest or eggs of any bird.
- **Section 3503.5** protects birds of prey (which includes eagles, hawks, falcons, kites, ospreys, and owls) and prohibits the take, possession, or destruction of any birds and their nests.
- **Section 3505** makes it unlawful to take, sell, or purchase egrets, ospreys, and several exotic nonnative species, or any part of these birds.
- **Section 3513** specifically prohibits the take or possession of any migratory nongame bird as designated in the MBTA.

## Lake or Streambed Alteration Agreements

Section 1602 of the California Fish and Game Code requires individuals or agencies to provide a Notification of Lake or Streambed Alteration to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions and, if necessary, submits to the applicant a proposal for measures to protect affected fish and wildlife resources. The final proposal mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement (SAA). Often, projects that require an SAA also require a permit from the USACE under Section 404 of the CWA. In these instances, the conditions of Section 404 permit and the SAA may overlap.

## Porter Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the Waters of the State to file a report of discharge" with RWQCB through State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures) (California Code of Regulations [CCR], Title 23, Section 3855) (State Water Resources Control Board 2021). Waters of the State are defined as any surface water or groundwater, including saline waters, within the boundaries of the State (California Water Code Section 13050[e]). Pollution is defined as an alteration of the quality of the Waters of the State by waste to a degree that unreasonably affects its beneficial uses (California Water Code Section 13050) and includes filling in Waters of the State. Note that CCR, Title 23, Section 3855 applies only to individual water quality certifications, but the new Procedures extend the application of Section 3855 to individual waste discharge requirements for discharges of dredged or fill material to Waters of the State and waivers thereof.

A permit for impacts to Waters of the State would likely be required under the CWA and/or Porter-Cologne Water Quality Control Act. RWQCB considers whether project activities could affect the quality of Waters of the State to determine whether a project should be regulated pursuant to the Porter-Cologne Water Quality Control Act.

On September 27, 2023, the U.S. Environmental Protection Agency published its final 2023 Clean Water Act Section 401 Quarter Quality Certification Improvement Rule (88 Federal Register [FR] 66558). The final 2023 Rule revises and replaces the 2020 Rule's regulatory requirements for water quality certification that were adopted by the prior federal administration. The updates realign the scope of the Section 401 certification process with established practices, while also restoring the roles of states, territories, and authorized Tribes as certifying agencies.

## California Environmental Quality Act

In accordance with CEQA Guidelines Section 15380, a species or subspecies not specifically protected under the federal or California ESAs or NPPA may be considered endangered, rare, or threatened for CEQA review purposes if the species meet certain criteria specified in the Guidelines. These criteria parallel the definitions used in ESA, California ESA, and NPPA. Section 15380 was included in the CEQA Guidelines primarily to address situations in which a project under review may have a significant effect on a species that has not been listed under the ESA, California ESA, or NPPA, but that may meet the definition of endangered, rare, or threatened. Animal species identified as Species of Special Concern (SSC) by CDFW, birds identified as Birds of Conservation Concern (BCC) by USFWS, and plants identified by the California Native Plant Society (CNPS) as rare, threatened, or endangered may meet the CEQA definition of rare or endangered.

## Species of Special Concern

SSC are defined by CDFW as a species, subspecies, or distinct population of an animal native to California that are not legally protected under the federal ESA, California ESA, or California Fish and Game Code, but currently satisfies one or more of the following criteria:

- The species has been completely extirpated from the state or, as in the case of birds, it has been extirpated from its primary seasonal or breeding role.
- The species is listed as federally (but not state) threatened or endangered or meets the State definition of threatened or endangered but has not formally been listed.
- The species has or is experiencing serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for state threatened or endangered status.
- The species has naturally small populations that exhibit high susceptibility to risk from any factor that if realized, could lead to declines that would qualify it for state threatened or endangered status.
- SSC are typically associated with habitats that are threatened. (CDFW 2025a)

Depending on the policy of the lead agency, projects that result in substantial impacts to SSC may be considered significant under CEQA.

## Birds of Conservation Concern

The 1988 amendment to the Fish and Wildlife Conservation Act mandates USFWS identifies species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under ESA (See Appendix D). To meet this requirement, USFWS published a list of BCC for the U.S. The list identifies the migratory and nonmigratory bird species (beyond those already designated as federally

threatened or endangered) that represent USFWS's highest conservation priorities. Depending on the policy of the lead agency, projects that result in substantial impacts to BCC may be considered significant under CEQA.

## Sensitive Natural Communities

The CDFW maintains the California Natural Community List (CDFW 2025b), which provides a list of vegetation alliances, associations, and special stands as defined in the Manual of California Vegetation (CNPS 2025a) along with their respective state and global rarity ranks. Natural communities with a state rarity rank of S1, S2, or S3 are considered sensitive natural communities. Depending on the policy of the lead agency, impacts to sensitive natural communities may be considered significant under CEQA.

## California Rare Plant Ranks

The CNPS maintains the Inventory of Rare and Endangered Plants of California (CNPS 2025b), which provides a list of plant species native to California that are threatened with extinction, have limited distributions, and/or low populations. Plant species meeting one of these criteria are assigned to one of six California Rare Plant Ranks (CRPRs). The rank system was developed in collaboration with government, academia, non-governmental organizations, and private-sector botanists, and is jointly managed by CDFW and the CNPS. The CRPRs are currently recognized in the California Natural Diversity Database (CNDDB). The following are definitions of the CNPS CRPRs:

- **Rare Plant Rank 1A –** presumed extirpated in California and either rare or extinct elsewhere.
- **Rare Plant Rank 1B –** rare, threatened, or endangered in California and elsewhere.
- **Rare Plant Rank 2A –** presumed extirpated in California, but more common elsewhere.
- **Rare Plant Rank 2B –** rare, threatened, or endangered in California but more common elsewhere.
- **Rare Plant Rank 3 –** a review list of plants about which more information is needed.
- **Rare Plant Rank 4 –** a watch list of plants of limited distribution.

Additionally, CNPS has defined Threat Ranks that are added to the CRPR as an extension. Threat Ranks designate the level of threat on a scale of 1 through 3, with 1 being the most threatened and 3 being the least threatened. Threat Ranks are generally present for all plants ranked 1B, 2B, or 4, and for the majority of plants ranked 3. Plant species ranked 1A and 2A (presumed extirpated in California), and some species ranked 3, which lack threat information, do not typically have a Threat Rank extension. The following are definitions of the CNPS Threat Ranks:

- Threat Rank 0.1 – Seriously threatened in California (more than 80 percent of occurrences threatened/high degree and immediacy of threat).

- **Threat Rank 0.2 –** Moderately threatened in California (20 to 80 percent occurrences threatened/moderate degree and immediacy of threat).
- **Threat Rank 0.3 –** Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known).
- Factors such as habitat vulnerability and specificity, distribution, and condition of occurrences are considered in setting the Threat Rank; and differences in Threat Ranks do not constitute additional or different protection (CNPS 2025b).

Depending on the policy of the lead agency, substantial impacts to plants ranked 1A, 1B, 2, and 3 are typically considered significant under CEQA Guidelines § 15380. Significance under CEQA is typically evaluated on a case-by-case basis for plants ranked 4 and at the discretion of the CEQA lead agency.

### LOCAL

### San Bernardino Municipal Code

Title 15, Removal or Destruction of Trees, Chapter 15.34.020, Permit Required, of the San Bernardino Municipal Code (SBMC) prohibits cutting down, uprooting, destroying, and/or the removal of more than five trees within any 36-month period from a development site or parcel of property without first being issued a permit from the Development Services Department of the City of San Bernardino (SBMC sec. 15. 34. 020). Per the SBMC, a permit shall not be required when a lawful order to remove the trees for health and safety purposes has been issued by a local, state, or federal government agency; nor shall a permit be required if a removal is to be accomplished by, or under the auspices of a governmental entity or employee(s) thereof. Commercial tree farms are also an exception.

## 3.4.2 Existing Conditions

The following existing conditions information is from Appendix D of this DEIR unless otherwise noted. Additional information and sources for the following information can be found Appendix D.

### CITYWIDE AREA

### Vegetation Communities and Other Land Cover Types

The General Plan Update Area is located in the foothills of the San Bernardino Mountains, is bounded by the San Bernardino National Forest, and is located in the valley and upland areas of San Bernardino County. Numerous streams, creeks (e.g., Lytle Creek), and channels run through the City, including the Santa Ana River (SAR). The General Plan Update Area has been largely disturbed by development and agricultural uses; however, it does contain a variety of

vegetation communities and land cover types. Table 3.4-1, *Vegetation Communities and Land Cover Types*, lists the general vegetation communities and approximate acreages. Figure 3.4-1, *Vegetation and Land Cover*, depicts the specific vegetation and natural communities within the General Plan Update Area.

**Table 3.4-1 Vegetation Communities and Land Cover Types**

| Vegetation Communities/Land Cover Types | Acres | Description |
|---|---|---|
| Developed and Disturbed Areas | 31,193.9 | Areas mapped as developed include forms of human development that have an impact on native communities, and in some cases a permanent impact that causes a complete loss or conversion of native communities. Developed areas include buildings (residential and commercial) and other infrastructures, some smaller landscaped areas, roads, and paved areas. The developed category additionally includes paved parking areas, driveways, and retention basins associated with development.<br>Areas mapped as disturbed are devoid or mostly devoid of vegetation and contain no buildings or other development. The disturbed designation indicates a location that may be actively maintained to be free of vegetation or that has been compacted to such a degree that vegetation is very sparse. Disturbed areas include dirt roads, off-highway vehicle use, bare soils, concrete, and flood control measures.<br>Many developed and disturbed areas contain non-native species and ornamental species. Developed and disturbed areas occur in the majority of the General Plan Update Area. |
| Chaparral | 4,050.3 | Areas mapped as chaparral vegetation consist of broad-leaved evergreen, medium to tall sclerophyllous shrubs that form a dense cover on steep slopes. Chaparrals are found on the upper slopes at higher elevations with little to no understory growth. Chaparral species present include chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos* sp.), scrub oak (*Quercus dumosa*), ceanothus (Ceanothus sp.), holly-leaved cherry (*Prunus ilicifolia*), and Our Lord's candle (*Yucca whipplei*) with black sage (*Salvia mellifera*) as a co-dominant species at some locations. Chaparral is mostly present in open, natural areas, away from developed locations. This vegetation community occurs mostly in the northern portion of the General Plan Update Area and contains shrubs that are larger than those of the coastal scrub that surrounds this vegetation community. |

**Table 3.4-1 Vegetation Communities and Land Cover Types**

| Vegetation Communities/Land Cover Types | Acres | Description |
|---|---|---|
| Non-native Grassland | 3,343.3 | Areas mapped as non-native grasslands are dominated by a dense to sparse cover of non-native annual grasses. This vegetation community is often associated with numerous species of showy flowered, native annual forbs, especially in years of favorable rainfall. The presence of *Avena* sp., *Bromus* sp., *Erodium* sp., and *Brassica* sp. are common indicators. In some areas, depending on past disturbance and annual rainfall, annual forbs may be the dominant species; however, it is presumed that grasses will soon dominate. These areas also can contain black mustard and few scattered shrubs. This vegetation community occurs throughout the General Plan Update Area. |
| Riversidean Alluvial Fan Sage Scrub | 3,089.8 | Areas mapped as Riversidean alluvial fan sage scrub are associated with alluvial fans of large canyons on the coastal slopes of the Transverse and Peninsular mountain ranges in San Bernardino and Riverside counties. This vegetation community is a typical dominant habitat type for some of the more xeric alluvial drainages and alluvial fans. As a flood-adapted vegetation community, its structure comprises several stages of successional growth at any given time. The flood adaptative properties of the community, its tendency to support unique suites of plant and animal life, and the general rarity of intact alluvial systems have resulted in the community being considered sensitive. Within the General Plan Update Area, this vegetation community is dominated by California buckwheat and hairy yerba santa (*Eriodictyon trichocalyx*). Associated plant species include small flowered fiddleneck (*Amsinckia menziesii*) and California croton (*Croton californicus*). Riversidean alluvial fan sage scrub occurs in the Santa Ana floodplain in the southern portion of the General Plan Update Area and is mapped in certain stream courses of the General Plan Update Area. These areas vary from being unvegetated to containing alluvial fan sage scrub species, such as scale broom (*Lepidospartum squamatum*). In addition to scale broom, this vegetation community is co-dominated by a variety of species, including California buckwheat, Our Lord's candle, and birch leaf mountain mahogany (*Cercocarpus betuloides*). Other species observed throughout this vegetation community include mule fat, deerweed, white sage, and laurel sumac. The substrate of alluvial fan sage scrub areas is sandy with a large number of cobbles and boulders. |

**Table 3.4-1 Vegetation Communities and Land Cover Types**

| Vegetation Communities/Land Cover Types | Acres | Description |
|---|---|---|
| Coastal Scrub | 2,489.0 | Areas mapped as coastal scrub vegetation consist of drought deciduous low-growing shrubs on gentle to steep slopes below 3,000 feet in elevation. The dominant species for this vegetation type include California sagebrush (*Artemisia californica*), California brittlebush (*Encelia californica*), California buckwheat (*Eriogonum fasciculatum*), deerweed (*Acmispon glaber*), laurel sumac (*Malosma laurina*), prickly-pear cactus (*Opuntia littoralis*), white sage (*Salvia apiana*), purple sage (*Salvia leucophylla*), black sage, and lemonade berry (*Rhus integrifolia*). The shrub density, species composition, and species percent coverage varies by patch. Coastal scrub areas typically include various levels of cover by non-native vegetation. This vegetation community occurs throughout the foothills in the General Plan Update Area, in small patches and in large contiguous areas. |
| Wetlands and Waters | 332.6 | Areas mapped as wetlands and waters are usually associated with streambeds, drainages, and channels (i.e., Cajon Wash, Lytle Creek, SAR). Wetlands, waters, and channels occur throughout the General Plan Update Area. The channels are mostly concrete-lined; however, some have banks that are lined with riprap. Standing water occurs in some channels; however, others are dry. Golf course water features were also included in this mapping unit. Open Water may be present in some areas mapped as riparian or channel; however, these areas were not mapped as open water. Any open channels that may provide corridors that encourage the movement of wildlife were also included in this classification. |
| Forest and Woodlands | 309.2 | Areas mapped as forest consist of multi-layered vegetation that forms a dense canopy cover that is almost completely closed. These areas may occur in canyon bottoms near streams. Forest communities may include southern coast live oak riparian forest, southern cottonwood willow riparian forest, lower montane coniferous forest, and eucalyptus naturalized forest.<br>Areas mapped as woodland contain multi-layered canopies ranging from open to moderately dense cover and have a tree canopy of at least 20-percent cover. Woodland communities are associated with watercourses and riparian habitats and may include southern sycamore-alder riparian woodland, coast live oak woodland, California walnut woodland, and juniper woodlands. |

**Table 3.4-1 Vegetation Communities and Land Cover Types**

| Vegetation Communities/Land Cover Types | Acres | Description |
|---|---|---|
| | | Forest and woodlands areas occur in the far northern portion of the General Plan Update Area near the open space areas of the mountains. |
| Riparian and Desert Wash | 222.9 | Areas mapped as riparian communities occur along water bodies adaptable to seasonal flooding and may range from a dense canopy of large trees to open, lower growing trees within a sandy wash. Areas mapped as riparian and desert wash occur scattered throughout the General Plan Update Area and are associated with creeks, streambeds, earthen-bottom channels, and certain other depressional features that are subjected to urban runoff. Riparian includes a variety of vegetation communities such as woodland (i.e., coast oak woodland), scrub (i.e., southern willow scrub), thickets (i.e., red willow thicket), and emergent freshwater marsh. Representative riparian species for this vegetation community include mulefat (Baccharis salicifolia), western sycamore (*Platanus racemosa*), arroyo willow (*Salix lasiolepis*), and non-native giant reed (*Arundo donax*). |
| Agriculture | 165.6 | Areas mapped as agriculture include any part of the General Plan Update Area that is under active cultivation, either irrigated or not. Areas mapped as agriculture within the General Plan Update Area include crop fields and orchards. This land cover type occurs in various locations throughout the General Plan Update Area. |
| Barren | 42.5 | Areas mapped as barren are areas devoid of vegetation. This land cover type occurs in a small area in the northwestern portion of the General Plan Update Area. |

Source: Appendix D.

## Sensitive Natural Communities

Sensitive habitat types occur throughout the General Plan Update Area. These are considered sensitive by resource agencies such as USFWS and CDFW due to their scarcity or ability to support state or federally endangered or threatened species of plants and wildlife. ECORP conducted a CNDDB search and recorded nine sensitive natural vegetation communities that have been previously identified and mapped within or near the General Plan Update Area. Five additional communities were identified in the 2005 San Bernardino General Plan Update EIR.

The following sections describe each sensitive natural community under the natural community name identified through CNDDB followed by the comparable CNPS vegetation alliance name, when applicable.

### *Southern Coast Live Oak Riparian Forest/Quercus agrifolia Forest & Woodland Alliance*

Southern Coast Live Oak Riparian Forest/Quercus agrifolia Forest & Woodland Alliance ranges from open to dense and is dominated by coast live oak. It is located in outer floodplains and along streams. Vegetation tends to be herbaceous with little to no understory. Common plants present include mugwort (*Artemisia douglasiana*), California wild rose (*Rosa* californica), Mexican elderberry (*Sambucus mexicana*), and poison oak (*Toxicodendron diversilobum*).

### *Southern Cottonwood Willow Riparian Forest/Populus fremontii – Fraxinus velutina - Salix gooddingii Forest & Woodland Alliance*

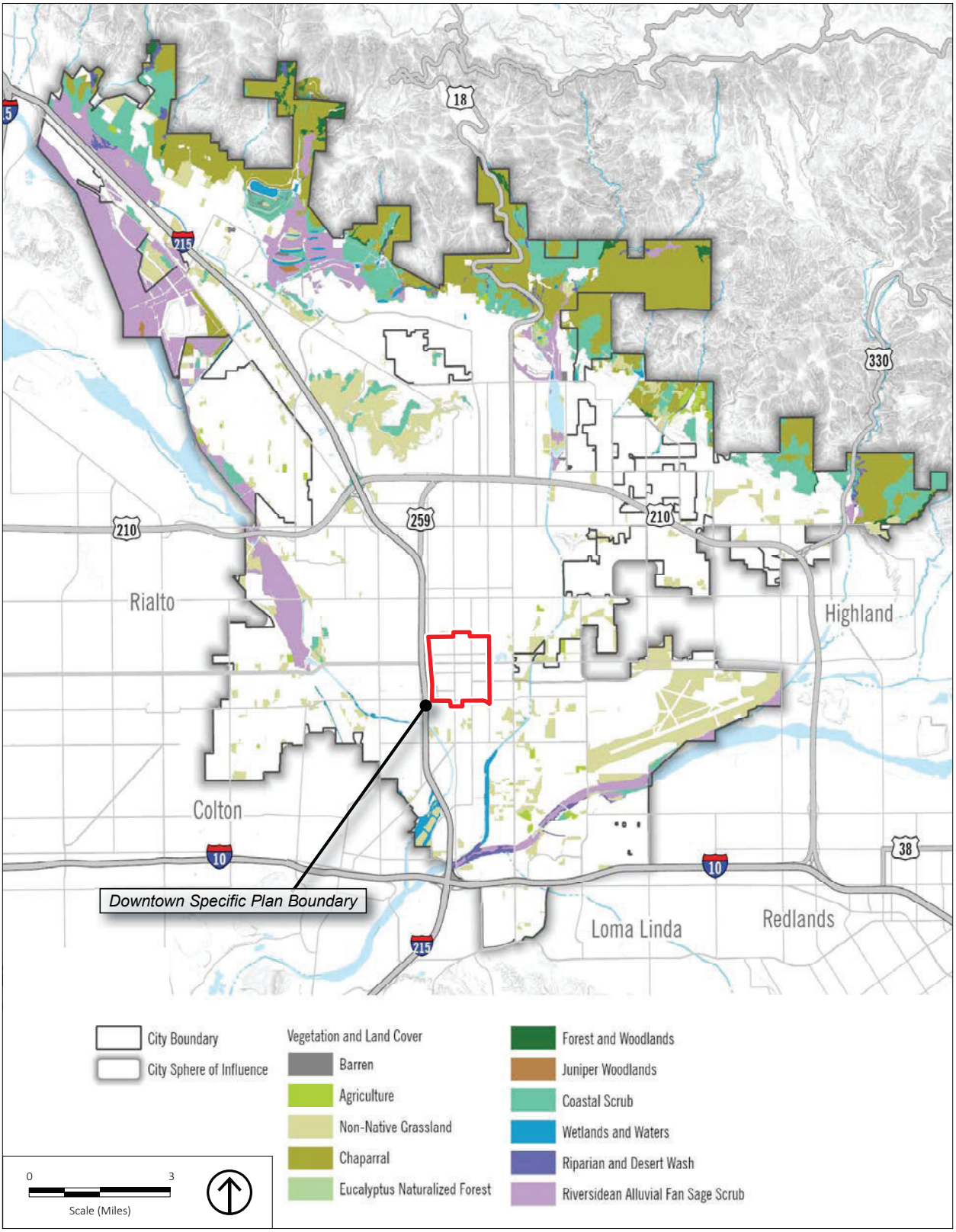
Southern Cottonwood Willow Riparian Forest/Populus fremontii - Fraxinus velutina - Salix gooddingii Forest & Woodland Alliance consists of tall, open, deciduous riparian forest species with Fremont's cottonwood (Populus fremontii), western sycamore, and willows (Salix spp.) as the predominant tree species. It commonly occurs near perennial drainages such as canyon bottoms and along streams.

### *Southern Mixed Riparian Woodland/Salix gooddingii - Salix laevigata Forest & Woodland Alliance*

Southern Mixed Riparian Woodland/*Salix gooddingii - Salix laevigata* Forest & Woodland Alliance is located along streams, waterways, or rivers. Cottonwood (*Populus* spp.), sycamore (*Platanus* spp.), poison oak, and mule fat are common species found within this community. The canopy is open to continuous and the herbaceous layer is variable.

### *Southern Riparian Forest/Salix laevigata Forest & Woodland Alliance*

Southern Riparian Forest/Salix laevigata Forest & Woodland Alliance consist of deciduous trees that require surface water. Willow cottonwood (*Populus* spp.) and western sycamore are dominant trees that form a medium-height canopy. Understory species that are common include mule fat, stinging nettle (*Urtica dioica* ssp. *holosericea*), and wild grape (*Vitis girdiana*). As a riparian forest, the canopy can exceed 100 percent in the upper stratum.




Source: PlaceWorks, CIty of San Bernardino 2026

Figure 3.4-1
**Vegetation and Land Cover**

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### *Southern Riparian Scrub*

Southern Riparian Scrub exists within riparian zones. Unlike southern riparian forests, this community does not have tall riparian trees and instead is dominated by small trees and shrubs. It occurs in areas where flood scouring occurs.

### *Southern Sycamore Alder Riparian Woodland/Platanus racemosa – Quercus agrifolia Woodland Alliance*

Southern Sycamore Alder Riparian Woodland/Platanus racemosa - Quercus agrifolia Woodland Alliance consists of trees less than 35 meters with an intermittent or open canopy. The shrub layer is also open to intermittent while the herbaceous layer is sparse or grassy. Western sycamore makes up about 30 percent of the tree canopy; coast live oak, willow spp. (*Salix* spp.), and Fremont's cottonwood are co-dominant species. Along riparian areas, coast live oak is the dominant cover along with willow spp. and poison oak.

### *Southern Willow Scrub*

Southern Willow Scrub consists of dense, broadleaved, deciduous stands of trees. Stands of trees are dominated by willows (*Salix* spp.)., cottonwood (*Populus* spp.), and western sycamore. This community occurs on alluvium soils. Frequent flooding maintains this community.

### *Riversidean Alluvial Fan Sage Scrub/Lepidospartum squamatum Shrubland Alliance*

Riversidean Alluvial Fan Sage Scrub/*Lepidospartum squamatum* Shrubland Alliance is a Mediterranean shrubland that occurs on the gentle slopes of alluvial fans and in nearby washes. Predominant species within alluvial scrub are drought-deciduous soft-leaved shrubs. Scalebroom is an indicator species and other common species include white sage, redberry (*Rhamnus crocea*), California buckwheat, yerba santa (*Eriodictyon* spp.), mule fat, and mountain mahogany (*Cercocarpus ledifolius*). The slender-horned spineflower (*Dodecahema leptoceras*) and Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*) are two special-status plant species that occur within this community.

### *Southern California Arroyo Chub/Santa Ana Sucker Stream*

Southern California Arroyo Chub/Santa Ana Sucker Stream is characteristic of the habitat in which the two species can be found. These streams have low to moderate moving waters.

### *Needlegrass Grassland/Nassella spp. – Melica spp. Herbaceous Alliance*

Needlegrass Grassland/*Nassella* spp. - *Melica* spp. Herbaceous Alliance consists of herbs that are less than one meter in height and that provide open to continuous coverage. Dominant

species include California melic (*Melica californica*), Torrey's melic grass (*Melica torreyana*), nodding needlegrass (*Nassella cernua*), small flowered needlegrass (*Nassella lepida*), and purple needlegrass (*Nassella pulchra*). Soils are high in clay, loam, sand, or silt.

### *Wildflower Field/Avena spp. – Bromus spp. Herbaceous Semi-Natural Alliance*

Wildflower Field/*Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance are open grasslands that contain annual species. There are dramatic differences in the visual appearance of these communities between years and season to season due to rainfall and temperature. These communities are heavily impacted by grazing. Common grasses include wild oats (*Avena fatua*), soft chess (*Bromus hordeaceus*), ripgut brome (B. *diandrus*), red brome (B. *rubens*), and wild barley (*Hordeum spontaneum*). This community generally occurs on flat plains, gentle hills, and along foothills.

### *White Alder Riparian Forest/Alnus rhombifolia Forest & Woodland Alliance*

White Alder Riparian Forest/*Alnus rhombifolia* Forest & Woodland Alliance consist of tree species such as white alder (*Alnus rhombifolia*), big leaf maple (*Acer macrophyllum*), California incense cedar (*Calocedrus decurrens*), Lawson cypress (*Chamaecyparis lawsoniana*), Oregon ash (Fraxinus latifolia), tanoak (*Notholithocarpus densiflorus*), western sycamore, Fremont's cottonwood, black cottonwood (*Populus trichocarpa*), Douglas fir (*Pseudotsuga menziesii*), valley oak (*Quercus lobata*), and willows. The canopy is open to continuous with a sparse shrub layer and variable herbaceous layer.

### *California Walnut Woodland/Juglans californica Forest & Woodland Alliance*

California Walnut Woodland/*Juglans californica* Forest & Woodland Alliance is found along riparian corridors and hillsides. This woodland consists of tree species such as California black walnut (*Juglans californica*), white alder, California ash (*Fraxinus dipetala*), toyon (*Heteromeles arbutifolia*), coast live oak, valley oak, red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), elder (*Sambucus nigra*), and California bay (*Umbellularia californica*). The canopy is open to continuous with a sparse shrub layer and a sparse or grassy herbaceous layer.

### *Freshwater Seep*

Freshwater Seep communities consist primarily of species such as yerba mansa (*Anemopsis californica*), southern goldenrod (*Solidago confinis*), basin goldenrod (*Solidago spectabilis*), western ragweed (*Ambrosia psilostachya*), soft brome, and wet meadow species. There are generally no trees with the dominant life form being herbs less than a meter tall. Freshwater seep is found within alkaline or saline meadows, marshes, seeps, and springs.

## Special-Status Plants

Special-status plant species include those listed as endangered or threatened, proposed or candidate species for listing by the USFWS or CDFW, species tracked by the CNPS, and those identified as of greatest conservation need. There are 72 special-status plant species potentially occurring in the vicinity of the General Plan Update Area.

Figure 3.4-2, *Special-Status Plants*, shows the distribution of known special-status plant species occurrences within the General Plan Update Area. Figure 3.4-3, *Critical Habitat*, shows the critical habitat present within the General Plan Update Area.

The following sections provide additional details on plant species listed under the federal or California Endangered Species Acts (ESAs).

### *Ash-Grey Paintbrush*

Ash-grey paintbrush (*Castilleja cinerea*) is a federally listed threatened species. The CNPS rank is 1B.2. It is a perennial herb that is hemiparasitic and blooms from June through August. It can be found in a variety of habitats such as Mojavean desert scrub, meadows and seeps, and pebble plain. No historic or recent CNDDB occurrences are documented within 5 miles of the General Plan Update Area.

Critical habitat for this species was finalized in a 2007 final rule. Critical habitat exists within 24 units, primarily throughout the San Bernardino National Forest, throughout San Bernardino County. A total of 1,769 acres is designated as critical habitat. No critical habitat occurs within the General Plan Update Area.

### *Gambel's Water Cress*

Gambel's water cress (*Nasturtium gambelii*) is a federally listed endangered and state-listed threatened species. The CNPS rank is 1B.1. It is a perennial rhizomatous herb that blooms from April through October. It prefers marshes and swamps that are freshwater or brackish. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1935.

### *Marsh Sandwort*

Marsh sandwort (*Arenaria paludicola*) is a federally listed endangered and state-listed endangered species. The CNPS rank is 1B.1. It is a perennial stoloniferous herb, meaning it has runners or horizontal connections that create new individuals. It blooms from May through August. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1899.

### *Nevin's Barberry*

Nevin's barberry (*Berberis nevinii*) is a federally listed endangered and state-listed endangered species. The CNPS rank is 1B.1. It is a perennial evergreen shrub that blooms from March through June but will occasionally start blooming in February. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2009.

Critical habitat for this species was finalized in a 2008 final rule. Critical habitat occurs within the San Bernardino National Forest. No critical habitat occurs within the General Plan Update Area.

### *Salt Marsh Bird's Beak*

Salt marsh bird's beak (*Chloropyron maritimum* ssp. *maritimum*) is a federally listed endangered and state-listed endangered species. It has a CNPS rank of 1B.2. It is an annual *hemiparasitic* herb that blooms from May through October and sometimes into November. It prefers coastal dunes and marshes and swamps. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1888.

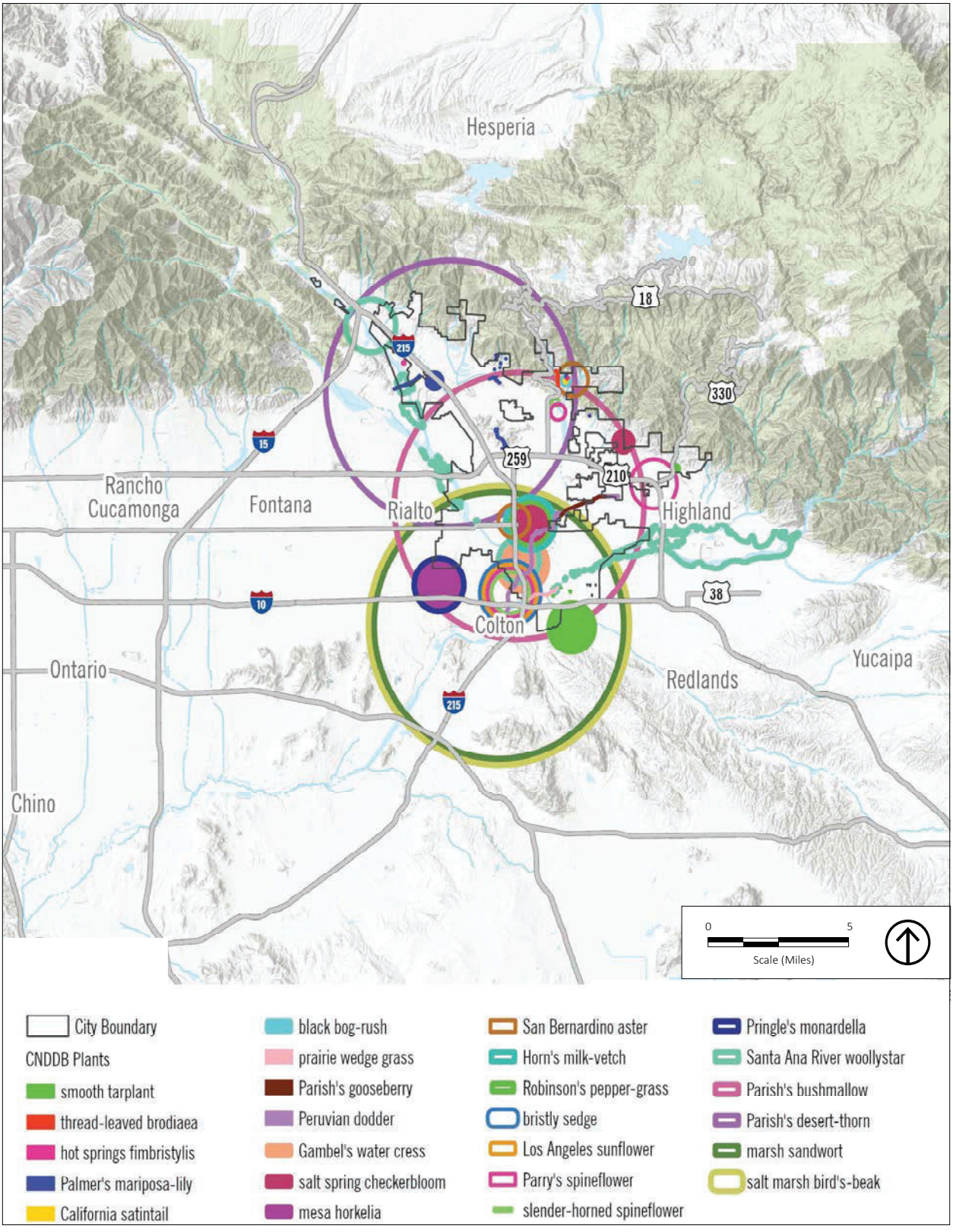
### *San Diego Ambrosia*

San Diego ambrosia (*Ambrosia pumila*) is a federally listed endangered species. The CNPS rank is 1B.1. It is a perennial rhizomatous herb that blooms from April through October. It prefers sandy loam or clay soils and is often found in disturbed areas. No historic or recent CNDDB occurrences are documented within 5 miles of the General Plan Update Area.

Critical habitat for this species was finalized in a final rule in 2010. Unit 1 (approximately 112 acres) for this critical habitat occurs within the Santa Ana River Watershed and within western Riverside County. No designated critical habitat occurs within San Bernardino County or within the General Plan Update Area.

### *Santa Ana River Woollystar*

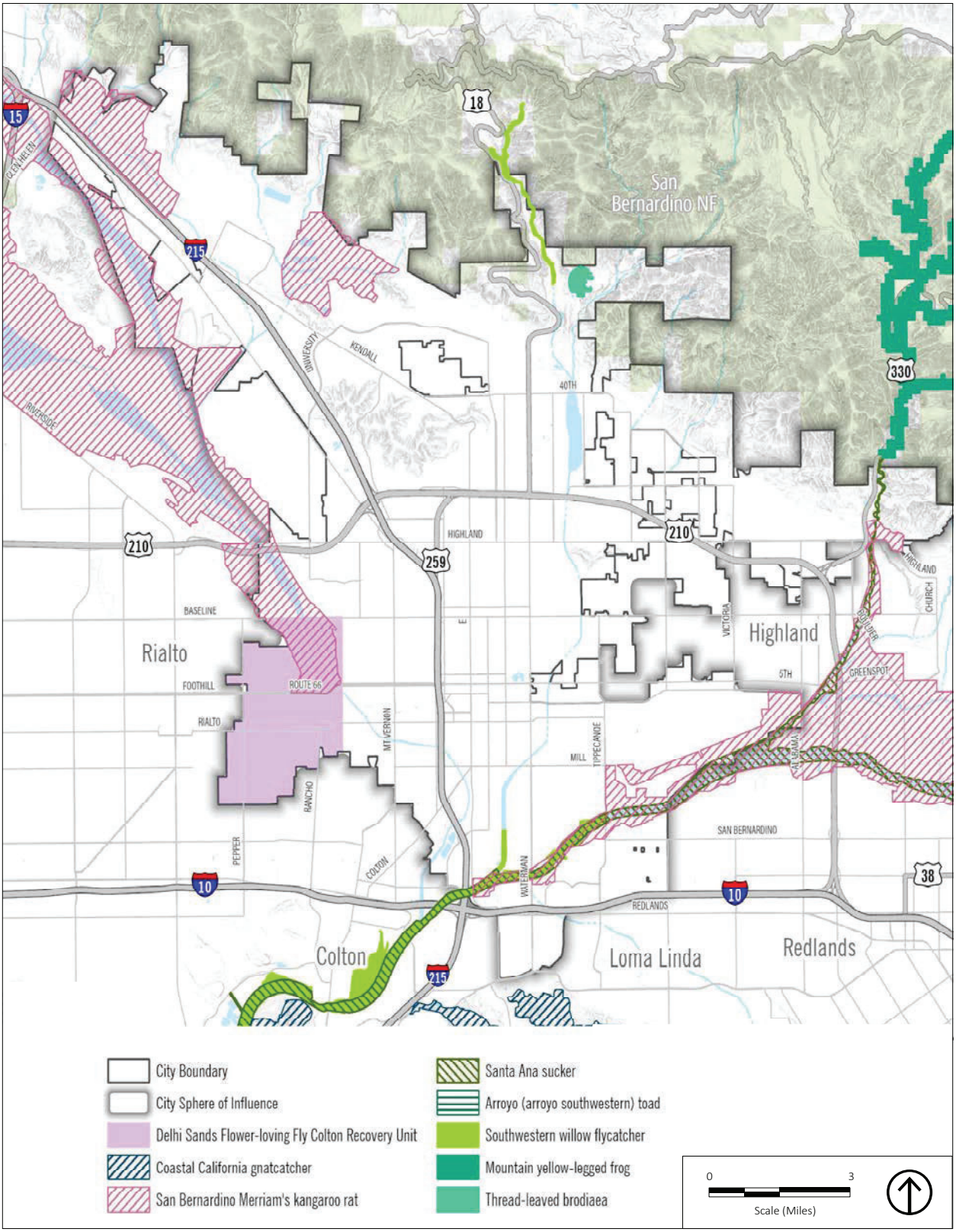
Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*) is a federally endangered and state-endangered species. It has a CNPS rank of 1B.1. It is a perennial herb that blooms from April through September. It can be found in sandy or gravel-like soil within chaparral and alluvial fan habitat. Many sightings recorded in the CNDDB occur within 5 miles of the General Plan Update Area, the most recent occurring in 2024.




Source: CA Department of Fish and Wildlife, PlaceWorks, and City of San Bernardino 2026

Figure 3.4-2
**Special-Status Plants**

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Source: PlaceWorks and City of San Bernardino 2026

Figure 3.4-3
**Critical Habitat**

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### *Slender-Horned Spineflower*

Slender-horned spineflower (*Dodecahema leptoceras*) is a federally endangered and state-endangered species. It has a CNPS rank of 1B.1. It is an annual herb that blooms from April through June and is found in sandy soil within chaparral, cismontane woodland, and alluvial fan habitat. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2021.

### *Thread-Leaved Brodiaea*

Thread-leaved brodiaea (*Brodiaea filifolia*) is a federally threatened and state-endangered species and has a CNPS rank of 1B.1. It is a perennial bulbiferous herb that produces several blue to red-purple flowers on a leafless stalk that blooms from March through June. Its habitat is in vernal pools and wetlands, but it can also occur in non-wetlands. Urbanization is the most significant threat to this species. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2005.

#### ***Critical Habitat***

Critical habitat for thread-leaved brodiaea was revised in 2011. This critical habitat is contained within Unit 2, in Arrowhead Hot Springs, and does exist within the General Plan Update Area. This 61-acre area is in the northeastern area of the City limits (see Figure 3.4-3).

## Special-Status Wildlife

Special-status wildlife species include those listed as endangered or threatened, proposed or candidate species under the USFWS or CDFW, or designated as CDFW Fully Protected or Species of Special Concern (SSC). There are 54 special-status wildlife species with potential to occur in the vicinity of the General Plan Update Area.

Figure 3.4-4, *Special Status Wildlife*, illustrates the distribution of special-status wildlife species within the General Plan Update Area. Critical habitat for six wildlife species occurs within the General Plan Update Area (see Figure 3.4-3).

The following sections describe wildlife species listed or proposed for listing under the federal or California Endangered Species Acts.

### *Arroyo Toad*

Arroyo toad (*Anaxyrus californicus*) is a federally endangered species. It is found in low-gradient streams and rivers that have intermittent and perennial flows. This toad is small, stocky, and warty; it is 2 to 3 inches in length. Its color is a light olive green, gray, or light brown with a light “V” shaped stripe across the head and eyelids and spots. Its belly is white or buff colored,

generally without spots. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2007.

Critical habitat for Arroyo toad was revised in February 2011. Portions of the designated critical habitat occur within the General Plan Update Area. Unit 20 (Upper SAR Basin/Cajon Wash; 1,775 acres) and Unit 22 (Upper Mojave River Basin; 2,267 acres) are two units within San Bernardino County; the former occurs within the General Plan Update Area.

### *Bald Eagle*

Bald eagle (*Haliaeetus leucocephalus*) is a state-endangered and fully protected species. It is also listed as sensitive under the U.S. Forest Service (USFS) and Bureau of Land Management (BLM). Bald eagles have white heads and tails with dark brown bodies and wings. They can be found in forested areas and prefer tall, dense stands of trees for nesting. They often avoid areas of high human activity. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2006.

### *Burrowing Owl*

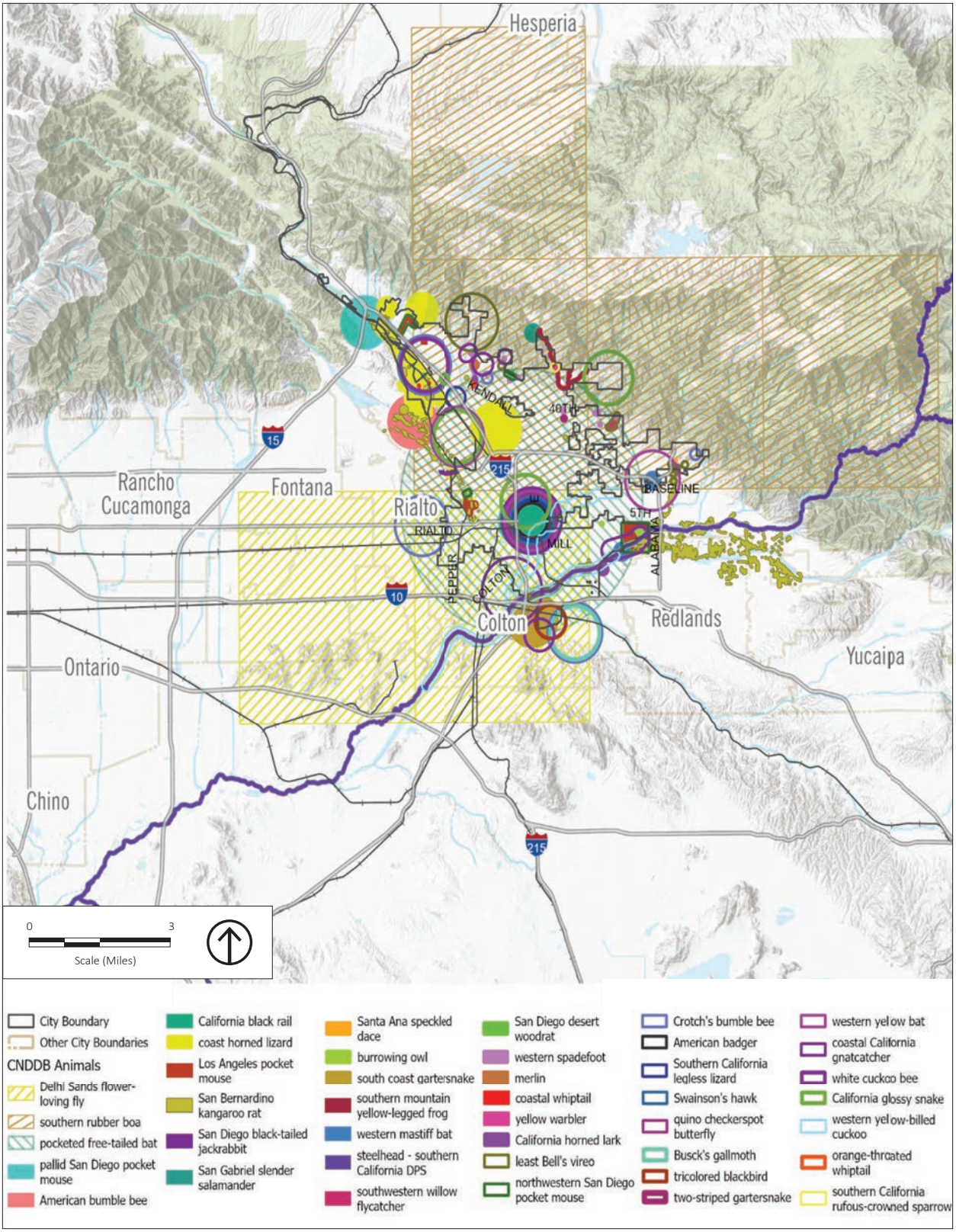
Burrowing owl (*Athene cunicularia*) is a state candidate endangered species. It is also listed as an SSC under CDFW, a BCC under USFWS, and sensitive under BLM. Burrowing owls are small, sandy colored owls with bright-yellow eyes. This species can be found in grasslands and shrublands and prefers open, treeless areas with low and sparse vegetation. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2007.

### *California Black Rail*

California black rail (*Laterallus jamaicensis coturniculus*) is a state-threatened and fully protected species. It is also listed as sensitive under the BLM. The California black rail is a dark grey bird with a brown nape and white speckles on its wings. This species inhabits tidal salt marshes and freshwater marshes in dense vegetation. Due to its preferred habitat, camouflage, and behavior, this species is incredibly elusive. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1919.

### *California Condor*

California condor (*Gymnogyps californianus*) is a state and federally endangered species. This species has white coloration along the shoulders to the tip of the wings that can be seen while in flight. California condors require large trees or snags for roosting and prefer rock outcrops and cliffs for nesting. No identified sightings of this species in the CNDDB occur within 5 miles of the General Plan Update Area. Critical habitat for this species was designated in 1976 and revised in 1977. Critical habitat does not occur within San Bernardino County or within the General Plan Update Area.




Source: CA Depa tment of Fish a d Wildlife, Pla eWorks, City of Sa Berna dino 2026

Figure 3.4-4
**Sensitive-Status Wildlife**

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### *California Red-Legged Frog*

California red-legged frog (*Rana draytonii*) is a federally threatened species. It is also listed as an SSC under CDFW. It is the largest native frog in the western U.S. ranging from 1.75 to 5.25 inches (snout to vent). Color, from above, can range from brown, gray, olive, red, to orange. Dark specks of spots occur along the back. From the eye to the hip, on both sides of the back, is a dorsolateral fold or ridge. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1982. Critical habitat for this species was finalized in 2010. No critical habitat occurs within the General Plan Update Area.

### *California Spotted Owl*

California spotted owl (*Strix occidentalis occidentalis*) is a federally proposed threatened species. It is also a BCC under USFWS, an SSC under CDFW, and sensitive under BLM and USFS. It is a medium-sized brown owl with white spots on its head and chest and a barred tail. It has dark brown eyes surrounded by large facial disks. California spotted owls use mature forests with dense, multi-layered, diverse, high closure canopies. No identified sightings of this species in the CNDDB occur within 5 miles of the General Plan Update Area.

### *Coastal California Gnatcatcher*

Coastal California gnatcatcher (*Polioptila californica californica*) is a federally threatened species. It is also an SSC under CDFW. It is a small blue-gray songbird that has dark blue gray feathers on its back and grayish white on its underside. The wings have a brown color and the tail is mostly black with white outer tail feathers. They have a white ring around the eyes. They prefer coastal sage scrub and desert scrub. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2024.

The USFWS designated Critical Habitat for coastal California gnatcatcher in 2000 and revised the designated Critical Habitat in 2007. Critical habitat exists within San Bernardino County for the coastal California gnatcatcher; however, critical habitat does not occur within the General Plan Update Area. Critical habitat occurs within the immediate vicinity of the General Plan Update Area and near designated critical habitat for the southwestern willow flycatcher (*Empidonax traillii extimus*) and Santa Ana sucker (*Catostomus santaanae*). Unit 10 (southern San Bernardino County and adjacent to the Western Riverside County Multiple Species HCP planning area) occurs within San Bernardino County (5,757 acres).

### *Crotch's Bumble Bee*

Crotch's bumble bee (*Bombus crotchii*) is a state candidate endangered species. This species inhabits grasslands and shrublands and requires a hot, dry environment. Milkweed (*Asclepias* sp.) is a strong food source. It can be distinguished by its square-shaped face and rounded ankle

on the midleg with black and yellow coloration. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2024.

### *Delhi Sands Flower-Loving Fly*

Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*) is a federally endangered species. A relatively large fly species, it measures 0.6 to 1.6 inches long. It is orange, brown, and black with dark brown oval spots on the upper abdomen. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2013.

### *Least Bell's Vireo*

Least bell's vireo (*Vireo bellii pusillus*) is a state and federally endangered species. This species prefers dense shrub habitats including scrub oak, riverine scrub, saltcedar stands, and coastal chaparral. The Least bell's vireo is gray-brown from above and white from below. It has a faint outline around the eyes. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2016. Critical habitat for this species was designated in 1994 within San Bernardino County. No critical habitat occurs within the General Plan Update Area.

### *Monarch Butterfly*

Monarch butterfly (*Danaus plexippus* pop. 1) is a federally proposed threatened species. It is also sensitive under USFS. It has orange wings with black and white markings and a black body with small white spots. This species roosts in wind-protected tree groves from Northern Mendocino to Baja California. Milkweed is essential for the larvae of this species. No identified sightings of this species in the CNDDB occur within 5 miles of the General Plan Update Area. USFWS proposed critical habitat for this species in 2024 (89 FR 100662 100716). No proposed critical habitat occurs within the General Plan Update Area.

### *Quino Checkerspot Butterfly*

Quino checkerspot butterfly (*Euphydryas editha quino*) is a federally endangered species. Orange, black, and white arranged in a checkerboard pattern is characteristic of this species. It has a black body with orange antennae. This species requires specific host plants. Host plants include dwarf plantain (*Plantago erecta*), white snapdragon (*Anterrhinum coluterianum*), woolly plantain (*Plantago patagonica*), and Chinese houses (*Collinsia concolor*). The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1958.

### *Riverside Fairy Shrimp*

Riverside fairy shrimp (*Streptocephalus woottoni*) is a federally endangered species. This species is adapted to vernal pool habitats and has a life cycle that can be three to four months long to allow for life in these seasonal habitats. Eggs are covered in a thick shell to prevent desiccation.

No identified sightings of this species in the CNDDB occur within 5 miles of the General Plan Update Area. USFWS designated Critical Habitat for Riverside fairy shrimp in 2001 and revised the designation in 2012. No critical habitat occurs within the General Plan Update Area.

### *San Bernardino Kangaroo Rat*

San Bernardino kangaroo rat (*Dipodomys merriami parvus*) is a state and federally endangered species. It is also an SSC under CDFW. The San Bernardino kangaroo rat is the smallest kangaroo rat in the U.S. with four toes. It has faintly yellow tints to an overall sandy brown upper coat, and a white underpart. The tail has a white side-stripe and tuft at the end. This species primarily occurs in alluvial fan sage scrub and can occur throughout San Bernardino County. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2023. Critical habitat for San Bernardino kangaroo rat occurs throughout San Bernardino County and within the General Plan Update Area (Figure 3.4-3). Unit 1 (Santa Ana Wash; 3,624 acres) and Unit 2 (Lytle/Cajon Creek Wash; 4,686 acres) occur within the County and within the General Plan Update Area.

### *Santa Ana Speckled Dace*

Santa Ana speckled dace (*Rhinichthys gabrielino*) is a federally proposed threatened species. It is also an SSC under CDFW and sensitive under USFS. It is dusky yellow to olive in color with distinctive dark speckles on the upper and sides of the body. This species is found in perennial streams with sand, gravel, or cobble substrates. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2000.

### *Santa Ana Sucker*

Santa Ana sucker (*Catostomus santaanae*) is a federally threatened species. It is also an SSC under CDFW. The largest recorded size was about 9.8 inches; this is generally a small fish. It is a grey to dark grey fish with dark spots. Its underside is lighter than its sides. It is characterized by the orientation of its mouthparts in a downward direction. It prefers clear, small to medium-sized streams with gravel and rock substrates. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2005.

Critical habitat for Santa Ana sucker occurs within the General Plan Update Area (Figure 3.4-3). Units 1A (Upper SAR; 1,559 acres) and 1B (SAR; 4,771 acres) occur within San Bernardino County; the former occurs within the City limits; however, the City is not known to be currently occupied by the species.

### *Southern Mountain Yellow-Legged Frog*

Southern mountain yellow-legged frog (*Rana muscosa*) is a state and federally endangered species. It is also a sensitive species under USFS. It is a moderate-sized ranid frog; the females

are slightly larger than the males. Adult coloration varies. This species is endemic to the southern Sierra Nevada. It can occur in mid- to high-elevation aquatic habitats. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2022. Critical habitat is designated within San Bernardino County but not within the General Plan Update Area (Figure 3.4-3). The critical habitat occurs immediately outside the City limits and overlaps with Santa Ana sucker critical habitat.

### *Southern Rubber Boa*

Southern rubber boa (*Charina umbratical*) is a state-threatened species. It is also a sensitive species under USFS. The rubber boa is smooth and shiny with color varying from olive green to reddish brown, to tan or dark brown. Occurring only in coniferous riparian forests, it prefers damp woodland and grassy meadows. This species occurs from sea level to 9,200 feet. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2020.

### *Southwestern Willow Flycatcher*

Southwestern willow flycatcher (*Empidonax traillii extimus*) is a state and federally endangered species. This flycatcher has a grayish green back and wings, white throat, gray olive breast and pale-yellow belly. During its breeding season, it can be found near riparian forests. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2007. Critical habitat for the Southwestern willow flycatcher was designated in 2013 throughout San Bernardino County (USFWS 2013). A Santa Ana Management Unit encompasses the headwaters and tributaries of the SAR. Designations throughout the county include Waterman Creek (3.2 miles), Bear Creek (9.2 miles), San Timoteo Creek (2.6 miles), Mill Creek (12 miles), and Oak Glen Creek (2.9 miles). A Mojave Management Unit includes Deep Creek (12.5 miles) in San Bernardino County. The General Plan Update Area is located within designated critical habitat for the southwestern willow flycatcher (see Figure 3.4-3).

### *Steelhead-Southern California Distinct Population Segment*

Steelhead-Southern California Distinct Population Segment (*Oncorhynchus mykiss irideus* pop. 10) is a federally endangered species and a state candidate endangered species. Adults are silver with pink colored cheeks, green backs, and silver, white, or yellow sides and belly. There are black spots on the tail, adipose fin, dorsal fin, and back. They are found in slower moving waters at depths that range from 6 to 24 inches. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1950.

### *Stephens' Kangaroo Rat*

Stephens' kangaroo rat (*Dipodomys stephensi*) is a federally threatened and state threatened species. It can be found in arid and semi-arid habitats. Stephens' kangaroo rats have tails that

can be twice as long as the body. They have light brown fur that is lighter on the legs and along the ventral surface. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1989.

### *Swainson's Hawk*

Swainson's hawk (*Buteo swainsoni*) is a state threatened species. It is also a BCC under USFWS and a sensitive species under BLM. This hawk is medium sized with longer, pointed wings that curve upward in flight. They can be found around the riparian systems but also can be found in agricultural field and pastures. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1889.

### *Tricolored Blackbird*

Tricolored blackbird (*Agelaius tricolor*) is a state threatened species and an SSC. It is also a BCC under USFWS and a sensitive species under BLM. The tricolored blackbird is a medium-sized passerine. Sexually dimorphic, the males are typically larger and have black with bright red and white plumage on the shoulder of the wings while females are brown black in plumage with distinct gray streaks, and a somewhat white chin and throat. They can be found in grasslands, woodlands, or agricultural croplands. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1950.

### *Western Pond Turtle*

Western pond turtle (*Emys marmorata*) is a federally proposed threatened species. It is also an SSC under CDFW and sensitive under BLM and USFS. The upper shell of western pond turtles ranges from brown to black with lighter marbling visible up close. The head and legs are dark, sometimes with yellow markings. This species occurs in small lakes and ponds, marshes, creeks, and reservoirs; upland habitat is necessary for breeding. No identified sightings of this species in the CNDDB occur within 5 miles of the General Plan Update Area.

### *Western Spadefoot*

Western spadefoot (*Spea hammondii*) is a federally proposed threatened species. It is an SSC under CDFW and sensitive under BLM. Western spadefoots are small, stout-bodied toads with short legs and warty skin. They have a glossy black spade shaped like a wedge or teardrop on each hind foot. This species is found in open areas with sandy or gravelly soils and requires rain pools which do not contain bullfrogs, fish, or crayfish for breeding. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 2019.

### *Western Yellow-Billed Cuckoo*

Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) is a federally threatened and state endangered species. It is also a BCC under USFWS and sensitive under BLM and USFS. The western yellow-billed cuckoo is a slender bird with a long tail. They have white spots on the underside of their tails as well as under the shoulders. They occur in wooded habitats with a water source and dense vegetation. The most recent CNDDB occurrence within 5 miles of the General Plan Update Area was documented in 1930.

### *Nesting Bird Species*

The General Plan Update Area contains suitable habitat and vegetation communities to support nesting habitat for native migratory and resident bird species, including owls and raptors. Nesting birds and their associated habitats are protected under the MBTA.

## Habitat Conservation Plans

Table 3.4-2, *Habitat Conservation Plans*, lists the HCPs, or conservation plans within or adjacent to the General Plan Update Area. The General Plan Update Area is not located within an NCCP. Figure 3.4-5, *Habitat Conservation Plans*, depicts coverage and proximity of the HCPs to the General Plan Update Area.

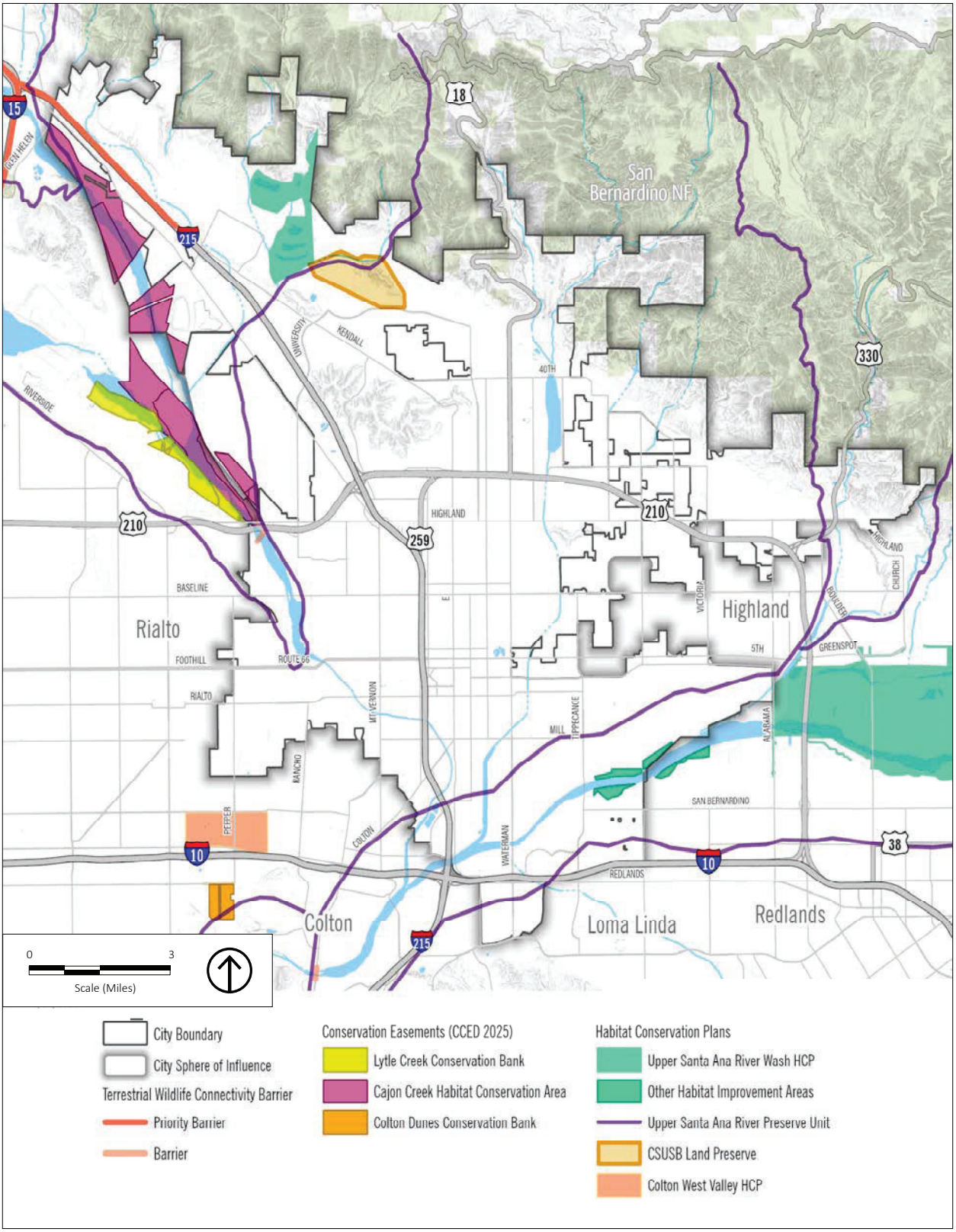
**Table 3.4-2 Habitat Conservation Plans**

| Name | Managing Authority | Size (acres) | Covered Species |
|---|---|---|---|
| Colton West | City of Colton in coordination with USFWS | 416.3 | Delhi Sands flower-loving fly |
| Upper Santa Ana River Wash Habitat Conservation Plan | San Bernardino Valley Water Conservation District | 4,892 | ▪ Santa Ana River woollystar (Eriastrum densifolium ssp. sanctorum)<br>▪ Slender-horned spineflower<br>▪ Arroyo chub (Gila orcuttii)<br>▪ Santa Ana speckled dace<br>▪ Santa Ana sucker<br>▪ Southern mountain yellowlegged frog<br>▪ Western spadefoot<br>▪ Southwestern pond turtle<br>▪ South coast garter snake (*Thamnophis sirtalis* pop. 1)<br>▪ California glossy snake (*Arizona elegans occidentalis*)<br>▪ Coastal California gnatcatcher Cactus wren (*Campylorhynchus brunneicapillus*)<br>▪ Southwestern willow flycatcher<br>▪ Least Bell's vireo<br>▪ Tricolored blackbird<br>▪ Western yellow-billed cuckoo<br>▪ Yellow-breasted chat (*Icteria virens*)<br>▪ Burrowing owl<br>▪ Los Angeles pocket mouse (*Perognathus longimembris brevinasus*)<br>▪ San Bernardino kangaroo rat<br>▪ **Fully Avoided Species:** Delhi Sands flower-loving fly, Arroyo toad |
| Upper Santa Ana River Habitat Conservation Plan | Upper Santa Ana River Sustainable Resources Alliance | 862,987 | |
| San Bernardino County Regional Conservation Investment Strategy | San Bernardino County Transportation Authority | Total: 3,673,413<br><br>Valley region: 311,593 | ▪ Arroyo chub<br>▪ Santa Ana speckled dace<br>▪ Santa Ana sucker<br>▪ Delhi Sands flower-loving fly<br>▪ Western spadefoot<br>▪ California red-legged frog<br>▪ Coast horned lizard (*Phrynosoma blainvillii*) |

| Name | Managing Authority | Size (acres) | Covered Species |
|---|---|---|---|
| | | | ▪ San Bernardino ringneck snake (*Diadophis punctatus*)<br>▪ Western pond turtle<br>▪ Bell's sparrow (*Artemisiospiza belli*)<br>▪ Burrowing owl<br>▪ Los Angeles pocket mouse<br>▪ Mountain lion (*Puma concolor*)<br>▪ San Bernardino kangaroo rat<br>▪ Gambel's water cress<br>▪ Marsh sandwort<br>▪ San Bernardino aster<br>▪ Santa Ana River woollystar<br>▪ Slender-horned spineflower<br>▪ Coastal California gnatcatcher<br>▪ Least Bell's vireo<br>▪ Southwestern willow flycatcher<br>▪ Tricolored blackbird<br>▪ White-tailed kite (*Elanus leucurus*)<br>▪ Western yellow-billed cuckoo |

Source: Appendix D.

Note: Fully Avoided = Implementation of avoidance measures as described in Chapter 5 of the HCP would prevent take of these species.




Source: PlaceWorks and City of San Bernardino 2026

Figure 3.4-5
**Habitat Conservation Plans**

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## Wildlife Movement Corridors and Linkages

The continued protection and establishment of wildlife corridors and linkages is highly important to the City. As development continues and habitat fragments, it becomes harder for wildlife to travel between these fragments of their habitat.

Wildlife corridors are linear landscape elements that provide for wildlife species movement and dispersal between two or more habitats. Wildlife must move (e.g., walk, swim, fly) between these habitat areas daily and seasonally to reach essential resources like food, water, shelter, and breeding sites. Above all, wildlife corridors should be sustained to provide essential connectivity and should not direct wildlife to developed areas or areas that are otherwise devoid of core habitat. Wildlife corridors contribute to population viability by ensuring continual exchange of genes between populations, providing access to adjacent habitat areas for foraging and mating, and providing routes for recolonization of habitat after local displacement or ecological catastrophes (e.g., fires). Wildlife corridors might be bound by development or areas unsuitable for wildlife, but contain enough food, cover, and/or water to facilitate wildlife movement between habitat patches and prevent isolation of populations. Travel routes are landscape features (i.e., ridgelines, drainages, canyons, or riparian areas) that are used by wildlife to gain access to essential resources. Areas adjoining two habitats are often referred to as habitat linkages. Locations that serve as corridors or habitat linkages for some species may serve as core habitat for other species.

Wildlife corridors may become more important in the face of ongoing habitat fragmentation and climate change, both of which are forcing wildlife out of formerly suitable habitat and into new areas. Many wildlife corridors follow major waterways through riparian areas, which provide vegetation cover for shelter as well as food and water resources to sustain wildlife along their migration and prevent predation or conflict with humans. Ridgetops are known to provide movement corridors for a variety of terrestrial wildlife species and also play an important role in raptor migration, providing updrafts to facilitate soaring and gliding, which saves energy in flight, and presenting suitable habitat for raptors to hunt and roost during stopovers. Though Audubon has identified some ridgetops in other parts of the U.S. as Important Bird Areas, none of the ridgetops in the county have been mapped as such.

In 2008, *South Coast Missing Linkages: A Wildlife Network for the South Coast Ecoregion* was published with the support of numerous environmental collaborators. A linkage design was created that recorded key locations and habitats necessary to maintain linkages among geographic areas and for continued support of wildlife species. This project identified the San Gabriel-San Bernardino Connection that includes portions of the City of San Bernardino, the San Bernardino National Forest, and the Angeles National Forest. This connection contains the northern portion of the City of San Bernardino, including the foothills of the San Bernardino Mountains, Lytle Creek, and the Cajon Wash, as shown in Figure 3.4-6, *Habitat Linkages and*

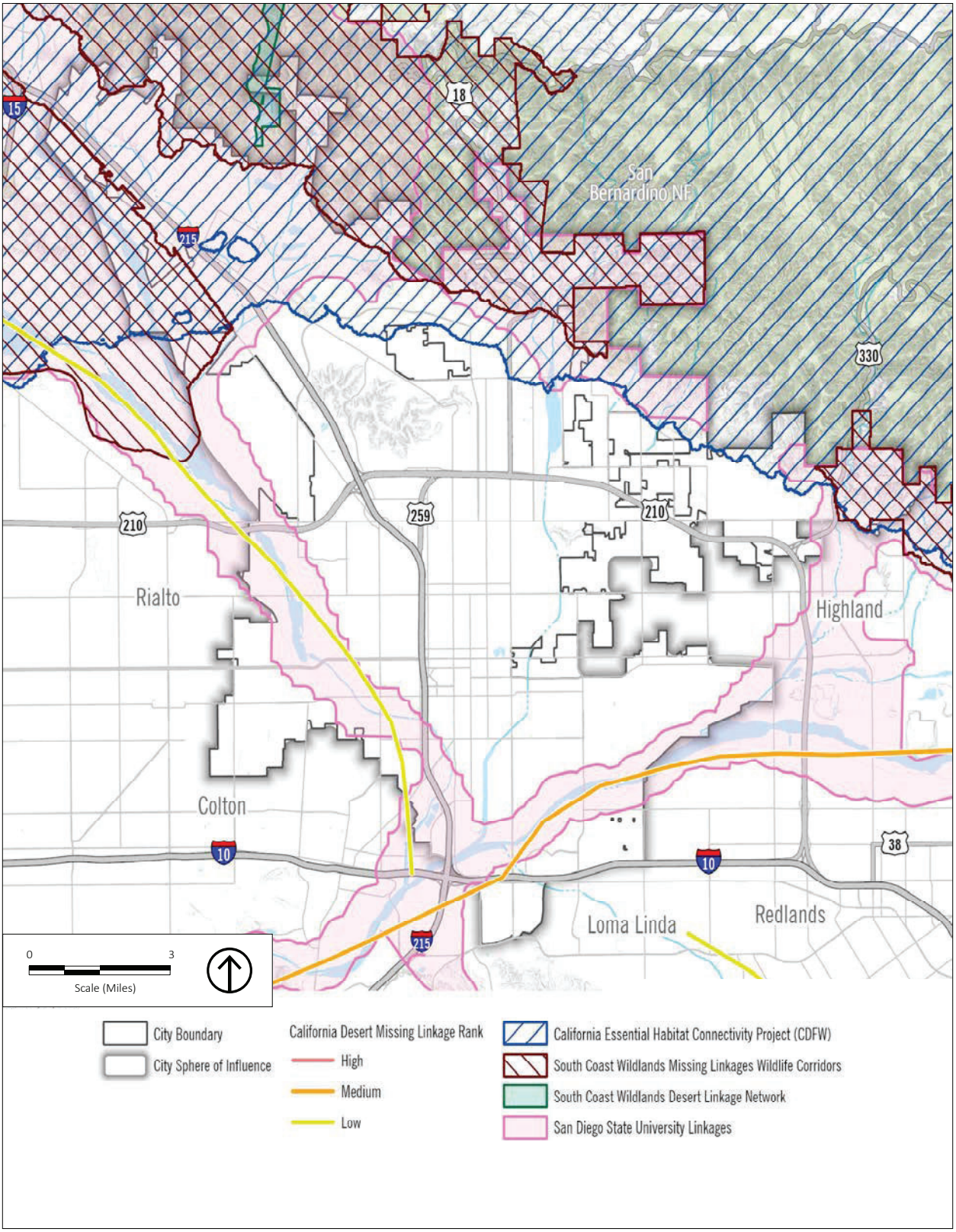
*Wildlife Corridors*. Other tributaries to the Santa Ana River are also directly in contact with an eastern section of the connection.

Several creeks and canyons navigate through the mountains and foothills of the San Bernardino Mountains or adjacent areas, including: Badger Canyon, Cable Creek/Cable Canyon, East Twin Creek/Strawberry Creek, Meyers Canyon, Bailey Canyon, Borea Canyon, Devil Canyon, Little Sand Creek/Canyon, Sand Creek/Sand Canyon, Sycamore Canyon, Cook Canyon, West Twin Creek/Waterman Canyon, Highland Canal, City Creek, Warm Creek, North Fork Canal, Plunge Creek, Ames Canyon, and Zanja Creek. These creeks/canyons in the city form potential wildlife corridors that extend to the San Bernardino National Forest and adjacent land (see Figure 3.4-6).

Linkages also exist along the SAR; however, many portions of these areas have been modified through flood control and other human activities. Portions of the SAR may become an accessible linkage with the protections from the Upper SAR Wash HCP, connecting wildlife to adjacent National Forest land or to existing corridors with high connectivity opportunities. A small portion (less than a square mile) of the east side of the Upper SAR Wash HCP overlaps with land that has a Biogeographic Information and Observation System (BIOS) Connectivity Rank of 3 or 4. A ranking of 4 indicates that there are linkages between conservation planning areas, and a ranking of 3 indicates that there may be opportunities for connectivity that are not currently apparent. The rest of the Upper SAR Wash HCP lies within a BIOS Connectivity Rank of 1, defined as “Limited Connectivity Opportunity.” Depending on land use in future years, including but not limited to mining activity or habitat restoration, and an increase in research on wildlife corridor potential and usage, the ranking of the area is subject to change.

Lytle Creek and Cajon Creek serve as two of the major natural corridors within the General Plan Update Area; however, aggregate extraction activities and nearby development currently limit the use of these corridors. Potential linkages could be created through conserved areas managed by conservation banks along the upper edges of the Cajon Creek, giving access for local fauna to reach secondary corridors and larger habitat areas. To the north of the joining of Lytle Creek Wash and Cajon Creek Wash, a large section of land has a BIOS Connectivity Ranking of 4, meaning there are linkages for fauna to access between essential corridors that are even further north. Several major freeways intersect much of this area, however, and larger scale infrastructure may be necessary to allow for corridor improvement.

The northern portion of the City may function as a local wildlife dispersal, migration, and foraging area. Much of the northern foothills are in proximity to areas with higher probability for linkages and areas that have a BIOS Connectivity Rank of 5, which indicates “Irreplicable and Essential Corridors” and other additional areas with a 4 ranking. Additionally, important drainage occurs throughout the area. These drainages provide movement corridors that help mitigate habitat fragmentation, creating areas where wildlife can access habitat throughout the San Bernardino National Forest.




Source: PlaceWorks and City of San Bernardino 2026

Figure 3.4-6
**Habitat Linkages and Wildlife Corridors**

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Special-status wildlife species that use surrounding linkages include the San Bernardino kangaroo rat, mountain lion, bighorn sheep, American badger, Santa Ana speckled dace, metalmark butterfly, etc. These corridors and linkages also provide for the continued existence of special-status plant species, including the slender-horned spineflower.

## Jurisdictional Aquatic Resources

USACE jurisdiction extends over two broad categories of water: navigable waters of the U.S. and waters of the U.S. Navigable waters of the U.S. are regulated under Section 10 of the Rivers and Harbors Act, and waters of the U.S. are regulated under Section 404 of the CWA. The CWA currently regulates water within the General Plan Update Area. These include lakes, ponds, small streams, some ditches, and adjacent wetlands.

Section 404 of the CWA defines the lateral limits of USACE jurisdiction over non-tidal bodies as extending to the ordinary high-water mark (OHWM) in the absence of adjacent wetlands. When adjacent wetlands are present, CWA jurisdiction extends beyond the OHWM to the limits of the wetland. Wetlands are based on hydrologic characteristics, vegetation, and soil conditions of a site. Non-wetland waters are based on the limits of the OHWM.

Along with USACE jurisdiction, state jurisdiction falls to CDFW. CDFW jurisdiction is in accordance with Fish and Game Code Sections 1600 to 1607 and regulates activities that alter the flow of streams or lakes as well as the bed, channel, or bank of streams and lakes. This regulation is conducted through the issuance of an SAA. CDFW jurisdictional limits are generally delineated by the top of the stream or lake bank and do not include waters under the jurisdiction of the USACE.

The General Plan Update Area contains portions of eight watersheds: Warm Creek- Santa Ana River (Hydrologic Unit Code [HUC] 180702030508), Reche Canyon (HUC 180702030801), East Etiwanda Creek–Santa Ana River (HUC 180702030804), East Twin Creek (HUC 180702030505), Cable Creek (HUC 1180702030304), City Creek (HUC 180702030504), Lower Cajon Wash (HUC 180702030303), and San Timoteo Canyon–San Timoteo Wash (HUC 180702030403).

The SAR, Lytle Creek, City Creek, and East Twin Creek are the main streams that run through the General Plan Update Area, as shown in Figure 3.4-7, *Aquatic Resources*. Three creeks (Lytle Creek, East Twin Creek, and City Creek) that run through portions of the city can be interpreted as having USACE jurisdiction; these streams are generally ephemeral. The northwestern and western boundaries of the city are approximately parallel and encompass portions of Cajon Wash and Lytle Creek Wash. The SAR and these washes follow and traverses the southern and southeastern portions of the city. Numerous channels, basins, and small streams stem from the main SAR tributary; however, they are most concentrated along the northern border of the General Plan Update Area, along the periphery of the developed city center.

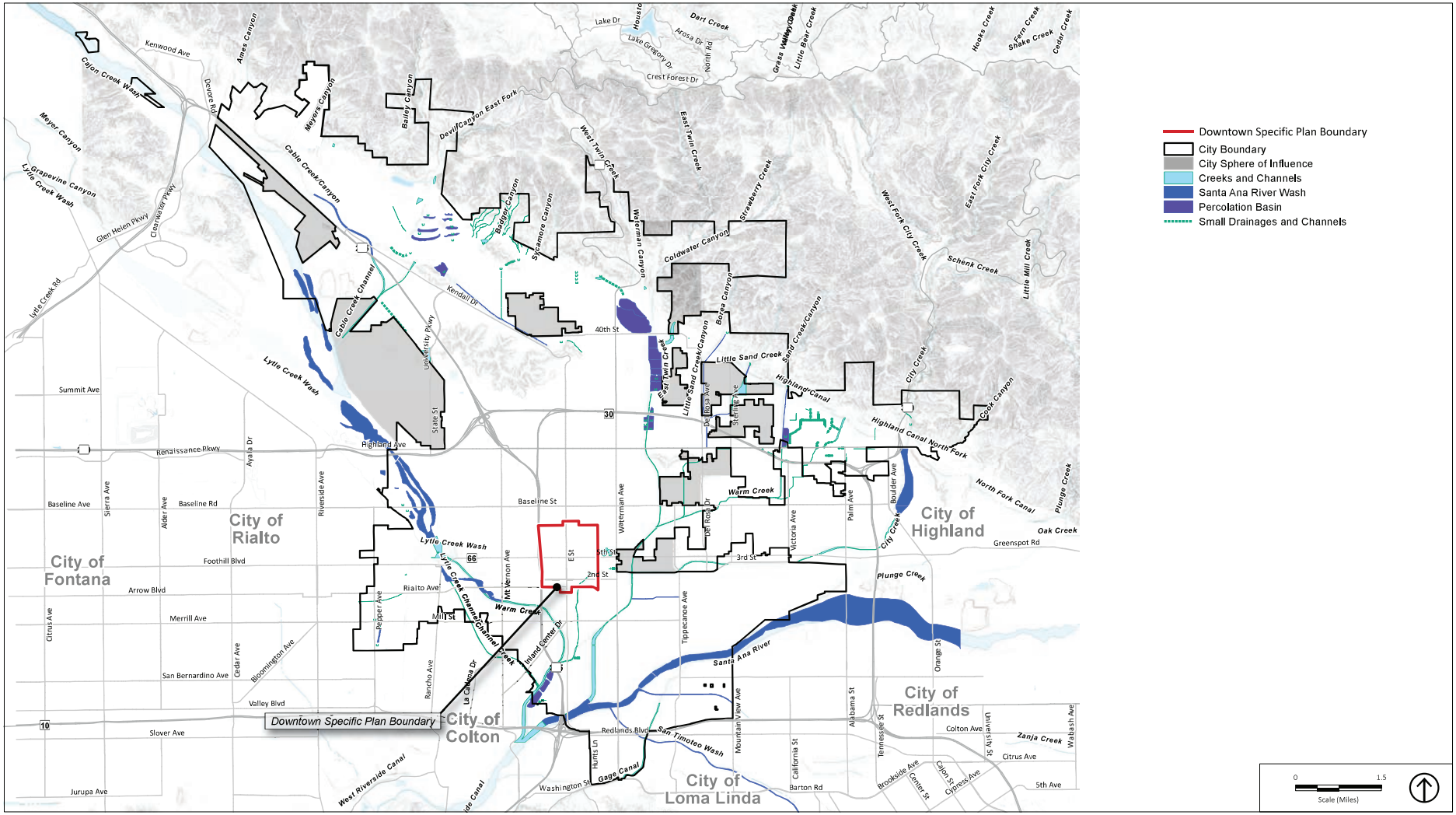
Several blue-line streams flow in canyons through the mountains and foothills of the San Bernardino Mountains from the north including:

- Cable Creek/Cable Canyon
- East Twin Creek/ Strawberry Creek/ Coldwater Canyon
- Meyers Canyon
- Bailey Canyon
- Borea Canyon
- Devil Canyon
- Little Sand Creek/ Little Sand Canyon
- Badger Canyon
- Sand Creek/Sand Canyon
- Sycamore Canyon
- Cook Canyon
- West Twin Creek/Waterman Canyon

Various unnamed canyons, blue-line streams, and drainages also flow from the foothills and drain toward the City. Riparian resources—including wetlands that occur along these drainages—potentially fall under the jurisdiction of the USACE and CDFW. The eastern branch of the State Water Project California Aqueduct traverses the northwestern portion of the City. Several tributaries—including East Twin Creek, Warm Creek, Lytle Creek, and City Creek—flow through urbanized portions of the City as flood control channels and canals. Features that have been modified for flood control occur in developed areas in the northern section of the City, including reservoirs, flood control basins, and percolation basins constructed to receive flow from drainages such as Devil Canyon, Bailey Canyon, West Twin Creek, and East Twin Creek.

A formal study to delineate aquatic resources was not conducted for the majority of the General Plan Update Area as the General Plan Area is too large and programmatic in nature to support project-level delineation of aquatic resources. Formal delineations of jurisdictional waters and wetlands under the Clean Water Act (CWA) would be conducted at the project level when site-specific conditions can be evaluated.

However, as stated above, aquatic features that are potentially under the jurisdiction of the USACE and CDFW have been identified within the General Plan Update Area. An aquatic resources delineation for the approximately 414-acre University Hills project area was conducted in the northern portion of the General Plan Update Area in the foothills of the San Bernardino Mountains. The delineation identified 8 drainage complexes covering 5.33 acres of streambed as potential waters of the State, as well as 4.5 acres of riparian waters of the State. The delineation did not identify waters of the U.S. in the University Hills project area.




Source: City of San Bernardino 2020; University Hills 2025.

Figure 3.4-7
**Aquatic Resources**

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### DOWNTOWN AREA

As shown in Figure 3.4-1, the DTSP Area is predominantly characterized by developed and disturbed land uses, with a small portion in the northwest mapped as non-native grassland. Developed and disturbed areas include buildings, infrastructure, roads, paved surfaces, and areas with little to no vegetation due to disturbance, and typically support non-native and ornamental species. The non-native grassland area is dominated by non-native annual grasses and associated annual forbs, with occasional scattered shrubs.

In addition, as shown in Figures 3.4-6 and 3.4-7, portions of the southeastern DTSP Area are designated as creeks and channels. These mapped features indicate the presence of drainage corridors within the DTSP Area where aquatic resources may occur. Figure 3.4-6 also identifies habitat linkages and wildlife corridors within the DTSP Area, which are associated with creeks and channels, including those located in the southwestern portion of the DTSP Area. The DTSP Area is located within the service areas of mitigation and conservation banks, including the Cajon Creek Conservation Bank, Riverpark Mitigation Bank, and Soquel Canyon Mitigation Bank, as shown in Figure 3.4-5. The DTSP Area does not contain designated critical habitat and is not located within an area covered by an HCP or NCCP.

## 3.4.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form**, includes questions concerning biological resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the project would have a significant effect concerning biological resources if it would:

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

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

## METHODOLOGY

Information on biological resources within the General Plan Update Area was obtained from a search of special-status species databases and a review of pertinent literature, prior environmental documents, and aerial photographs. The biological information obtained from these sources was used to perform a programmatic evaluation of existing biological conditions and identify sensitive biological resources that have potential to occur within the General Plan Update Area.

Databases reviewed for this report includes:

- CDFW California Natural Diversity Database
- Calflora Plant Database
- California Native Plant Society's Electronic Inventory
- USFWS Information for Planning and Consultation (IPaC) System
- USFWS National Wetlands Inventory (NWI)
- USFWS Threatened and Endangered Species Critical Habitat Mapper
- Natural Resources Conservation Service (NRCS) Web Soil Survey
- USGS National Hydrography Dataset (NHD)

Literature reviewed for this report includes:

- San Bernardino General Plan
- San Bernardino General Plan Update and Associated Specific Plans Environmental Impact Report, State Clearinghouse # 2004111132
- South Coast Missing Linkages Project
- Biological Technical Report for the University Hills Project
- Draft San Bernardino County Regional Conservation Investment Strategy
- Upper Santa Ana River (SAR) Wash Habitat Conservation Plan (HCP) Annual Report

In addition, a desktop review of the NWI and NHD was conducted to determine if any blue-line streams or drainages that might potentially fall under the jurisdiction of either federal or state agencies have been recorded within the General Plan Update Area.

## 3.4.4 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Multiple special-status species are known to occur or have the potential to occur within the General Plan Update Area and may be affected by activities in this area, including species associated with grassland, riparian, wetland, oak woodland, and coastal sage scrub habitats, as well as species that may utilize developed or agricultural lands for foraging or movement. The General Plan Update is a legally required long-range planning document that guides future growth and development throughout the City. By its nature, the General Plan Update facilitates urban expansion and infrastructure improvements Because the General Plan Update provides the framework for future development, and land use changes across the General Plan Update Area, future development facilitated by the General Plan Update has the potential to result in the direct loss or degradation of suitable habitat, disturbance or mortality of special-status species, and interference with wildlife movement or breeding activities, even with compliance with existing regulatory programs.

The General Plan Update includes policies (see Table 3.4-3, *Biological Resources: Proposed General Plan Update Policies*) designed to minimize impacts on biological resources. Due to the broad scope and nature of the General Plan Update, impacts on biological resources could still occur. However, policies listed in Table 3.4-3 are written to anticipate and address future biological impacts from the General Plan Update. Specifically, Policy OSC-2.1 subjects all proposed discretionary and public-initiated land uses or projects in sensitive areas depicted in Figure 3.4-8, *Consolidated Biological Resources Map*, to enhanced environmental review. Policy OSC-2.1 also requires applicants to submit a report prepared by qualified professionals, identify mitigation measures, and define a program for monitoring that addresses future projects' impact on sensitive species and habitat. Although potential impacts from future development under the General Plan Update may occur, the General Plan Update also points out where these potential impacts may occur and includes policies to address such impacts.

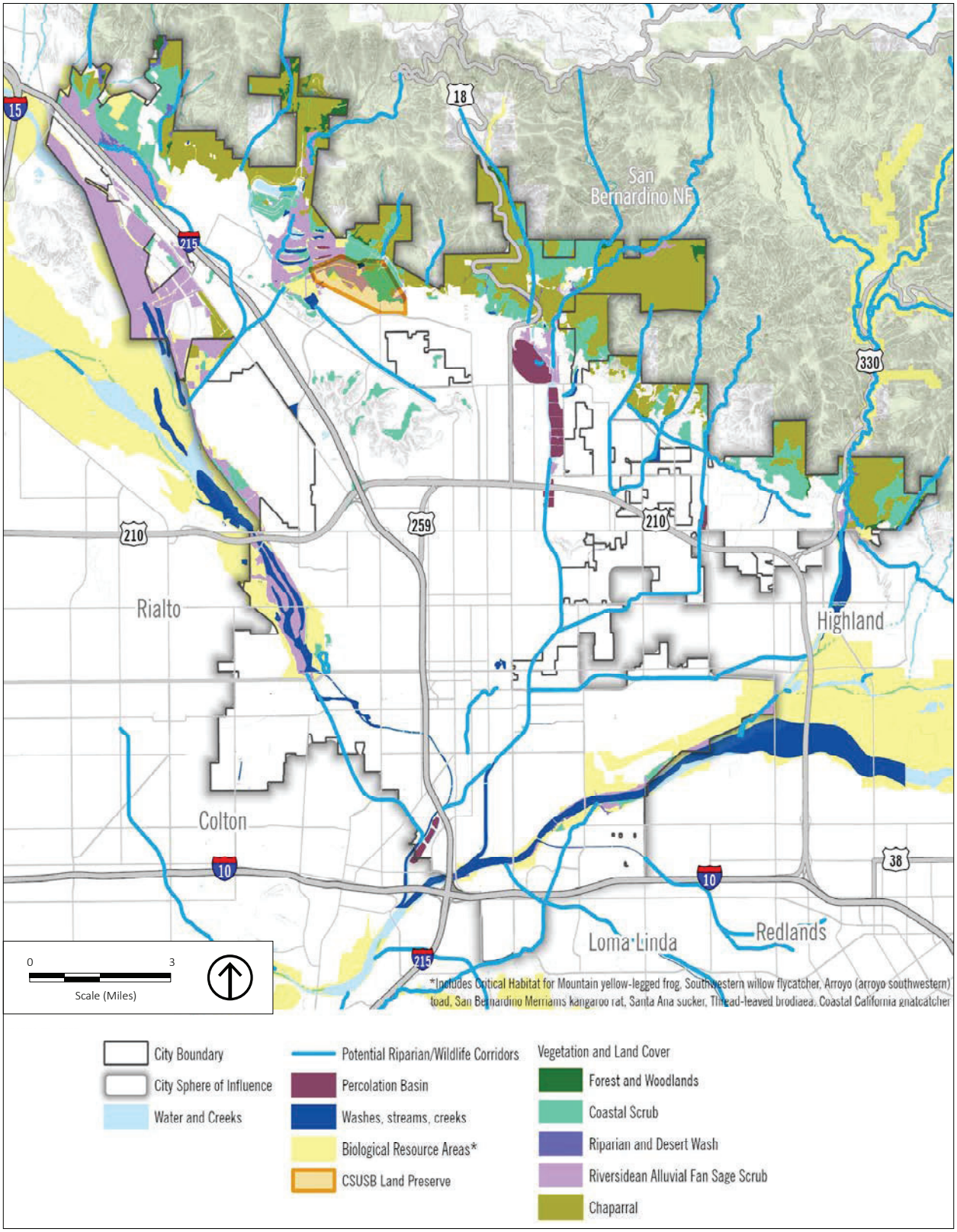
### Table 3.4-3 Biological Resources: Proposed General Plan Update Policies

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-1.1 | **Natural terrain.** Preserve the integrity of natural features of the city, including its hillsides, canyons, and ridgelines that serve to provide viable habitat for the biological resources that inhabit them. |
| OSC-2.1* | **Enhanced project review**. Subject all proposed discretionary and public-initiated land uses or projects in sensitive areas depicted on **Figure OSC-6** to enhanced environmental review. Applicants shall:<br>▪ Submit a report prepared by qualified professionals that addresses the proposed project's impact on sensitive species and habitat.<br>▪ Identify mitigation measures necessary to eliminate significant adverse impacts to sensitive biological species and habitats.<br>▪ Define a program for monitoring, evaluating the effectiveness of, and ensuring the adequacy of the specified mitigation measures.<br>▪ Consider and discuss restoration of local habitats and rewilding opportunities. |
| OSC-2.2 | **Natural vegetation conservation.** Maintain and conserve mature native trees, natural vegetation, stands of established trees, and other vegetation features for ecosystem, aesthetic, and water conservation purposes. |
| OSC-2.3 | **Project siting.** Site and develop land uses in a manner that is sensitive to the unique characteristics of local biological resources and that minimizes impacts on sensitive, endangered, or threatened species. |
| OSC-2.4* | **Biological Resources.** Require new developments to prevent, minimize or mitigate harm to biological resources, with a special emphasis on sensitive, threatened, or endangered species. |

* Denotes mitigating policies.

In addition, all future discretionary projects facilitated by the General Plan Update would be subject to project-level environmental review pursuant to CEQA. Where ground disturbance or habitat modification is proposed, CEQA review would require evaluation of potential effects on special-status species, identification of applicable regulatory requirements, and implementation of avoidance, minimization, or mitigation measures, as necessary, in coordination with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service, as appropriate.

As part of project-level review, biological resource assessments may be required for projects that could affect biological resources. Such assessments typically include review of available literature and biological databases (e.g., CDFW's CNDDB, USFWS's IPaC, and the CNPS's Inventory of Rare and Endangered Plants of California), mapping of vegetation communities, identification of jurisdictional wetlands and riparian habitats, and evaluation of wildlife movement corridors. Where necessary, qualified biologists would recommend project-specific measures to ensure that impacts are avoided or confined to approved areas of disturbance.




Source: PlaceWorks and City of San Bernardino 2026

Figure 3.4-8
**Consolidated Biological Resources Map**

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Because potential impacts to special-status species would be evaluated at the project level, and because the General Plan Update includes policies that require biological resource assessment and protection for development affecting vacant or undeveloped land or previously undisturbed areas, implementation of the General Plan Update would not result in significant impacts to special-status species. While future, project-specific development may require mitigation measures to address potential impacts to biological resources, no specific projects are known at this time, and any such measures would be identified through subsequent project-level environmental review. As a result, this impact is **less than significant.**

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is a highly urbanized area characterized by existing development and disturbed conditions. Sensitive species are unlikely to occur within the DTSP Area due to the extent of urbanization and the limited availability of suitable habitat. Future development within the DTSP Area would be required to comply with applicable policies of the General Plan Update, including the biological resources policies identified in Table 3.4-1. These policies are intended to avoid and reduce potential impacts to biological resources, including sensitive species. Compliance with these policies would minimize the potential for biological resource impacts associated with future development. Therefore, this impact is **less than significant.**

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Figure 3.4-7, the General Plan Update Area contains potential aquatic resources, including features that may qualify as riparian habitat. Additionally, several natural communities are present throughout the area. While a formal delineation of aquatic resources has not been completed for most of the General Plan Update Area, available data indicate the presence of features that could fall under the jurisdiction of the USACE and the CDFW.

The General Plan Update includes policies within the Open Space and Conservation Element listed in Table 3.4-4, *Riparian Habitat: Proposed General Plan Update Policies*, that minimize impacts to these resources.

### Table 3.4-4 Riparian Habitat: Proposed General Plan Update Policies

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-3.1* | **Development along riparian corridors.** Prohibit development and grading within 50 feet of natural riparian corridors, as identified by a qualified biologist, unless no feasible alternative exists. |
| OSC-3.2* | **Permitted uses.** Within riparian corridors, permit only land uses and development activities that are compatible with the protection of sensitive habitats through:<br>▪ Education/research, excluding structures or buildings<br>▪ Passive recreation, trails and scenic overlooks<br>▪ Fish and wildlife management activities<br>▪ Water supply or water recharge projects<br>▪ Flood control projects, bridges, and pipelines where no other feasible alternatives are available . |
| OSC-3.3* | **Development standards.** For development that could impact riparian corridors or other sensitive habitat, according to CDFW, ensure that any such project:<br>▪ Minimizes the removal of vegetation<br>▪ Minimizes erosion, sedimentation, and runoff by protection of vegetation and landscape<br>▪ Provides for sufficient passage of fish<br>▪ Minimizes wastewater discharge and entrapment<br>▪ Prevents groundwater depletion or substantial interference with surface and subsurface flows |
| OSC-4.1 | **Support wildlife corridors.** Support the establishment, protection, and continuity of wildlife corridors, including the removal of barriers that inhibit the growth or migration of wildlife in riparian corridors, waterways, ridgelines, canyons, and other features and protection of such areas from incompatible land uses. |

* Denotes mitigating policies

As an outcome of the CEQA process, future discretionary projects implemented under the General Plan Update would be required to undergo project-level environmental review to determine the presence of riparian habitats or sensitive natural communities and the extent of potential impacts.

Where such resources are identified, avoidance, minimization, and if necessary, mitigation measures would be developed based on site-specific conditions, regulatory agency requirements, and consultation with CDFW and other applicable agencies. These measures may include biological resource mapping, establishment and maintenance of avoidance buffers, construction monitoring, and measures to prevent erosion, sedimentation, and the spread of invasive species.

If riparian habitats are identified during future project-level environmental review, avoidance and minimization measures would be evaluated and applied where feasible in accordance with City requirements or the requirements of regulatory permits. Such measures may include the establishment oof avoidance buffers around riparian habitats, with buffer widths determined based on site-specific conditions and regulatory agency guidance. Where required, buffers would be clearly delineated prior to construction and maintained for the duration of construction activities. In addition, a qualified biologist or qualified biological monitor may be required during construction to ensure compliance with approved avoidance areas and permit conditions and to prevent inadvertent disturbance of riparian habitats. Therefore, impacts would be less than significant.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.4-6 and Figure 3.4-7, part of the southeast DTSP area is designated as creeks and channels. Further research of the Water Providers and Water Availability Map provided by the San Bernardino County shows that area is the Twin Creek Channel (San Bernardino 2022). Although there is a potential for riparian habitats and sensitive natural communities to exist within this channel, future development under the DTSP would be confined into said projects. The DTSP has no plans to affect this channel. Therefore, the DTSP would not significantly impact riparian habitats and sensitive natural communities through its construction and operation. Therefore, this impact is considered **less than significant.**

**Significance without Mitigation:** Less than significant.

**c) Would the project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Figure 3.4-7, the General Plan Update Area contains potential aquatic resources, including features that may qualify as wetlands. While a formal delineation of aquatic resources has not been completed for most of the General Plan Update Area, available data indicate the presence of features that could fall under the jurisdiction of the USACE and CDFW. Table 3.4-4 outlines policies intended to minimize impacts on these resources. However, because of the uncertainty regarding the extent and jurisdictional status of aquatic features, and the potential for future development to impact them, this impact is considered **potentially significant**.

**Significance without Mitigation:** Potentially significant.

**Impact BIO-1a: Implementation of the proposed General Plan Update could result in impacts to aquatic resources, including water of the U.S. and State.**

**Mitigation Measure BIO-1:** If riparian/riverine resources and vernal pools are proposed for avoidance, the habitat assessment shall include a commitment to place a conservation easement or deed restriction over the area in order to demonstrate that the area will be protected in perpetuity. If a project cannot avoid riparian/riverine habitat and/or vernal pools in perpetuity (both permanent and temporarily), a Determination of Biological Equivalent or Superior Preservation (DBESP) shall be required that would propose mitigation that demonstrates equivalent or superior function and value and shall be submitted to the City of San Bernardino Community and Economic Development Department. and applicable Wildlife Agencies.

**Mitigation Measure BIO-2:** If an action will impact riparian habitat as determined by a qualified biologist, a Lake and Streambed Alteration Agreement, pursuant to Section 1602 of the California Department of Fish and Game Code shall be obtained prior to the start of ground disturbing activities. Minimization measures will be developed during consultation with California Department of Fish and Wildlife (CDFW) as part of the Lake and Streambed Alteration Agreement process to ensure protections for affected fish and wildlife resources.

**Mitigation Measure BIO-3:** If an action has the potential to affect aquatic resources, an environmental analysis (i.e., a preliminary aquatic resources delineation) shall be conducted to determine if potentially regulated aquatic resources occur within the action area. A qualified wetland delineator shall conduct the environmental analysis. The analysis shall include a review of the best available hydrological information, a reconnaissance-level site visit, and an evaluation of aquatic resources to determine the potential for regulated aquatic resources to occur within the action area. If it is determined that there are no potentially regulated aquatic resources, no other measures are recommended and the habitat assessment shall be submitted to the City of San Bernardino Community Development Department and applicable Wildlife Agencies. If conditions or circumstances change after the environmental analysis is conducted and prior to ground-disturbing activities, the validity of the results shall be confirmed, or an updated environmental analysis shall be conducted prior to affecting the action area.

**Mitigation Measure BIO-4:** If an action may impact potentially regulated aquatic resources, an aquatic resources delineation shall be conducted by a qualified biologist for a project consistent with the methods detailed within the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987), Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008), and State Wetlands Definitions and Procedures for Discharges of Dredged and Fill

Material to Waters of the State, and local policies by the California Department of Fish and Wildlife (CDFW) regarding their jurisdiction, following the definitions contained within the California Fish and Game Code pertaining to regulated resources (lakes, streams, and associated hydrophytic vegetation). If it is determined by a qualified biologist that potentially regulated aquatic resources are absent from a project site or will not be impacted by the action, no other measures are recommended, and the habitat assessment shall be submitted to the San Bernardino Community Development Department and US Army Corps of Engineers (USACE). If it is determined that potentially regulated aquatic resources may be impacted by the action, the delineation shall be submitted to the USACE, and a Preliminary Jurisdictional Determination or Approved Jurisdictional Determination shall be obtained. The project applicant shall obtain all required permits from the USACE and applicable agencies prior to the start of construction activities.

**Significance with Mitigation:** Significant and unavoidable. Although Mitigation Measures BIO-1 through BIO-4 require project-level delineation, regulatory coordination, and compliance with federal and state permitting requirements, compensatory mitigation and regulatory compliance may reduce or partially offset impacts, but they do not ensure no net loss of wetland acreage, function, or ecological value. Because future development enabled by the General Plan Update could result in permanent wetland conversion, hydrologic alteration, or cumulative losses that cannot be fully avoided, and because the precise extent and location of aquatic resources are unknown at this programmatic level, impacts to state and federally protected wetlands could remain substantial. Accordingly, this impact is considered **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.4-7, an area in the southeast part of the DTSP Area is designated as creeks and channels. Further research of the Water Providers and Water Availability Map provided by the San Bernardino County shows that area is the Twin Creek Channel (San Bernardino 2022). Although there is a potential for aquatic resources to exist within this channel, future development under the DTSP would be confined into said projects. The DTSP has no plans to affect this channel. Therefore, the DTSP would not significantly impact aquatic resources through its construction and operation. Therefore, this impact is considered **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Figure 3.4-6, habitat linkages and wildlife corridors are present in the General Plan Update Area, particularly in the northern portion of the **c**ity, with some extending into the western and southern areas. While the General Plan Update proposes various land use changes that could impact these critical movement routes, Table 3.4-5, *Wildlife Corridors and Linkages: Proposed General Plan Update Policies*, outlines policies intended to minimize such impacts. However, given the scope and nature of potential development, impacts to wildlife corridors and habitat connectivity are considered **potentially significant**.

**Table 3.4-5 Wildlife Corridors and Linkages: Proposed General Plan Update Policies**

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-3.1* | **Development along riparian corridors.** Prohibit development and grading within 50 feet of natural riparian corridors, as identified by a qualified biologist, unless no feasible alternative exists. |
| OSC-3.2* | **Permitted uses.** Within riparian corridors, permit only land uses and development activities that are compatible with the protection of sensitive habitats through:<br>▪ Education/research, excluding structures or buildings<br>▪ Passive recreation, trails and scenic overlooks<br>▪ Fish and wildlife management activities<br>▪ Water supply or water recharge projects<br>▪ Flood control projects, bridges, and pipelines where no other feasible alternatives are available . |
| OSC-3.3* | **Development standards.** For development that could impact riparian corridors or other sensitive habitat, according to CDFW, ensure that any such project:<br>▪ Minimizes the removal of vegetation<br>▪ Minimizes erosion, sedimentation, and runoff by protection of vegetation and landscape<br>▪ Provides for sufficient passage of fish<br>▪ Minimizes wastewater discharge and entrapment<br>▪ Prevents groundwater depletion or substantial interference with surface and subsurface flows |
| OSC-4.1 | **Support wildlife corridors.** Support the establishment, protection, and continuity of wildlife corridors, including the removal of barriers that inhibit the growth or migration of wildlife in riparian corridors, waterways, ridgelines, canyons, and other features and protection of such areas from incompatible land uses. |

**Table 3.4-5 Wildlife Corridors and Linkages: Proposed General Plan Update Policies**

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-4.2 | **Open space corridors.** Identify areas for land acquisition, funding, and strategy to establish an open space corridor contiguous to the National Forest via Cable Creek and/or Devil Canyon, consistent with the San Bernardino National Forest Land Management Plan. |
| OSC-4.3 | **Acquisitions.** Support nongovernmental organizations and private entities who purchase, own, maintain, and expand areas for conservation and preservation. Prioritize habitat and species from the San Bernardino County Regional Conservation Investment Strategy. |
| OSC-4.4 | **Habitat fragmentation.** Explore opportunities to provide linkages for wildlife to move throughout their territories and reduce habitat fragmentation. Proposed development shall not contribute to habitat fragmentation without appropriate mitigation. |

* Denotes mitigating policies.

**Significance without Mitigation:** Potentially significant.

**Impact BIO-2a: Implementation of the General Plan Update could impact wildlife movement.**

**Mitigation Measure BIO-5:** The City shall coordinate with applicable wildlife resource agencies (e.g., CDFW, USFWS) to develop a wildlife movement and habitat linkages plan or map for the General Plan Update Area. The plan/map shall:

- Be based on the best available biological information, including regional studies and databases;
- Identify existing and potential wildlife movement corridors, regional and local habitat linkages, and areas important for wildlife breeding, foraging, or dispersal; and
- Prioritize areas for protection, avoidance, or strategic enhancement.

**Mitigation Measure BIO-6:** For any discretionary action that may adversely affect wildlife movement, established or potential wildlife corridors, or wildlife nursery sites, the project applicant shall prepare a biological resources assessment (BRA) conducted by a qualified biologist. The BRA shall:

- Review the best available biological information, including CDFW's CNDDB, BIOS, and the programmatic wildlife linkages plan;
- Include a reconnaissance-level site visit; and

- Evaluate biological conditions within and adjacent to the action area to determine whether the project would substantially affect wildlife movement, corridor functionality, or the use of nursery sites
- If the BRA determines that the action would not substantially affect wildlife movement, corridors, or nursery sites, no further mitigation is required.
- If the BRA determines that the action would substantially affect wildlife movement, corridors, or nursery sites, the City shall require implementation of avoidance, minimization, and/or mitigation measures developed in consultation with applicable resource agencies (e.g., CDFW, USFWS, NMFS). Measures may include, but are not limited to:
  - Project redesign or siting to avoid corridors or nursery sites;
  - Clustering of development;
  - Conservation easements;
  - Habitat restoration or enhancement;
  - Wildlife crossings or wildlife-permeable fencing.

All required measures shall be incorporated as enforceable conditions of project approval to maintain or restore functional wildlife connectivity in accordance with the programmatic linkages plan.

**Significance with Mitigation:** Less than significant. Mitigation Measures BIO-5 and BIO-6 would reduce potential impacts to wildlife movement, corridors, and nursery sites to a less than significant level by requiring site-specific biological evaluations conducted by qualified biologists prior to project implementation. If sensitive wildlife corridors or nursery sites are present, avoidance and minimization strategies such as design modifications, buffer zones, wildlife crossings, and barrier removal must be implemented in consultation with resource agencies like CDFW or USFWS. These measures collectively ensure the protection and maintenance of functional wildlife movement routes and critical habitat connectivity, effectively reducing fragmentation and preventing long-term ecological impacts. Impacts would therefore be reduced to **less than significant**.

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.4-6, there are habitat linkages and wildlife corridors within the DTSP Area, specifically creeks and channels in the southwest portion of the DTSP Area. The creeks and channels can provide the movement of wildlife; therefore, the DTSP could potentially impact

these habitat linkages and wildlife corridors from future development. Therefore, this impact is **potentially significant.**

**Significance without Mitigation:** Potentially significant.

**Impact BIO-2b: Implementation of the Downtown Specific Plan could impact wildlife movement.**

**Mitigation Measures:** Implement Mitigation Measures BIO-5 and BIO-6.

**Significance with Mitigation:** Less than significant. Mitigation Measures BIO-5 and BIO-6 would reduce potential impacts to wildlife movement, corridors, and nursery sites to a less than significant level by requiring site-specific biological evaluations conducted by qualified biologists prior to project implementation. If sensitive wildlife corridors or nursery sites are present, avoidance and minimization strategies—such as design modifications, buffer zones, wildlife crossings, and barrier removal—must be implemented in consultation with resource agencies like CDFW or USFWS. These measures collectively ensure the protection and maintenance of functional wildlife movement routes and critical habitat connectivity, effectively reducing fragmentation and preventing long-term ecological impacts. Impacts would be reduced to **less than significant**.

### e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Figure 3.4-5, the General Plan Update Area is not within any HCP's including the Colton West Valley HCP, Upper Santa Ana River Wash HCP, and Upper Santa Ana River HCP.

The area is within the service regions of several established mitigation and conservation banks (e.g., Cajon Creek, Colton Dunes, Lytle Creek, Puzzle Creek, and others), that provide mechanisms for offsetting any unavoidable impacts through habitat credit purchases, in line with the regulatory framework of HCPs and other federal and state conservation programs. These banks ensure that impacts are adequately mitigated and contribute to the regional conservation objectives. Future development from the General Plan Update would need to review HCPs and implement mitigation banks and/or programs.

In addition, future project implementation would be required to comply with the City's policies regarding the preservation of trees. For example, Chapter 15.34, Removal or Destruction of Trees, of the SBMC prohibits cutting down, uprooting, destroying, and/or removing more than five trees within any 36-month period from a development site or parcel of property without first being issued a permit from the Development Services Department of the City of San

Bernardino. The General Plan Update incorporates policies in the Open Space and Conservation Element that specifically address habitat protection, sensitive species conservation, wildlife corridors, and natural resource management. These policies are consistent with and, in many cases, reinforce the management and mitigation strategies established by the HCPs. For example, policies to limit development within riparian areas, minimize habitat fragmentation, and support regional conservation efforts (e.g., OCS-4.3, Acquisitions and Policy, and OSC-4.4, Habitat fragmentation) directly support the implementation of HCP conservation goals.

Therefore, implementation of the General Plan Update would not conflict with any adopted Habitat Conservation Plan, local conservation strategy, or ordinance protecting biological resources. With supportive policies and access to regional mitigation options, this impact is considered **less than significant.**

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.4-5, the DTSP area is not within any HCPs. The DTSP Area is in the service areas of several mitigation and conservation banks, including the Cajon Creek Conservation Bank, Riverpark Mitigation Bank, and Soquel Canyon Mitigation Bank (see Figure 3.4-5). However, the DTSP Area is already highly urbanized and substantially disturbed, with limited to no presence of sensitive biological resources. As a result, implementation of the Specific Plan is not expected to affect or conflict with the purpose or operation of these mitigation or conservation programs.

Additionally, all future development within the DTSP Area would be subject to the City's applicable tree preservation policies. For example, SBMC Chapter 15.34.020 prohibits the removal of more than five trees within any 36-month period without obtaining a permit from the City's Development Services Department. This ensures that tree resources are reviewed and protected as part of project-level planning and permitting.

Therefore, future development under the DTSP would not conflict with local biological resource policies, ordinances, or conservation plans. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update Area is within or adjacent to several regional conservation efforts, including the Upper Santa Ana River Habitat Conservation Plan (Upper SAR HCP), the Upper Santa Ana River Wash Habitat Conservation Plan (Wash Plan), the San Bernardino County Regional Conservation Investment Strategy (RCIS), and the Colton West Valley HCP. These efforts establish conservation strategies for sensitive species and habitats across the region, guiding land use and development while promoting long-term ecological sustainability.

The General Plan Update includes policies and mitigation measures specifically designed to support habitat connectivity, species protection, and resource conservation. These include avoidance and minimization strategies for impacts to riparian habitat, wildlife corridors, and sensitive vegetation communities, as well as coordination with state and federal agencies during project-level review. Implementation of the General Plan Update would be consistent with the goals and requirements of applicable conservation plans and would not conflict with their provisions. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

The DTSP Area is highly urbanized and does not contain any designated critical habitat, sensitive biological resources, or areas covered by an adopted HCP or NCCP. Although the DTSP Area is within the service areas of several mitigation and conservation banks (e.g., Cajon Creek, Riverpark, and Soquel Canyon), the nature of existing development and limited habitat value within the DTSP boundaries means that future projects are unlikely to affect regional conservation objectives. Therefore, the DTSP would not conflict with any adopted HCP, NCCP, or other approved conservation plan, and impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.4.5 Cumulative Impact Analysis

The geographic context for cumulative impacts on biological resources includes the General Plan Update Area, the DTSP Area, and surrounding lands within the City of San Bernardino's SOI. This area encompasses both urbanized and undeveloped or partially disturbed lands that may support native habitats, wildlife corridors, and special-status species. Cumulative development includes anticipated growth from implementation of the General Plan Update, the DTSP, and

other reasonably foreseeable regional projects, including residential, commercial, infrastructure, and transportation improvements. These cumulative projects could result in incremental loss or degradation of biological resources, especially in areas that have not been previously disturbed.

### Would the project have a cumulative effect related to biological resources?

Cumulative impacts to biological resources occur when multiple projects incrementally lead to habitat loss, fragmentation, or degradation of sensitive species habitat, riparian areas, wetlands, or wildlife corridors. While the DTSP Area is already highly urbanized and has limited potential to support sensitive resources, the broader General Plan Update Area includes open space, habitat linkages, and natural features that may contain important biological resources.

The General Plan Update includes policies in the Open Space and Conservation Element aimed at protecting wildlife corridors, riparian zones, and sensitive habitats. In addition, implementation of mitigation measures such as biological resource assessments, regulatory permitting, and avoidance or compensatory strategies would reduce the severity of project-specific impacts. Furthermore, regional habitat conservation plans and the availability of mitigation and conservation banks offer additional mechanisms for offsetting unavoidable biological impacts.

However, despite the policy framework and available mitigation options, not all impacts to biological resources may be fully avoided or reduced to less than significant. Habitat fragmentation, cumulative loss of native vegetation, and stress on local species may still occur as development proceeds citywide. In some cases, limitations in available mitigation land, timing of mitigation implementation, or changes in species status may prevent full mitigation of impacts.

Any development within the city has the potential to result in impacts to biological resources. Though compliance with the Proposed General Plan policies and mitigation measures would reduce potential impacts, it is uncertain whether all cumulative impacts can be mitigated to a less-than-significant level. Therefore, the proposed project's contribution to cumulative biological resource impacts is **conservatively considered cumulatively considerable and potentially significant**.

**Impact BIO-3: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative impacts to biological resources.**

**Mitigation Measures:** Implement Mitigation Measures BIO-1 through BIO-6.

**Significance with Mitigation:** Significant and unavoidable. Although the General Plan Update contains numerous policies and goals designed to minimize impacts on biological resources, and

although individual projects will be subject to environmental review and required to comply with local, state, and federal regulations, the cumulative nature of future growth will likely result in residual impacts that cannot be reduced to less than significant. Therefore, the proposed project's contribution to cumulative biological impacts is considered **significant and unavoidable** and impacts would be **cumulatively considerable.**

## 3.4.6 References

San Bernardino County. 2022. *Water Providers and Water Availability*. https://www.arcgis.com/home/item.html?id=9d958c8d43b948f48c3e091d3c804603

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# 3.5 CULTURAL RESOURCES

This section describes the cultural-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project." Summaries of the relevant regulatory framework and existing conditions are followed by a discussion of the project-specific and cumulative impacts. Cultural resources comprise archaeological and historical resources. Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Historical resources include sites, structures, objects, or places that are usually at least 50 years old and are significant for their engineering, architecture, cultural use or association, etc. In California, historic resources cover human activities over the past 12,000 years. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements.

The analysis in this section is based in part on information from an existing conditions cultural resources report that was prepared by ECORP Consulting (ECORP). Additionally, an archaeological and built environment model, and accompanying technical report, were provided by ECORP; however, these documents are designated as confidential. Accordingly, these materials are not included in an appendix, in this DEIR, except for the Built Environment figure referenced herein (see Figure 3.5-1, *Built Environment Sensitivity*). While the archaeological materials are identified and listed for informational purposes, they are not attached due to confidentiality restrictions.

## 3.5.1 Regulatory Framework

### FEDERAL

### National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

### Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and tribal lands.

### Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Native American tribes.

## STATE

### California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

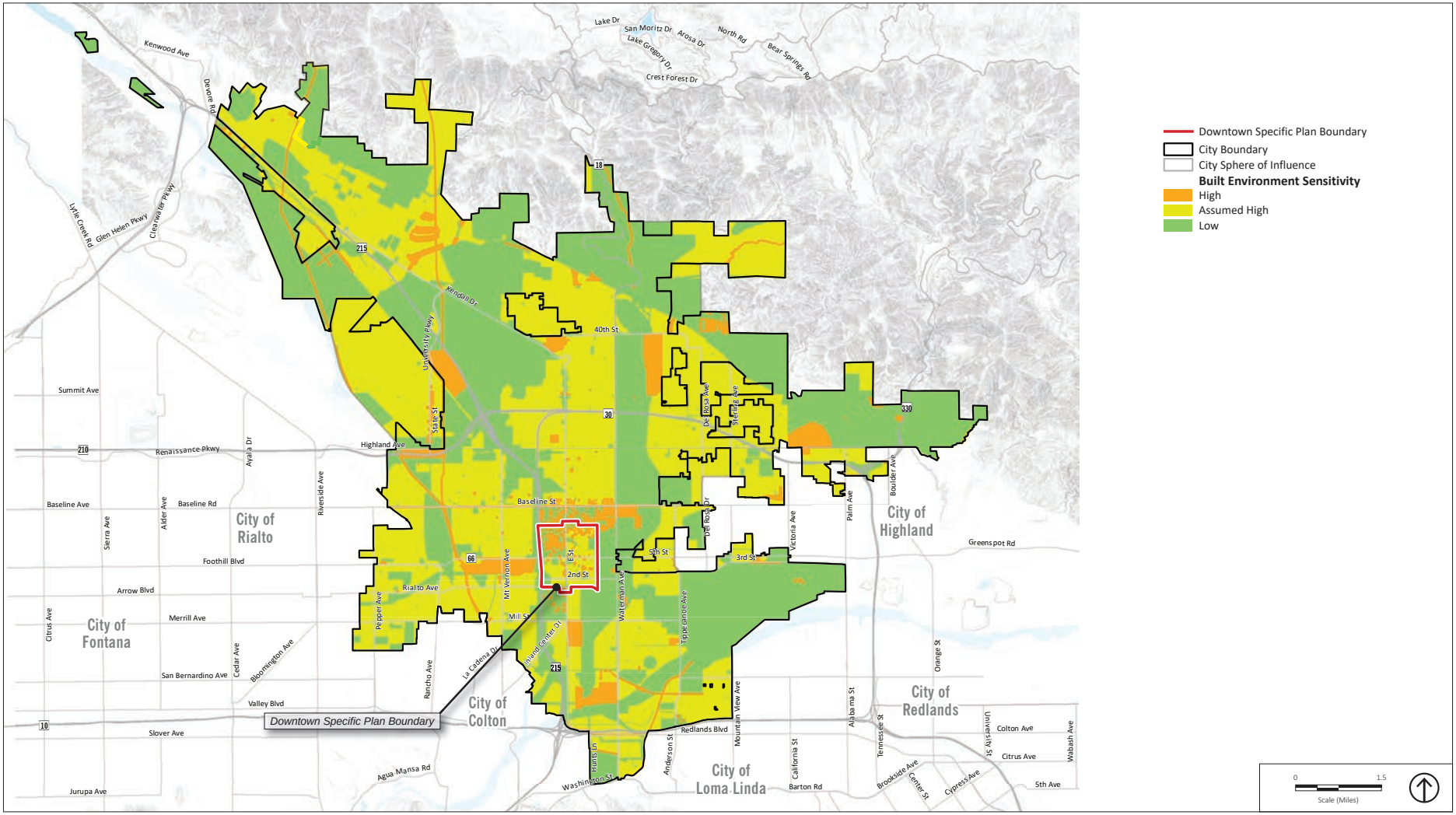
PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation (OHP), which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

### California Register of Historical Resources

The State Historical Resources Commission has designed this program for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register of Historic Resources (CRHR) is an authoritative guide to the state's significant historical and archaeological resources.




Source: City of San Bernardino 2020.

Figure 3.5-1
**Built Environment Sensitivity**

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The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA.

To be eligible for listing in the CRHR, a resource must meet at least one of the following criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- It is associated with the lives of people important to local, California, or national history.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may change its historical, cultural, or architectural significance. Resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

## California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance. The resource must be approved for designation by the county board of supervisors or the city/town council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks. A resource must meet at least one of these following criteria:

- Be the first, last, only, or most significance of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.

- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

## California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a point. If a point is subsequently granted status as a landmark, the point designation is retired.

To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- Be the first, last, only, or most significant of its type within the local geographic region (city or county).
- Be associated with an individual or group having a profound influence on the history of the local area.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or be one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

## California Historic Building Code

The California Historic Building Code—California Code of Regulations, Title 24, Part 8—provides regulations for the preservation, restoration, rehabilitation, relocation, or reconstruction of buildings or properties designated as qualified historical buildings or properties. The California Historic Building Code is intended to provide solutions for the preservation of a qualified historical buildings or properties, to promote sustainability, to provide access for persons with disabilities, to provide a cost-effective approach to preservation, and to provide for the reasonable safety of the occupants or users.

## Mills Act

Under the Mills Act, California Government Code Sections 50280 et seq., a city or county may contract with the owner of any qualified historical property to preserve the property's historic features. The owner continues to preserve the property, and the State reduces property taxes. The agreements provide a benefit to cities in that they ensure preservation and guarantee authentic rehabilitations and a high level of maintenance of cultural resources important to communities.

### California Health and Safety Code

California Health and Safety Code Section 7050.5 requires that if human remains are discovered on the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

## LOCAL

### City of San Bernardino General Plan

The Cultural Resources Element provides the basis for continued efforts by the City and partner organizations to preserve, enhance, and maintain sites and structures that are deemed architecturally, historically, archaeologically, and/or culturally significant. These goals, polices and implementation measures provide guidance and policy direction regarding cultural, historic and archaeological resources in the City as well as help reduce impacts to such resources.

### City of San Bernardino Municipal Code

Chapter 15.37, Historic Building Demolition, of the San Bernardino Municipal Code (SBMC) states that no building or structure fifty years old or older shall be demolished unless a valid Demolition Permit has been issued. In addition, Section 15.37.050, Historic Resource Evaluation Report, states that as part of the demolition permit, a historic resource evaluation report is required and must contain ten elements, some of which are methods of evaluation, architectural description of the resource, historical background, and recommendations that may include proposed mitigation. Chapter 15.37.055, Criteria for Determination of Historical Significance, lists the criteria that must be determined to consider a building or structure historically significant.

### City of San Bernardino Development Code

The existing Development Code is found in Title 19 of the SBMC. This section provides a comprehensive set of regulations governing land use and development within the city, establishing the framework for how properties can be used, developed, and modified to ensure alignment with the city's planning goals and community standards. Key components of the Development Code related to cultural resources include:

- **Main Street Overlay Zone:** provides a comprehensive set of development standards to be applied within the city's downtown area.

The proposed project includes an update to the Development Code.

## 3.5.2 Existing Conditions

### CITYWIDE

#### Pre-contact Background

Evidence from archaeological sites indicate that people first arrived in the San Bernardino Valley around 12,000 B.P. San Bernardino is located within a larger region occupied by the Serrano group of Native Americans at the time of contact with Europeans, around AD 1769. The Serrano occupied an area in and around the San Bernardino Mountains and into the Mojave Desert. Their territory extended west along the north slope of the San Gabriel Mountains, east to Twentynine Palms, north to the Victorville and the Lucerne Valley areas, and south to the Yucaipa Valley and San Jacinto Valley. Settlement locations were determined by the availability of water; most Serranos lived in villages near water sources. Houses and ramadas were round and constructed of poles covered with bark and tule mats (Kroeber 1925). Most Serrano villages also had a ceremonial house that served as a religious center. Other structures included granaries and sweathouses (Bean and Smith 1978). Partly due to their mountainous and desert territory, contact between Serrano and European Americans was minimal prior to the early 1800s. In 1819, an asistencia (mission outpost) was established near present-day Redlands. It relocated many Serrano to Mission San Gabriel. However, small groups of Serrano remained in the area northeast of the San Gorgonio Pass and preserved aspects of their native culture. Today, most Serrano live on the Morongo and San Manuel reservations (Bean and Smith 1978).

#### Historic Period Background

##### *Regional History*

The first European to visit Alta California was Spanish explorer Juan Rodriguez Cabrillo in 1542. The colonization of Alta California began with a land expedition led by Spanish army captain Gaspar de Portolá in 1769, which led to the establishment of Spanish missions, presidios, and pueblos. The Franciscan missionary friars built 21 missions in Alta California, starting with Mission San Diego in 1769 and ending with missions in San Rafael and Sonoma, both founded in 1823. The missions sustained themselves through cattle ranching and cultivating California's earliest orchards, vineyards, and vegetable gardens, all using unpaid Native American labor. The Spanish period ended in 1821 with Mexican independence, and former mission lands were granted to retired soldiers and other Mexican citizens for use as cattle ranches. Much of the land along the coast and interior valleys became part of Mexican land grants or ranchos (Robinson 1948). Rancho owners sometimes lived in nearby pueblos, such as San Diego, San Juan Capistrano, or Los Angeles, but most resided on their own land in expansive haciendas. The Mexican Period began with independence from Spain in 1821 and continued until the Mexican-

American War of 1846 to 1848. The American period began when the Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848, leading to Alta California becoming a territorial possession of the United States. Rapid growth during the Gold Rush of 1849 led to statehood in 1850. Most Mexican land grants were confirmed by U.S. courts and surveyed by the U.S. Surveyor General's office. office. The City of San Bernardino is on a portion of the land known during the Mexican Period as Rancho San Bernardino, a grant given to Jose del Carmen Lugo, his two brothers, and Diego Sepulveda (related to the Lugos by marriage) in 1842. The Lugo family's Rancho San Bernardino encompassed land in both the San Bernardino and Yucaipa valleys, extending from present-day Colton to Calimesa (Aviña 1976:91).

### *Mormon Foundations (1850–1858)*

In 1851, a group  arrived in Southern California to facilitate overseas missionary work. They settled at Rancho San Bernardino and successfully negotiated with the Lugo family for the purchase of the rancho. The Mormons planted wheat and grazed livestock, which fetched high prices in Los Angeles and helped feed Gold Rush camps in Northern California. The colony attracted other Mormon settlers, including many Gold Rush participants who gave up on mining to farm in the San Bernardino Valley. Of the initial settlers who came from Utah, 26 were African Americans who became ex-slaves upon arriving in California; many played key roles in San Bernardino's development after a state judge confirmed their freedom in 1857 (Brown, Jr. and Boyd 1922; Cataldo 2016).San Bernardino's Mormon settlers initially planned to build a town in the foothills near Cajon Pass but eventually opted for the superior grazing lands of the San Bernardino Valley flatlands. In April 1853, the California legislature petitioned to create San Bernardino County from a portion of northeastern Los Angeles County. On April 13, 1854, the California legislature incorporated the City of San Bernardino. By then, the town had approximately 1,200 residents, three-quarters of whom were Mormon. Colonists established a grist mill, built adobe schoolhouses, and excavated a network of pioneer irrigation canals (Brown, Jr. and Boyd 1922). San Bernardino's newcomers continued agricultural work, with wheat remaining the staple crop.

### *Gateway City and "Boom Years" (1858–1900)*

In 1862, the creation of a wagon road through Cajon Pass and a ferry service across the Colorado River at Fort Mojave opened new markets for goods in the southwestern desert settlements of California, Nevada, Utah, and Arizona. San Bernardino, located at the foot of Cajon Pass, facilitated much of this desert trade. In addition, by 1866, San Bernardino had 20 stores, 2 hotels, a saddler, and a livery stable. In 1867, a brick commercial building was built, signaling the town's architectural transition from adobe to brick. It was joined by other brick buildings on D Street between 3rd and 4th streets, forming the basis of a modern downtown (Brown, Jr. and Boyd 1922). The Southern Pacific Railroad arrived in San Bernardino County in 1875. The Atchison, Topeka, and Santa Fe Railroad entered Southern California through the Cajon Pass. The Santa Fe Railroad played a significant role in the development of San Bernardino

and greater Southern California by breaking the Southern Pacific's regional rail monopoly and initiating a rate war between rival carriers. During the "boom years" of the 1880s, San Bernardino's population increased from 1,673 in 1880 to 4,012 in 1890. The Santa Fe Railroad established its main Southern California maintenance facility in San Bernardino in 1886, becoming the largest employer and employing approximately half of the city's workforce by 1920 (Brown, Jr. and Boyd 1922).

### *Automobiles and Growth (1900–1940)*

San Bernardino experienced rapid growth during the first three decades of the twentieth century. In 1900, the city's population stood at 6,150. Most of its urban footprint remained confined to the 72 blocks of the original townsite, with small farms scattered across the north and west edges of town. Between 1900 and 1910, however, the population suddenly doubled to 12,779. Between 1920 and 1930 it doubled again, from 18,721 to 37,481, as residential growth crept north to the foot of Shandin Hills, three miles north of the original townsite. This growth was facilitated by the proliferation of automobiles and the paving of arterial surface roads leading north, such as Mt Vernon Avenue, G Street, E Street, Arrowhead Avenue, Sierra Way, and Waterman Avenue. These roads led to the development of two- and three-bedroom houses to meet the needs of San Bernardino's middle-class workforce. Downtown San Bernardino remained the commercial, cultural, and political heart of the city, with office towers, government buildings, theaters, department stores, and the Santa Fe rail station clustered in the southern half of the original townsite. Affluent residents opted for well-appointed northside bungalows and period revival-style houses built south of Highland Avenue and west of Arrowhead Avenue in the vicinity of San Bernardino High School. E Street between downtown San Bernardino and San Bernardino High School became the most heavily trafficked thoroughfare in town, with a cluster of commercial properties developed around its intersections with Baseline Road and Highland Avenue.

On the west side of San Bernardino, a working-class Hispanic colonia developed near 5th Street and Mt. Vernon Avenue. Many Hispanic newcomers arrived after 1910 to escape violence associated with the Mexican Revolution or meet labor needs associated with the citrus industry and the railroad. The Mt. Vernon colonia received an enormous economic boost when state highway officials designated 5th Street and Mt. Vernon Avenue as Route 66 through San Bernardino (Ocegueda 2017).

The Mt. Vernon colonia shared space with Italian immigrants, who, like their Mexican counterparts, fled political turmoil in their home country and found work in San Bernardino's citrus groves and vineyards. Italian businesses located on the Route 66 corridor included Eligio Zanone's market, which catered to Italians, Mexicans, and the traveling public. Likewise, a roadside Italian restaurant called "Mother Massetti's Inn" at 5th and Mt. Vernon gained fame when Hollywood celebrities such as Bob Hope, Frank Sinatra, and Gary Cooper began routinely stopping in for meals on the road to Las Vegas and Palm Springs (Ocegueda 2011).

East of the Mt Vernon colonia, the Westside neighborhood between 6th Street, 9th Street, and the Santa Fe tracks along I Street became the heart of San Bernardino's African American community. Neighborhood institutions played key roles in the community's development, such as the St. Paul A.M.E. Church, which hosted regular NAACP meetings, and the Prince Hall Masonic Lodge, which provided commercial space for local Black-owned businesses. Private Westside residences also served as important community gathering places during the 1930s and 1940s, with the Anna B. Garner Women's Political Club meeting at members' houses and the *Tri-County Bulletin*, a Black Inland Empire newspaper, playing a critical role in amplifying the community's voice during the Civil Rights Era (St. Paul A. M. E. Church 2020; Tilton 2022).

### *Federal Influence (1940–2000)*

Route 66 played a significant role in San Bernardino's history as a gateway city between Southern California and the American Southwest. Thousands of Dust Bowl migrants and defense workers arrived in the area during the 1930s, followed by the establishment of a pilot training base in 1941. This base later became Norton Air Force Base, a major employer in the postwar decades. In the 1950s, the California Department of Transportation built Highway 395, designated I-215 in 1982, in the city, making Route 66 obsolete by installing left-exiting off-ramps and prioritizing the city's downtown and E Street commercial districts (Ocegueda 2017). This freeway also accelerated the city's growth to the north, with long-distance commuters opting for new neighborhoods near the California State University campus, which opened in 1965. Downtown urban renewal led to the demolition of early-twentieth-century landmarks, such as the Central City Mall, in favor of modern development (Southern California Association of Governments 2008). San Bernardino's population grew steadily through the mid- to late twentieth century, reaching 185,000 by the end of the century. However, many late-twentieth-century newcomers were Southern California "supercommuters," who drove long distances to jobs in Los Angeles and Orange counties. The closure of Santa Fe Railroad's San Bernardino shops in 1991 and the decommissioning of Norton Air Force Base in 1995 dealt major blows to San Bernardino's job base, raising questions about the future of its working-class communities. By 2000, the entire San Bernardino Valley became the bedroom region for greater Los Angeles (Jones and Palmer 2002).

### *Shipping and Distribution Facilities (2000–2020)*

San Bernardino experienced significant growth in the late 1990s and early 2000s due to the establishment of new shipping and distribution facilities. The Burlington Northern Santa Fe (BNSF) opened an intermodal shipping container depot at the site of the old San Bernardino shops in 1996, transferring hundreds of shipping containers daily (San Bernardino Sun 1998; 1996). In 2001, Yellow Freight opened a 192-door distribution center near the BNSF container depot (Heavy Duty Trucking 2001). The former Norton Air Force Base was repurposed as a retail distribution center, with the Inland Valley Development Agency constructing several tilt-up retail centers between 2002 and 2008. Early tenants included Kohls, Mattel, and Stater Brothers. In

2012, Amazon opened its first fulfillment center outside the old Air Force base grounds. The new San Bernardino International Airport opened a 20-million-dollar terminal offering passenger flights, with cargo handlers like UPS and FedEx becoming the airport's most significant carriers. By 2020, the former base had become a patchwork of shipping distribution centers, retaining its "gateway city" role as a shipping and distribution hub for Southern California (San Bernardino Sun 2019).

## Historic Resources

The City of San Bernardino contains over 1,000 previously recorded cultural resources. The majority of these are historic-period buildings and structures. The information presented below was gathered through publicly accessible repositories and databases. There are a total of 38 historical resources in the City of San Bernardino.

### *California Historic Landmarks*

The OHP lists six California Historical Landmarks in the city.

- The Arrowhead
- Garcés-Smith Monument
- Mormon Trail Monument
- Santa Fe And Salt Lake Trail Monument
- Stoddard-Waite Monument
- No. 44 Site of Mormon Stockade

### *Points of Historical Interest*

The OHP lists 25 Points of Historical Interest in the City of San Bernardino.

- 25th Street Historic District
- Andreson Building
- Atwood Adobe Site
- Bella Union Hotel Site
- Center of San Bernardino 1853
- Confederate Attack Marker Site
- Cox-Bradley Home
- Del Rosa Swamp
- Fred T. Perris House Site
- Heritage House
- Home of Eternity Cemetery of Congregation Emanuel

- Home of Neighborly Service
- Jedediah Smith Monument
- Martin Adobe Site
- Mormon Flour Mill Site
- Mormon Schools Site
- National Orange Show
- Old Pioneer Catholic Cemetery
- Pioneer Cemetery
- Pioneer Monument
- San Bernardino California Theatre
- Santa Fe Station Building
- St. Bernardine Of Siena Catholic Church
- Sturges Auditorium
- West Twin Creek Water Co. System Flume

### *National Register of Historic Places*

The National Register Information System revealed six listed properties in San Bernardino.

- Atchison, Topeka and Santa Fe Railway Passenger and Freight Depot
- Crowder Canyon Archeological District
- San Bernardino County Court House
- US Post Office-Downtown Station
- California Theatre
- Wigwam Village No. 7

### *California Register of Historical Resources*

The OHP lists one resource on the CRHR within San Bernardino—the Stephens & Bobbitt Mortuary / Victory Chapel (C26).

## Cultural Resources Sensitivity

A Built Environment Cultural Resources Sensitivity Model was developed for the City of San Bernardino, as shown on Figure 3.5-1, *Built Environment Sensitivity.* The Cultural Resources Sensitivity Model classifies areas into three categories: High Sensitivity, Assumed High Sensitivity, and Low Sensitivity:

- **High Sensitivity.** Areas with recorded historic buildings and structures, including both known sites and the surrounding regions with higher resource density. Projects in these areas should anticipate a higher chance of uncovering archaeological sites related to historic structures, such as privies, cellars, and foundations. For projects requiring discretionary approval in High Sensitivity areas, a field visit by a qualified architectural historian or cultural resources professional is recommended to assess the integrity of the sites.

- **Assumed High Sensitivity.** Areas not yet surveyed by professionals for historic buildings and structures, such as private parcels without prior City entitlements or approvals. Until surveyed, these areas are considered highly sensitive for built environment resources. If a future survey finds no historic structures, the property may be reclassified as either High or Low Sensitivity by City planning staff in consultation with qualified professionals.

- **Low Sensitivity.** Areas previously surveyed by professionals where no historic buildings or structures were found. These areas are generally not expected to have cultural resources impacts, although subsurface archaeological deposits might still be present. Standard conditions and mitigation measures should be applied for any unanticipated discoveries during projects.

## Archeological Resources

An Archaeological Sensitivity Model was developed for the city. The archaeological sensitivity model is confidential; however, at any time, a potential applicant for a project within the city can request information about whether the project is in a known High, Assumed High, or Low Sensitivity area. The archaeological sensitivity model classifies areas into three categories:

- **High Sensitivity.** These zones have known archaeological sites from past surveys or high-density resource areas. Projects here should anticipate encountering archaeological sites and require a field visit by a qualified archaeologist if seeking discretionary City approval.

- **Assumed High Sensitivity.** These areas have not been surveyed and include properties without prior City entitlements. They are presumed to be highly sensitive until surveyed. If a future survey finds no archaeological sites, the classification may be updated by City staff with professional input.

- **Low Sensitivity.** Areas previously surveyed with no archaeological sites found are classified as Low Sensitivity. While not expected to have cultural resource constraints, unanticipated sites might still be present. Standard measures for unexpected discoveries should be applied.

# DOWNTOWN AREA

## Historical Background

Downtown San Bernardino developed near the city's original settlement, anchored by 3rd and E Streets and bounded roughly by 6th Street, Arrowhead Avenue, 2nd Street, and G Street. Commercial blocks extended along 3rd Street for about a mile between the San Bernardino County courthouse at Mountain View Avenue and the ATSFRR depot at L Street. Along E Street, commercial blocks extended north from 2nd Street to the San Bernardino High School campus at 7th Street, which nearly reached Base Line Street a mile north of downtown by 1940.

Downtown San Bernardino included commercial and government buildings one to five stories tall. Historical photographs from around 1900 reveal Romanesque, Queen Anne, Italianate, and Two-Part Block and Early-Twentieth-Century Commercial Style buildings lining downtown streets. After 1910, they were joined by larger buildings with Renaissance Revival, Mission Revival, Beaux-Arts, and Art Deco/Moderne designs. Most of these buildings, however, succumbed to the wrecking ball in favor of modern concrete, glass, and steel buildings built during the 1950s, 1960s, and 1970s.

## Historical Resources

As shown in Table 3.5-1, *Historical Resources in the DTSP Area*, there are 17 historical resources within the DTSP Area. These include one California Historic Landmark, 13 historical points of interest, and three listed properties in the National Register of Historic Places.

**Table 3.5-1 Historical Resources in the DTSP Area**

| Name | Address | List |
|---|---|---|
| No. 44 Site of Mormon Stockade | 351 North Arrowhead Avenue | California Historic Landmarks |
| Anderson Building | 320 N E Street | Points of Historic Interest |
| Atwood Adobe Site | 4th Street and Arrowhead Ave | |
| Center of San Bernardino 1853 | | |
| Confederate Attack Marker Site | | |
| Cox-Bradley Home | | |
| Fred T. Perris House Site | D Street north of 6th Street | |
| Jedediah Smith Monument | 346 Arrowhead Ave | |
| Martin Adobe Site | | |

**Table 3.5-1 Historical Resources in the DTSP Area**

| Name | Address | List |
|---|---|---|
| Mormon Flour Mill Site | | |
| Mormon Schools Site | | |
| San Bernardino California Theatre | 562 West 4th Street | |
| St. Bernardine Of Siena Catholic Church | 531 North F Street | |
| Sturges Auditorium | 780 North E Street | |
| San Bernardino County Court House 05 | 247 West 3rd Street | National Registers of Historic Places |
| US Post Office--Downtown Station | 390 West 5th Street | |
| California Theatre | 562 West 4th Street | |

Source: ECORP 2022.

### *Cultural and Archaeological Resources*

The DTSP Area contains a mix of high, low, and assumed high sensitivity areas for cultural resources and archaeological resources.

## 3.5.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form**, includes questions concerning cultural resources. The issues in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the project would have a significant effect concerning cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

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

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

# METHODOLOGY

## Records Search and Archival Research

A cultural resources records search was conducted through the South Central Coastal Information Center (SCCIC), part of the California Historical Resources Information System (CHRIS), housed at California State University, Fullerton. The objective of the search was to:

- Determine the extent and coverage of previous cultural resources surveys within the City of San Bernardino.
- Identify the locations and distribution of previously recorded archaeological sites and built environment resources.
- Highlight areas of high cultural sensitivity based on clusters of recorded resources.

The SCCIC search included a review of official archaeological site and survey maps for San Bernardino County. In addition, historic-period maps, U.S. Geological Survey (USGS) topographic maps, and historical aerial photographs were consulted to assist in identifying built environment resources. Supplemental research was also conducted using collections and archival materials from the San Bernardino County Historical Archives, the San Bernardino County Museum, and the City of San Bernardino Historical and Pioneer Society.

## Sacred Lands File Search

On April 22, 2021, the California Native American Heritage Commission (NAHC) was contacted to request a search of the Sacred Lands File for the area of potential effects (APE). The Sacred Lands File is maintained by the NAHC and populated with information provided by California Native American tribes who have knowledge of the locations of tribal cultural resources. The purpose of this request was to determine whether any sacred lands have been identified within the APE by Native American tribes. The results of this search contribute to the overall assessment of tribal cultural resource sensitivity within the City of San Bernardino.

## Sensitivity Models

All information gathered through the SCCIC, NAHC, and literature reviews was synthesized to inform a cultural resources sensitivity model that identified areas of elevated potential for cultural resources based on prior survey coverage, resource density, and environmental and historical context. This sensitivity model identifies areas of High Sensitivity, Assumed High Sensitivity, and Low Sensitivity for cultural resources that could be affected by the various components of the proposed project, including archaeological sites and historic buildings, structures, and objects. The results of these models inform the impact of the proposed project on cultural resources.

## 3.5.4 Project Impact Analysis

**a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update is a regulatory document that sets forth the framework for future growth and development within the city and does not directly result in development. The adoption of the General Plan Update would not lead to the demolition or material alteration of any historic resources. However, future development allowed under the General Plan Update, consistent with the development code or land use designations, could impact historic resources within the city.

SBMC Chapter 15.37, Historic Building Demolition, states that no building or structure 50 years old or older shall be demolished unless a valid demolition permit has been issued. Buildings and structures 50 years old or older proposed for demolition shall be evaluated to determine if they have historical significance through a historic resource evaluation report (Section 15.37.050, Historic Resource Evaluation Report, of the SBMC). In addition, the proposed General Plan includes policies that would further protect historic resources, as listed in Table 3.5-2, *Historic Resources: Proposed General Plan Update Policies*. Specifically, Policy CR-2.7 would require City-owned properties containing or adjacent to historic resources to be maintained in a manner that is aesthetically and/or functionally compatible with such resources, and Policy CR-2.8 would require environmental review to be conducted on all applications (e.g., grading, building, and demolition) for resources designated or potentially designated as historically significant.

### Table 3.5-2 Historic Resources: Proposed General Plan Update Policies

| | |
|---|---|
| **Cultural Resources Element** | |
| CR-1.1 | **Cultural Resources Index.** Consider identifying, mapping, and designating historic, archaeological, and other resources of significance in San Bernardino for review and eventual ratification by the City Council. |
| CR-1.3 | **Commission Involvement.** Continue the role of the Arts and Historical Preservation Commission in advising the Mayor, City Council, Planning Commission, and staff in matters pertaining to the arts, culture resources, and historic preservation in San Bernardino. |
| CR-2.1 | **Historic Resources Survey.** Consider updating the historic resources survey of historic and architectural resources and integrating it into the City's planning and historical preservation process. |
| CR-2.2 | **Historic District and Overlay Zones.** Consider identifying and designating a historic district and overlay zone ordinances as deemed necessary to recognize places or areas of historic significance and preservation. |
| CR-2.3 | **Adaptive Reuse**. Encourage the reimagining and repurposing of designated historical buildings in commercial areas to preserve, maintain, and enhance buildings for future generations |
| CR-2.4 | **Historic Preservation Ordinance.** Consider adoption of a historic preservation ordinance that authorizes the City to designate resources deemed of significance as a City historical landmark or district. |
| CR-2.5 | **Development Review Process.** Plan for historic preservation of resources early in the development review process through early consultation with property owners, land developers, and community stakeholders. |
| CR-2.6 | **Historic Building Renovation and Retention.** Encourage preservation, maintenance, enhancement, and reuse of historic buildings and relocation of existing residential homes when retention on-site is infeasible. |
| CR-2.7* | **Maintenance of City Properties.** Require City-owned properties containing or adjacent to historic resources to be maintained in a manner that is aesthetically and/or functionally compatible with such resources. |
| CR-2.8* | **Environmental Review.** Require environmental review to be conducted on all applications (e.g., grading, building, and demolition) for resources designated or potentially designated as historically significant. |

* Denotes mitigating policies

These policies and the provisions of the SBMC mitigate potential impacts to historical resources through planning, documentation, and project-level review. However, historic structures and sites that are potentially eligible for future historic resource listing may be vulnerable to development activities associated with infill, redevelopment, or revitalization that would be accommodated by land use, zoning, and development code changes facilitated by the General Plan Update . The placement of new buildings adjacent to a historic resource may result in indirect impacts on access, visibility, and visual context, and renovations or modifications to

historic resources may deteriorate or destroy the characteristics that make those resources important or unique. Additionally, other buildings or structures that could meet National Register of Historic Places (NRHP) criteria upon reaching 50 years of age might be impacted by development or redevelopment activity accommodated by the General Plan Update.

Although the General Plan Update includes protective policies, and the SBMC provides regulatory mechanisms for historic resource evaluation and mitigation, potential impacts to historical resources remain because of the scope of development the General Plan Update facilitates. Therefore, this impact is considered **potentially significant**.

**Significance without Mitigation:** Potentially significant.

**Impact CUL-1a: Implementation of the General Plan Update would impact historical resources.**

> **Mitigation Measure CUL-1:** Project applicants shall complete site-specific evaluations at the time that individual projects are proposed at or adjacent to buildings that have been identified by the Built Environment Sensitivity Model (see Figure 3-5-1, *Built Environment Sensitivity*), as having high or assumed high sensitivity, or for structures that could meet National Register of Historic Places (NRHP) criteria, to determine if they are historical resources as defined by CEQA. This evaluation shall be carried out by a professional who meets the Secretary of the Interior's Standards for Architectural History, and the results of the evaluation shall be submitted as a Historic Architectural Assessment Report to the City of San Bernardino. Once the report is reviewed and approved by the City, a copy of the report should be submitted to the South Central California Information Center (SCCIC). CEQA Guidelines Section 15064.5(b)(3) states that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), by Weeks and Grimmer, shall be considered mitigated to a level of less than significant. Therefore if, under the project-by-project review described above, a structure is determined to be a historical resource as defined by CEQA, the Secretary of the Interior's guidelines referenced above shall be followed for demolition, rehabilitation, and/or alteration projects. In addition, Historic American Building Survey/Historic American Engineering Record (HABS/HAER) documentation of the resource shall be prepared. The level of documentation should be described in HABS documentation level II, which includes, at a minimum, measured drawings such as as-builts or original design plans; historic photographs, if available; current large-format photographs of significant architectural

design features; and written history and description. The documentation shall be submitted to the City of San Bernardino.

**Significance with Mitigation:** Significant and unavoidable. Although Mitigation Measure CUL-1 requires site-specific historical evaluations and adherence to the Secretary of the Interior's Standards, these measures may not fully prevent the loss of historical integrity or contextual value for some resources under the General Plan Update. The General Plan Update facilitates long-term growth and infill development across the city by allowing changes to land use designations, increasing residential and mixed-use densities, and revising development standards. While the General Plan Update includes cultural resource policies and is supported by SBMC Chapter 15.37, it is a high-level policy document and does not provide project-level design standards or parcel-specific historic resource protections. As a result, future development or redevelopment projects enabled by the General Plan may lead to indirect or direct impacts to known or yet unidentified historical resources, particularly through demolition, substantial alterations, or changes to their surrounding visual or spatial context. As a result, even with implementation of Mitigation Measure CUL-1, some historic resources may be lost or significantly altered in ways that cannot be fully mitigated. Therefore, despite implementation of feasible mitigation, impacts to historical resources under the General Plan Update remain **significant and unavoidable.**

## DOWNTOWN SPECIFIC PLAN

Table 3.5-1 identifies the presence of historic resources within the DTSP Area. Some of these recognized historic properties are in areas where new development potential is anticipated under the DTSP. As such, future development throughout the DTSP buildout could impact historical resources, particularly if historic buildings are demolished or materially altered to accommodate new construction.

SBMC provides a level of protection for such resources. Specifically, Chapter 15.37 prohibits the demolition of any building or structure over 50 years old without a valid demolition permit. The City evaluates the historical significance of these structures using criteria outlined in Section 15.37.055. If a structure meets any of the criteria, the applicant must prepare a Historic Resource Evaluation Report, which includes historical context and recommendations for preservation or mitigation.

Future development through DTSP could still compromise the historic integrity of these resources. Potential Buildout, of the DTSP, potential development could occur that is incompatible with the setting, scale, or spatial relationships that contribute to the significance of nearby historic properties. For example, height, massing, and bulk of new development that is not compatible to existing historic context could result in indirect but substantial adverse changes.

The DTSP plans for high-intensity and high-density uses, typically through vertically integrated mixed-use development with no height limits. While DTSP does acknowledge historic resources, it provides only limited development standards directly related to their protection. These include:

- Projects involving designated historic resources or those in Downtown Neighborhood Districts are exempt from public art design standards.
- Adaptive reuse eligibility applies to historic buildings but does not override state or federal preservation standards or requirements.
- Projects may be modernized where necessary to maintain aesthetic integrity or preserve cultural and historic identity, subject to the determination of the Director.

While these provisions encourage preservation through adaptive reuse, they lack enforceable design standards to ensure compatibility between new development and adjacent historic resources. However, future development under the DTSP would also be subject to the proposed General Plan's updated policies listed in Table 3.5-2, which provide additional protection. For example, Policy CR-2.7 requires City-owned properties containing or adjacent to historic resources to be maintained in a manner that is aesthetically and/or functionally compatible with such resources. Policy CR-2.8 mandates environmental review for all applications involving grading, building, or demolition that may affect designated or potentially significant historical resources. These policies, together with SBMC requirements, would reduce the likelihood of adverse impacts on historic resources. However, they may not eliminate them entirely, especially in cases where future historic resources are not yet identified or evaluated, indirect impacts occur through changes to the surrounding setting or context, or incompatible infill development alters the character of historic neighborhoods.

Although local policies and regulations would reduce potential impacts, the implementation of the DTSP could result in direct or indirect impacts to existing or future historic resources, including loss of integrity, visual context, or physical characteristics. Therefore, this impact is considered **potentially significant.**

**Impact CUL-1b: Implementation of the Downtown Specific Plan would impact historical resources.**

**Mitigation Measures**: Implement Mitigation Measure CUL-1.

**Significance with Mitigation:** Significant and unavoidable. Although Mitigation Measure CUL-1 requires site-specific historical evaluations and adherence to the Secretary of the Interior's Standards, these measures may not fully prevent the loss of historical integrity or contextual value for some resources under the DTSP. The proposed project facilitates long-term growth and infill development across the city by allowing changes to land use designations, increasing residential and mixed-use densities, and revising development standards. While the proposed

General Plan includes cultural resource policies and is supported by SBMC Chapter 15.37, the proposed General Plan is a high-level policy document and does not provide project-level design standards or parcel-specific historic resource protections. As a result, future development or redevelopment projects enabled by the DTSP may lead to indirect or direct impacts to known or yet unidentified historical resources, particularly through demolition, substantial alterations, or changes to their surrounding visual or spatial context.

The DTSP encourages high-intensity, high-density development, especially within the Downtown Core where there are no height limits, and existing historic buildings may be adjacent to or replaced by new construction. As a result, even with implementation of Mitigation Measure CUL-1, some historic resources may be lost or significantly altered in ways that cannot be fully mitigated. Therefore, despite implementation of feasible mitigation, impacts to historical resources under the DTSP remain **significant and unavoidable**.

### b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

There are areas that have High, Assumed High, and Low Sensitivity for archaeological and/or built environment resources. High Sensitivity areas are known to have greater potential for containing archaeological resources, both visible and subsurface, and any development within these areas must be approached with caution. For such locations, there is a higher likelihood that significant archaeological resources may be present and could be adversely affected by ground-disturbing activities. Even in areas of Low or Assumed High Sensitivity, where previous surveys may be limited or outdated, the possibility remains of encountering buried archaeological resources. Table 3.5-3, *Archaeological Resources: General Plan Update Policies*, shows all the policies that would protect archaeological resources. However, due to the scale of the General Plan Update and Development Code, archeological impacts could still occur. Therefore, impacts are **potentially significant.**

### Table 3.5-3 Archaeological Resources: General Plan Update Policies

| | |
|---|---|
| **Cultural Resources Element** | |
| CR-1.1 | **Cultural Resources Index.** Consider identifying, mapping, and designating historic, archaeological, and other resources of significance in San Bernardino for review and eventual ratification by the City Council. |
| CR-3.1 | **Archaeological Resources Survey.** Consider preparing an inventory of archaeological resources citywide based on archaeological sensitivity maps and project-based information provided during the entitlement process |
| CR-3.2 | **Archaeological Protection Policy.** Develop policy and administrative procedures to ensure the conservation of significant archaeological sites, districts, landscapes, sacred places, etc. in San Bernardino. |
| CR-3.3 | **Paleontological Resource Protection.** Ensure conservation of significant archaeological sites, districts, and landscapes via compliance with all applicable state and federal laws and required mitigation. |
| CR-3.4 | **Resource Sensitivity Maps.** Consider the preparation of resource archaeological and paleontological sensitivity maps to help recognize important resources, inform land use decisions, and preserve resources. |
| CR-3.7 | **Cultural Resources Staffing.** Designate City staff who are responsible for recording, tracking, and maintaining a list of important archaeological and paleontological resources in the community. |

**Significance without Mitigation:** Potentially significant.

**Impact CUL-2a: The General Plan Update would impact archeological resources.**

**Mitigation Measure CUL-2:** Prior to any ground-disturbing activities that excavate previously undisturbed soils, the project applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards to prepare a Phase I archaeological resources study consistent with the California Environmental Quality Act (CEQA) and/or Section 106 of the National Historic Preservation Act, as applicable.

**Records and Field Review:** The study shall include a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). A search of the Sacred Lands File conducted by the Native American Heritage Commission (NAHC). A field survey using standard archaeological field methods that meet the standards of the Secretary of the Interior (SOI).

**Potential Discovery:** If archaeological resources are identified during the study or during construction, they shall be evaluated for significance under the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). If any resources are found to be significant and could be impacted by project activities, appropriate treatment measures—such as avoidance, preservation in place, or data recovery—shall be developed and implemented by the qualified archaeologist in coordination with the City.

If recommended by the archaeologist based on site sensitivity and study results, archaeological monitoring during initial ground-disturbing activities may be required. All findings, evaluations, and treatment measures shall be documented in a technical report submitted to the City for review and inclusion in the project's environmental record.

**Significance with Mitigation:** Significant and unavoidable. While the General Plan Update includes policies intended to protect archaeological resources (see Table 3.5-2) and Mitigation Measure CUL-2 establishes procedures for evaluation, documentation, and treatment of resources, development activities in the General Plan Update Area may still inadvertently disturb or damage archaeological resources and impacts would be **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

There are portions in the DTSP Area that have high, assumed high, and low archaeological sensitivity. This indicates that there is potential for archeological resources to exist in undisturbed soils in the DTSP Area. The General Plan Update includes policies that would protect archeological resources as listed in Table 3.5-2. However, as development occurs throughout the DTSP Area, impacts on archeological resources would occur. Therefore, this impact is **potentially significant**.

**Impact CUL-2b: Implementation of the Downtown Specific Plan would impact archeological resources.**

**Significance without Mitigation:** Potentially Significant.

**Mitigation Measures**: Implement Mitigation Measure CUL-2.

**Significance with Mitigation:** Significant and unavoidable. While the General Plan Update includes policies intended to protect archaeological resources (see Table 3.5-2) and Mitigation Measure CUL-2 establishes procedures for evaluation, documentation, and treatment of resources, development activities in the DTSP Area may still inadvertently disturb or damage archaeological resources and impacts would be **significant and unavoidable**.

**c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

California Health and Safety Code, Section 7050.5; CEQA Guidelines Section 15064.5; and Public Resources Code, Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered on a project site, excavation or disturbance of the site shall cease until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority, and if the coroner recognizes or has reason to believe the human remains are those of a Native American, he or she shall contact the Native American Heritage Commission by telephone within 24 hours. Soil-disturbing activities associated with development in accordance with the General Plan Update could result in the discovery of human remains.

Compliance with Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 would ensure that potential impacts to human remains would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The majority of the DTSP Area has been graded, paved, and excavated, and currently contains residential and non-residential uses. Although, unlikely, the discovery of any human remains existing within the DTSP Area could still occur. However, any human remains encountered during ground-disturbing activities associated with future development under implementation of the DTSP Area would be subject to federal, State, and local regulations, such as the California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e) (CEQA), which state the mandated procedures of conduct following the discovery of human remains. Compliance with Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 would ensure that potential impacts to human remains would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.5.5 Cumulative Impact Analysis

Cumulative impacts to cultural resources consider the effects of the proposed project in combination with other past, present, and reasonably foreseeable future development throughout the City of San Bernardino and the surrounding region. The cumulative context for cultural resources includes both the citywide area affected by the General Plan Update and the more focused DTSP Area, which is anticipated to undergo intensification and redevelopment. Future development citywide may include residential, commercial, mixed-use, and infrastructure projects that involve ground disturbance or the modification of existing structures, some of which may be of historical or archaeological significance.

**Would the project have a cumulative effect related to cultural resources?**

The General Plan Update facilitates long-term growth and land use intensification throughout the city, including areas with known or potential cultural resources. While the General Plan Update does not propose specific development projects, it enables future growth that could result in direct or indirect impacts to historic buildings, archaeological sites, or unknown subsurface resources. Likewise, the DTSP encourages high-density, vertical development in the downtown core, which contains multiple recognized and potential historical resources, as well as areas of high archaeological sensitivity.

When considered with other cumulative projects across the city, this scale of redevelopment increases the potential for impacts on cultural resources through demolition, alteration, ground disturbance, and changes to the visual and spatial context of historic settings. These cumulative impacts could include incremental loss of integrity for historic buildings, incompatibility between new construction and existing historical fabric, or the destruction of subsurface archaeological or burial sites.

Although local regulations, CEQA compliance requirements, and policies in the General Plan Update provide a framework for resource protection, the cumulative level of development anticipated by the proposed project and other planned growth could still result in significant and irreversible changes to the city's cultural landscape. Furthermore, while not all individual projects may have significant cultural resource impacts, the incremental contribution of many small or moderate projects across the city could be cumulatively considerable, especially in older or culturally sensitive areas.

Mitigation Measures CUL-1 and CUL-2 require project-level identification and treatment of historical and archaeological resources, including pre-construction studies and adherence to professional standards. These measures would reduce individual project impacts, and when applied broadly across cumulative development, would also reduce the project's contribution to cumulative impacts. These measures will be applied to all future development facilitated by the General Plan Update and DTSP, ensuring consistency with CEQA and state and federal

requirements for cultural resource protection. Nonetheless, federal, state, and local regulations that provide protection for historical resources may not always be feasible. For these reasons, and notwithstanding implementation of mitigation, future development facilitated by the proposed project could potentially result in a **cumulatively considerable** and **potentially significant** impact on historic resources.

**Impact CUL-3: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative impacts to historic and archaeological resources.**

**Mitigation Measures:** Implement Mitigation Measures CUL-1 and CUL-2.

**Significance with Mitigation:** Significant and unavoidable. Development under the proposed project has the potential to result in significant adverse impacts on historic and archaeological resources. While Mitigation Measures CUL-1 and CUL-2 would reduce impacts to the extent possible, impacts at this level cannot be mitigated to less than significant and would remain **significant and unavoidable and cumulatively considerable.**

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# 3.6 ENERGY

This section of the Draft EIR evaluates the energy implications of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, referred to together as the "proposed project" in a local and regional context. The analysis in this section is based on the existing electricity and natural gas uses in the City of San Bernardino provided by reports from Southern California Edison (SCE) and Southern California Gas Company (SoCalGas) (see Appendix C). In addition, this section qualitatively analyzes transportation energy by evaluating daily vehicle miles traveled from the data provided by KOA (see Appendices I-1 through I-3).

## Terminology

The following are definitions for terms used throughout this chapter:

- **CBSC:** California Building Standards Code.
- **CALGreen:** California Green Building Standards Code.
- **CNG:** Compressed natural gas.
- **BTU:** British thermal units.
- **kBTU:** Kilo-British thermal units.
- **kW:** Kilowatt.
- **kWh:** Kilowatt-hours.
- **VMT:** Vehicle miles traveled.

## 3.6.1 Regulatory Framework

### FEDERAL

### Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The Act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of U.S. crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE Standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the US Environmental Protection Agency (EPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established

new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021–2026.

On June 7, 2024, NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027-2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030-2035. The final rules establish standards that would require an industry fleet-wide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027-2031) and for light trucks (model years 2029-2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030-2032) and 8 percent per year (model years 2033-2035) (NHTSA 2024).

### *Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles*

In 2024, the USEPA issued a final rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with MY 2027 (USEPA 2025a).

### *2025 Rollback of CAFE and Federal Fuel Standards*

While both the new CAFE standards and fuel standard are currently in effect, the Trump Administration directed the Department of Transportation to rescind and replace all existing CAFE standards and emissions standards on January 29, 2025. This action targeted regulations covering MY 2024 through 2035 for both light-duty and heavy-duty vehicles.

On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electric vehicles (EVs). California currently has no authority to implement these standards.

On June 11, 2025, the NHTSA published the final rule, "Resetting the Corporate Average Fuel Economy Program." This rule does not immediately change current fuel economy standards; however, the rule clarifies the NHTSA's interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered electric vehicles (EVs) when identifying the "maximum feasibility" average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

## Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act sets increased corporate average fuel economy standards; the renewable fuel standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2025b).

## Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. This Act includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

## National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

## Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

## STATE

### Warren-Alquist Act

Established in 1974, the Warren-Alquist Act created the California Energy Commission (CEC) in response to the energy crisis of the early 1970s and the state's unsustainable growing demand for energy resources. The CEC's core responsibilities include advancing State energy policy, encouraging energy efficiency, certifying thermal power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The Warren-Alquist Act is updated annually to address current energy needs and issues, and its latest edition was in January 2023.

### California Public Utilities Commission

In September 2008, the California Public Utilities Commission adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision and goals for each economic sector, identifying specific near-term, midterm, and long-term strategies to assist in achieving these goals. This plan sets the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.[1]
- All new commercial construction in California will be zero net energy by 2030.
- Heating, ventilation and air conditioning, commonly referred to as "HVAC," will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long-Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space accounts for 38 percent of the State's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, and space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility

[1] Zero net energy buildings are buildings where the total amount of energy used by the building on an annual basis is equal to or less than the amount of renewable energy created on the site.

types for electricity and gas consumption, accounting for approximately 10 percent of State's electricity and gas use (CPUC 2011).

The California Public Utilities Commission and the CEC have adopted the following goals to achieve zero net energy levels by 2030 in the commercial sector:

**Goal 1:** New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.

**Goal 2:** 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.

**Goal 3:** Transform the commercial lighting market through technological advancement and innovative utility initiatives.

## California Energy Commission California Energy Demand Forecast

The CEC assesses and forecasts the state's energy systems and trends. This includes forecasts for electricity consumption, retail sales, and peak demand for each of the five major electricity planning areas and the whole state. The CEC Forecast include three demand scenarios (low, mid, and high) to capture a reasonable range of demand outcomes over the next 14 years.[2]

- **Low-Demand.** The low-demand energy scenario includes lower economic or demographic growth and assumes higher rates and higher self-generation impacts.
- **Mid-Demand.** The mid-demand energy scenario uses input assumptions at levels between low and high scenarios. These scenarios are referred to as the *baseline cases*, meaning they do not include the additional achievable energy efficiency savings.
- **High-Demand.** The high-demand energy scenario incorporates relatively high economic or demographic growth and climate change impacts as well as relatively low electricity rates and self-generation impacts.

The most recent update to CEC Forecasts was in 2023 for the mid-demand scenario.

[2] The latest low-demand scenario forecast as of this analysis is from CEC's 2021-2035 forecast while baseline scenarios have been updated annually.

## *Renewables Portfolio Standard*

### *Senate Bills 1078, 107, and X1-2 and EO S-14-08*

The California Renewables Portfolio Standard (RPS) Program was established in 2002 under Senate Bills (SB) 1078 (Sher) and 107 (Simitian). The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the California legislature in 2011 (SB X1-2). The California Public Utilities Commission is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state. For year 2020, the three largest retail energy utilities each provided an average of 43 percent of its supplies from renewable energy sources. Community choice aggregators provided an average of 41 percent of their supplies from renewable sources (CPUC 2021).

### *Senate Bill 350*

Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB 350 also provides for the transformation of the California Independent System Operator into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by the California Independent System Operator to those markets, pursuant to a specified process.

### *Senate Bill 100*

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 established a new RPS requirement of 50 percent by 2026. Furthermore, the bill also establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the

bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

#### *Senate Bill 1020*

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

#### *AB 117 and SB 790*

Community Choice Aggregation is a program that allows cities, counties, and other qualifying governmental entities within the service areas of investor-owned utilities to purchase and/or generate electricity for their residents and businesses. This program was made possible in California by passage of Assembly Bill (AB) 117 (Migden, 2002) and SB 790 (Leno, 2011). AB 117 established Community Choice, and SB 790 strengthened it by creating a "code of conduct" that the incumbent utilities must adhere to in their activities relative to Community Choice.

### *Energy Efficiency Regulations*

#### *California Energy Code*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (California Code of Regulations [CCR], Title 24, Part 6, California Energy Code). The California Energy Code (Building Energy Efficiency Standards) requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

The 2025 Building Energy Efficiency Standards, adopted in 2024 and effective January 1, 2026, build upon the 2022 standards by further advancing energy efficiency and building decarbonization (CEC 2022a, 2025a). The 2025 update expands the use of high-efficiency electric heat pumps for space and water heating, strengthens electric-ready requirements to support future electrification, and enhances building envelope and ventilation standards to improve energy performance and indoor air quality. The standards also update and expand solar photovoltaic and battery storage requirements for certain residential and nonresidential building types and improve system controls to support grid reliability and demand flexibility. Overall, the 2025 standards are intended to further reduce energy consumption and to continue supporting California's long-term climate and energy goals.

### *California Green Building Standards Code*

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (CCR Title 24, Part 11, known as "CALGreen") includes mandatory requirements for new residential and nonresidential buildings throughout California. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update became effective on January 1, 2026, and updates residential and non-residential voluntary measures.

Overall, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impacts during and after construction. CALGreen contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

### *2008 California Energy Action Plan Update*

The 2008 Energy Action Plan Update provides a status update to the 2005 Energy Action Plan II, which is the state of California's principal energy planning and policy document. The Update continues the original Energy Action Plan (adopted in 2003), describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure that California's energy is adequate, affordable, technologically advanced, and environmentally sound. First-priority actions to address California's increasing energy demands are energy efficiency, demand response (i.e., reduction of customer energy usage during peak periods in order to address system reliability and support the best use of energy infrastructure), and the use of renewable sources of power. If these actions are unable to satisfy the increasing energy and capacity needs, the plan supports clean and efficient fossil-fired generation.

### *Appliance Efficiency Regulations*

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC and contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

## *Transportation-Sector-Specific Regulations*

### ***Assembly Bill 1493***

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduced GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the USEPA. In 2012, the USEPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (see also the discussion on the update to the CAFE standards under "Federal," above).

In January 2012, the California Air Resources Board (CARB) approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

### ***Executive Order N-79-20***

On September 23, 2020, EO N-79-20 was issued, which sets a time frame for the transition to zero-emissions (ZE) passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop and propose the following:

- Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs (zero-emission vehicles) sold in the California toward the target of 100 percent of in-state sales by 2035.
- Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035.
- Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the USEPA, and local air districts.

On August 25, 2022, CARB adopted the Advanced Clean Cars II regulations that codify the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, Advanced Clean Cars II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids.

### *Advanced Clean Fleets Regulation*

In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles (CARB 2023). In conjunction with the Advanced Clean Trucks regulation, the ACF regulations helps to ensure that medium- and heavy-duty ZEVs are brought to the market by requiring certain fleets to purchase them. The ACF ZEV phase-in approach sets clear targets for regulated fleets to make a full conversion to ZEVs.

The ACF regulations cover four main elements:

- **Manufacturer sales mandate.** Manufacturers may sell only zero-emission medium- and heavy-duty vehicles starting in 2036.
- **Drayage fleets.** Beginning January 1, 2024, trucks must be registered in the CARB Online System to conduct drayage activities in California. Non-zero-emission "legacy" drayage trucks could register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.
- **High priority and federal fleets.** High priority and federal fleets must comply with the Model Year Schedule or may elect to use the optional ZEV Milestones Option to phase-in ZEVs into their fleets:
    - **Model Year Schedule.** Fleets must purchase only ZEVs beginning 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life as specified in the regulation.
    - **ZEV Milestones Option (Optional).** Instead of the Model Year Schedule, fleets may elect to meet ZEV targets as a percentage of the total fleet starting with vehicle types that are most suitable for electrification.
- **State and local agencies.** State and local government fleets, including city, county, special district, and State agency fleets, would be required to ensure 50 percent of vehicle purchases are zero-emission beginning in 2024 and 100 percent of vehicle purchases are zero-emission by 2027. Small government fleets (those with 10 or fewer vehicles) and those in designated counties would start their ZEV purchases beginning in 2027. Alternately, State and local government fleet owners may elect to meet ZEV targets using the ZEV Milestones Option. State and local government fleets may purchase either ZEVs or near-ZEVs or a combination of ZEVs and near-ZEVs until 2035. Starting in 2035, only ZEVs will meet the requirements.

The ACF regulations also establish requirements that transform the medium- and heavy-duty vehicle sector and demonstrate independent utility through achievement of the following objectives:

- Achieve criteria and GHG emissions reductions consistent with the goals identified in the State Implementation Plan (SIP) Strategy and Scoping Plan.
- Provide emissions reductions in disadvantaged communities (DAC), thereby supporting the implementation of Assembly Bill (AB) 617 (Garcia, C., Chapter 136, Statutes of 2017).
- Support the goals of Executive Order N-79-20, which calls for accelerated ZEV deployment with these targets:
  - 100 percent ZE drayage by 2035.
  - 100 percent ZE trucks and buses where feasible by 2045.
  - Ensure requirements, such as ZEV deployment schedules and related infrastructure buildout, are technologically feasible, cost-effective, and support market conditions.
  - Lead the transition away from petroleum fuels and toward electric drivetrains.
  - Contribute towards achieving carbon neutrality in California pursuant to SB 100 and in accordance with EO B-55-18.
  - Mindfully set requirements to allow time for public ZE infrastructure buildout for smaller fleets or for regional haul applications who would be reliant on a regional network of public chargers.
  - Ensure manufacturers and fleets work together to place ZEVs in service suitably and successfully as market expands.
  - Establish a fair and level playing field among fleet owners.
  - Craft the proposed project in a way that ensures institutional capacity for CARB to manage, implement, and enforce requirements.

### *Energy Storage*

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The California Independent System Operator (CAISO) has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems, such as batteries, pumped hydroelectric storage, and

thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load serving entities (LSE) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

### *The Integrated Resource Plan*

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders, and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual Battery Energy Storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the State's electricity grid.

### *The Interconnection Queue*

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the Interconnection Queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid, and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

## REGIONAL

### SCAG's 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

## LOCAL

### City of San Bernardino General Plan

The existing City of San Bernardino General Plan was adopted in November 2005 (San Bernardino 2005). Existing goals and policies aimed at reducing energy impacts are primarily found in the Utilities Element, Natural Resources and Conservation Element, Energy and Water Conservation Element, as well as the Circulation Element.

### City of San Bernardino Municipal Code

The San Bernardino Municipal Code (SBMC) is organized by title, chapter, and sections. Most provisions related to energy impacts are in the following chapter:

- **Chapter 15.04, Building Codes.** This chapter of the SBMC adopts the State Building Code under Title 24, Sections Parts 1 through 6, 8, 9, and 11 of the CCR known and designated as the 2025 California Building Code.

## 3.6.2 Existing Conditions

### ELECTRICITY

Electricity is quantified using kilowatts (kW) and kilowatt-hours (kWh). A kW is a measure of 1,000 watts of electrical power and a kWh is a measure of electrical energy equivalent to a power consumption of 1,000 watts for one hour. The kWh is commonly used as a billing unit for energy delivered to consumers by electric utilities. A gigawatt is equal to one million kW.

### Southern California Edison

The General Plan Update Area is in SCE's service area, which spans much of southern California—from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north (SCE 2025). Total electricity demand in the SCE service area for the county was 16.206 billion kWh for 2024 (CEC 2025b).

Sources of electricity sold by SCE in 2023, the latest year for which data are available, were:

- 37.6 percent renewable, consisting mostly of solar and wind
- 4.5 percent large hydroelectric
- 20.0 percent natural gas
- 9.1 percent nuclear
- 0.1 percent other
- 28.8 percent unspecified sources—that is, not traceable to specific sources (CEC 2025c)[3]

As shown in Table 3.6-1, *Existing Electricity Demand*, total existing electricity demand in the General Plan Update Area is estimated at 1,255,555,522 kWh per year.

[3] The electricity sources listed reflect changes after the 2013 closure of the San Onofre Nuclear Generating Station, which is owned by SCE. Numbers are rounded up and may cause the total to not add up to exactly 100 percent.

**Table 3.6-1 Existing Electricity Demand**

| Area | Electricity Usage (kWh per year) |
|---|---|
| **General Plan Update Area** | |
| Residential | 434,418,046 |
| Nonresidential | 821,137,476 |
| **Subtotal** | **1,255,555,522** |

Source: Appendix C.

Note: The existing annual electricity usage was calculated as an average based on historical data provided by SCE for years 2022–2025.

## Natural Gas

Gas is typically quantified using the "therm," which is a unit of heat energy equal to 100,000 British thermal units (BTU) and is the energy equivalent of burning 100 cubic feet of natural gas (USEIA 2024). SoCalGas provides natural gas service in and has facilities throughout the City of San Bernardino. The service area of SoCalGas spans much of the southern half of California, from Imperial County on the southeast to San Luis Obispo County on the northwest to part of Fresno County on the north to Riverside County and most of San Bernardino County on the east (CEC 2022b). Total natural gas consumption in the SoCalGas service area for the county was 547.2 million therms for 2024 (CEC 2025d).

As shown in Table 3.6-2, *Existing Natural Gas Demand,* the existing natural gas demands in the General Plan Update Area are estimated at 36.7 million therms per year.

**Table 3.6-2 Existing Natural Gas Demand**

| Area | Natural Gas Usage (therms per year) |
|---|---|
| **General Plan** | |
| Residential | 20,545,971 |
| Nonresidential | 16,158,294 |
| **Subtotal** | **36,704,265** |

Source: Appendix C.

Note: The existing annual natural gas usage was calculated as an average based on historical data provided by SoCalGas for years 2022–2025.

### Transportation Fuels

California is one of the top consumers of fuel for transportation. The CEC produces a California Annual Retail Fuel Outlet Report every year, which is a compilation of gasoline and diesel fuel sales across the state, available at the county level. According to the CEC, San Bernardino County fuel sales totaled an estimated 920 million gallons of gasoline and 390 million gallons of diesel fuel in 2024 (CEC 2025e).

Table 3.6-3, *Existing Operation-Related Annual Fuel Usage*, shows the fuel usage associated with VMT currently generated under existing baseline conditions based on fuel usage data obtained from EMFAC2021 (v. 1.0.2) and VMT data provided by KOA (see Appendix I-1). VMT is based on vehicle trips beginning and ending in the city boundaries and from external/internal trips (i.e., trips that either begin or end in the city).

**Table 3.6-3 Existing Operation-Related Annual Fuel Usage**

| Fuel Type | Fuel Usage | |
|---|---|---|
| | **VMT** | **Gallons** |
| Gasoline | 2,399,271,002 | 93,036,281 |
| Diesel | 212,496,647 | 26,758,311 |
| Compressed Natural Gas | 14,447,971 | 2,453,078 |
| | **VMT** | **kWh** |
| Electricity | 112,348,677 | 42,558,735 |

Source: EMFAC2021, version 1.0.2 was used for this analysis because EMFAC 2025 Version 2.1.1 was not publicly available at the time the analysis was conducted, Appendix C.

Note: Based on daily VMT provided by KOA. VMT per year based on a conversion of VMT x 347 days per year to account for less travel on weekend, consistent with CARB statewide GHG emissions inventory methodology (CARB 2008).

## Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning energy. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning energy if it would:

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.

To determine whether the proposed project would result in wasteful, inefficient, or unnecessary consumption of energy resources, this analysis utilizes the guidance provided in Appendix F, *Energy Conservation*, of the CEQA Guidelines as well as the analytical precedent set by *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) (75 Cal.App.5th 63, 164–168).

According to Appendix F, Energy Conservation, of the CEQA Guidelines, CEQA analyses should consider energy conservation goals, including: decreasing overall per capita energy consumption; decreasing reliance on fossil fuels such as coal, natural gas, and oil; and increasing reliance on renewable energy sources. In *League to Save Lake Tahoe Mountain*, the Appellate Court ruled that the analysis of wasteful, inefficient, and unnecessary energy consumption was inadequate because it did not consider whether additional renewable energy features could be added to the project.

The proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines and the appellate court decision in *League to Save Lake Tahoe Mountain*, the following energy conservation goals are considered in determining whether the proposed project could result in wasteful, inefficient, or unnecessary consumption of energy resources:

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

It is important to note that these energy conservation goals are not used herein as bright-line significance thresholds but as an informative guide in assessing whether the proposed project could result in a potentially significant energy impact.

## METHODOLOGY

The energy and fuel usage information provided in this section are based on the following:

- **Energy (Natural Gas and Electricity)**: Energy use for residential and nonresidential land uses in the General Plan Update Area were estimated using electricity from SCE and natural gas data provided by SoCalGas. Forecasts are adjusted for increases in dwelling units for

residential natural gas use and non-residential square footage for non-residential natural gas use in the General Plan Update Area.

- **On-Road Fuel Use:** Fuel use was based on origin-destination method VMT provided by KOA and modeled using CARB's EMFAC2021 V.1.0.2 web database for calendar year 2025 (existing conditions) and 2050 emission rates.

## 3.6.3 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

#### Short-Term Construction Impacts

The General Plan Update is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Construction of individual development projects facilitated by the General Plan Update would create temporary demands for electricity. Natural gas is not generally required to power construction equipment and therefore is not anticipated during construction phases. Electricity use would fluctuate according to the phase of construction. Additionally, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

Future individual development projects would also temporarily increase demands for energy associated with transportation. Transportation energy use depends on the type and number of trips, VMT, fuel efficiency of vehicles, and travel mode. Energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that most off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. In addition, all operation of construction equipment would cease upon completion of project construction.

Furthermore, the construction contractors would minimize nonessential idling of construction equipment during construction in accordance with the California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449. Such required practices would limit wasteful and unnecessary energy consumption during the construction of individual development projects facilitated by the General Plan Update. Therefore, the construction of individual development

projects facilitated by the General Plan Update would not result in wasteful, inefficient, or unnecessary consumption of fuel use (energy resources). Impacts related to construction-related energy would be **less than significant**.

## Long-Term Impacts During Operation

Operation of new development projects accommodated under the General Plan Update would create additional demands for electricity and natural gas compared to existing conditions. Operational use of electricity and natural gas would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; use of on-site equipment and appliances; and lighting.

### *Nontransportation Energy*

Electrical service to the city is provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 3.6-4, *Year 2050 Forecast Electricity Consumption*, by horizon year 2050, electricity use in the General Plan Update Area would increase by 533,325,009 kWh/year, or approximately 42 percent, from existing conditions.

**Table 3.6-4 Year 2045 Forecast Electricity Consumption**

| Area | Electricity Usage (kWh per year) | | |
|---|---|---|---|
| | Existing Baseline[1] | Year 2050 Forecast[2] | Net Change |
| General Plan | | | |
| Residential | 434,418,046 | 634,939,012 | 200,520,966 |
| Nonresidential | 821,137,476 | 1,153,941,520 | 332,804,043 |
| Total | 1,255,555,522 | 1,788,880,532 | 533,325,009 |

Source: Appendix C.

1. The existing annual electricity usage was calculated as an average based on historical data provided by SCE for years 2022-2025.

2. Residential energy and nonresidential energy forecasts are adjusted for increases in dwelling units and non-residential square footage, respectively, and do not account for reductions due to increase in energy efficiency from compliance with future Building Energy Efficiency Standards and updates to CALGreen.

As shown in Table 3.6-5, *Year 2050 Forecast Natural Gas Consumption*, existing natural gas use in the General Plan Update Area would increase by 16,032,615 therms annually, or approximately 44 percent, from existing conditions.

### Table 3.6-5 Year 2050 Forecast Natural Gas Consumption

| Area | Natural Gas Usage (therms per year) | | |
|---|---|---|---|
| | Existing Baseline[1] | Year 2050 Forecast[2] | Net Change |
| General Plan | | | |
| Residential | 20,545,971 | 30,029,688 | 9,483,717 |
| Nonresidential | 16,158,294 | 22,707,192 | 6,548,898 |
| Total | 36,704,265 | 52,736,881 | 16,032,615 |

Source: Appendix C.

1. The existing annual natural gas usage was calculated as an average based on historical data provided by SoCalGas for years 2022-2025.

2. Residential energy and nonresidential energy forecasts are adjusted for increases in dwelling units and non-residential square footage, respectively, and do not account for reductions due to increase in energy efficiency from compliance with the Building Energy Efficiency Standards and CALGreen.

While the electricity and natural gas demand for the General Plan Update Area would increase compared to existing conditions, development accommodated under the General Plan Update would be required to comply with the current and future updates to the Building Energy Efficiency Standards and CALGreen, which would contribute to reducing the energy demands shown in Tables 3.6-4 and 3.6-5. New and replacement buildings in compliance with these standards would generally have greater energy efficiency than existing buildings. It is anticipated that each update to the Building Energy Efficiency Standards and CALGreen would result in greater building energy efficiency and move closer toward buildings achieving ZNE.

In addition to the Building Energy Efficiency Standards and CALGreen, the General Plan Update includes policies to increase energy efficiency and reduce wasteful, inefficient use of energy resources (refer to Table 3.6-6, *Energy: Proposed General Plan Update Policies*). Specifically, Policies LU-6.3, LU-6.4, LU-6.9, UI-5.1, UI-5.2, and UI-5.3 would support energy efficiency and renewable energy improvements for future commercial, industrial, and City facility projects. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies would further reduce energy consumption and move closer to achieving ZNE goals.

### Table 3.6-6 Energy: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-6.1 | **Urban form to reduce GHG emissions**. Promote residential, commercial, and industrial development within urbanizing areas that is compact, pedestrian friendly, and served by transportation options along major corridors and in key activity areas. |
| LU-6.2 | **Adaptive reuse of buildings for sustainability.** Encourage the adaptive reuse of existing structures, buildings, and improvements to minimize water and energy use, capitalizing on a building's embodied energy, and supporting environmental sustainability. |
| LU-6.3 | **Net-zero buildings.** Encourage new or expanded commercial and industrial projects exceeding 100,000 square feet of gross floor area, such as big-box stores, warehouses, distribution centers, and similar uses, to set a goal to achieve net zero energy and water uses. |
| LU-6.4 | **Measures to reduce GHG emissions from buildings.** Encourage incorporation of measures to reduce or eliminate preventable GHG emissions in new projects exceeding 100,000 square feet of gross floor area. Measures may include, but are not limited to:<br>▪ Reducing on-site energy consumption.<br>▪ Increasing on-site energy generation and storage.<br>▪ Supporting renewable energy projects in the city.<br>▪ Reducing vehicle trips and waste generation. |
| LU-6.5* | **Transportation measures to reduce GHG emissions.** Implement multi-modal transportation improvements, transportation demand management programs, and encourage use of mass transit, car-pooling, ridesharing, and telecommuting in accordance with policy and program guidance in the Circulation Element. |
| LU-6.6* | **Sustainable landscapes.** Require new development projects to use and encourage existing development to retrofit properties to use low impact landscaping techniques that enhance habitat quality, reduce water use, support a diverse ecosystem, and increase resilience to a changing climate. |
| LU-6.7* | **Heat island mitigation**. Require private development to incorporate measures that are intended to materially reduce the heat island effect and promote climate resiliency through measures such as:<br>▪ Planting trees and landscaping.<br>▪ Installing green or cool roofs.<br>▪ Increased tree canopy in parking lots.<br>▪ Cooler permeable pavements.<br>▪ Orienting buildings for passive cooling. |
| LU-6.9 | **Alternative energy generation sources.** Promote and facilitate technologies that reduce the burning of fossil fuels and their deleterious impact on the environment. Examples include, but are not limited to:<br>▪ Alternative (non-fossil fuel) fueling stations and power sources for autos and trucks. |

### Table 3.6-6 Energy: Proposed General Plan Update Policies

| | |
|---|---|
| | ▪ Alternative energy sources, including hydroelectricity, solar, and wind to the extent feasible.<br>▪ Emergent zero emission technology for trains and mass transit alternatives**.** |
| LU-10.7 | **Pedestrian-oriented development.** Promote the siting and design of commercial and mixed-use developments in a manner that encourages users to access and engage with each building as a pedestrian, while deprioritizing accommodation for single occupancy vehicles. |
| **Circulation and Mobility Element** | |
| CM-2.4 | **Walkways, paseos, and shared-use paths.** Identify and expand the City's pedestrian and bicycle network to include creative and context-sensitive opportunities, including but not limited to: paseos and walkways, shared use paths along abandoned rail tracks (rail trails). |
| CM-2.13* | **Complete street improvements.** Require land developers to adhere to the Complete Streets approach for projects that will impact the roadway right-of-way; the improvements should include bicycle and pedestrian facilities that provide connectivity to public transit facilities (if within ½ mile distance). |
| CM-2.14 | **Regional multi-modal transportation network.** Support partner agencies, such as Caltrans, SBCTA, Omnitrans, rail authorities, and adjacent jurisdictions on projects that will contribute to a regional and seamless multi-modal transportation network. |
| CM-3.4 | **Mobility hubs.** Enhance mobility hubs at major points of interest, such as the Downtown Transit Center, Santa Fe Depot, and Cal State campus, with programs such as bike-sharing, scooter-sharing, and EV charging stations. |
| CM-4.1 | **TDM ordinance.** Develop and implement a citywide Transportation Demand Management Ordinance, including incentives for new developments to provide clarity and additional guidance for the Traffic Impact Analysis Guidelines on how to mitigate VMT. |
| CM-4.2 | **TDM strategies.** Promote TDM strategies appropriate for the local context and land use, for example, to reduce employee commute trips or to reduce discretionary trips such as residential, shopping, or other. |
| CM-4.3* | **TDM in new development.** Require new developments to prioritize the incorporation of TDM strategies into project design at the outset as a means to reduce vehicle miles traveled (VMT) and improve air quality. |
| CM-7.2 | **Green energy.** Explore opportunities to accommodate new vehicle technology and alternative fuels by siting new charging/fuel stations, acquiring new vehicles, and implementing other measures to reduce GHG emissions from the City's transportation sector. |
| **Open Space and Conservation Element** | |
| OSC-7.9 | **Alternative transportation.** Support the expansion of alternatives to single-occupancy vehicle use, including but not limited to:<br>▪ Expanding the number and frequency of bus routes. |

### Table 3.6-6 Energy: Proposed General Plan Update Policies

| | |
|---|---|
| | ▪ Extending commuter rail infrastructure and trains.<br>▪ Building out the full pedestrian and bicycle network.<br>▪ Working with Omnitrans to support rider incentives. |
| **Utilities and Infrastructure Element** | |
| UI-5.1 | **Public facility and infrastructure energy use**. As cost feasible, maximize energy efficiency without reducing public safety or service levels by incorporating proven energy advancements in City facilities and infrastructure:<br>▪ Street infrastructure such as lighting, signals, etc.<br>▪ Buildings and facilities, both interior and exterior.<br>▪ City fleet, public transit, and trains<br>▪ Water, sewer, and other infrastructure. |
| UI-5.2 | **Energy efficient building design**. Encourage and require, to the extent applicable, the incorporation of best practices in the design and operation of buildings. Examples include:<br>▪ Passive and active solar and wind design concepts.<br>▪ Cool roofs, green roofs, and rooftop gardens.<br>▪ Energy efficiency internal building components. |
| UI-5.3 | **Renewable energy systems in new development**. Increase the installation of on-site renewable energy systems, battery storage, and micro-grids in projects encourage buildings to install such systems. |
| UI-5.4 | **Solar energy.** Continue to support and facilitate the expansion of solar energy projects on residential units, nonresidential, and public facilities through incentives, development codes, and public education. |
| UI-5.5 | **Alternative energy generation**. Diversify the City's energy portfolio through the development of alternative energy technologies that include, but are not limited to:<br>▪ Methane recovery from landfills and fuel cells.<br>▪ Energy generation at wastewater treatment plants.<br>▪ Hydroelectricity from water infrastructure turnouts.<br>▪ Geothermal energy at City facilities where feasible. |
| UI-6.3 | **Interagency consultation.** Work with all public utilities providers to ensure that adequate electricity, natural gas, and communication facilities are available to meet the demands of the city, including new developments. |

*Denotes mitigating policies

### *Transportation Energy*

The growth accommodated under the General Plan Update would consume transportation energy from the use of motor vehicles (e.g., gasoline, diesel, compressed natural gas, and electricity). Table 3.6-7, *Operation-Related Annual Fuel Usage: Net Change from Existing,* shows the net change in VMT, fuel usage, and fuel efficiency under horizon year 2050 conditions from existing baseline year 2025 conditions and existing uses under year 2050 conditions.

### Table 3.6-7 Operation-Related Annual Fuel Usage: Net Change from Existing

| Fuel Type | Existing Baseline | Existing Year 2050[1] | Year 2050 | Net Change from Existing Baseline | Net Change from Existing Year 2050 |
|---|---|---|---|---|---|
| Gasoline | | | | | |
| VMT[2] | 2,399,271,002 | 2,162,893,953 | 2,600,062,493 | 200,791,492 | 437,168,540 |
| Gallons | 93,036,281 | 67,087,981 | 80,647,940 | -12,388,341 | 13,559,960 |
| Miles Per Gallon | 25.79 | 32.24 | 32.24 | 6.45 | 0.00 |
| Diesel | | | | | |
| VMT[2] | 212,496,647 | 222,805,778 | 267,839,737 | 55,343,089 | 45,033,959 |
| Gallons | 26,758,311 | 26,024,125 | 31,284,175 | 4,525,864 | 5,260,049 |
| Miles Per Gallon | 7.94 | 8.56 | 8.56 | 0.62 | 0.00 |
| Compressed Natural Gas | | | | | |
| VMT[2] | 14,447,971 | 9,866,132 | 11,860,294 | -2,587,677 | 1,994,163 |
| Gallons | 2,453,078 | 1,330,458 | 1,599,373 | -853,705 | 268,915 |
| Miles Per Gallon | 5.89 | 7.42 | 7.42 | 1.53 | 0.00 |
| Electricity | | | | | |
| VMT[2] | 112,348,677 | 342,998,434 | 412,325,978 | 299,977,301 | 69,327,544 |
| kWh | 42,558,735 | 221,705,730 | 266,517,345 | 223,958,610 | 44,811,615 |
| Miles Per kWh | 2.64 | 1.55 | 1.55 | -1.09 | 0.00 |
| Total VMT | 2,738,564,297 | 2,738,564,297 | 3,292,088,502 | 553,524,205 | 553,524,205 |

Sources: EMFAC2021 Version 1.0.2 was used for this analysis because EMFAC2025 Version 2.1.1 was not publicly available at the time the analysis was conducted; Appendix C.

1. Represents existing uses as they currently exist in baseline year 2025 operating under year 2050 conditions.

2. Based on daily VMT provided by KOA (see Appendix I-1). VMT per year based on a conversion of VMT x 347 days per year to account for less travel on weekend, consistent with CARB statewide GHG emissions inventory methodology (CARB 2008).

When compared to existing baseline year conditions, the General Plan Update would result in an increase in VMT for gasoline-, diesel-, and electric-, powered vehicles. Although annual VMT would increase for gasoline- and diesel-powered vehicles, the fuel efficiency would increase by 6.45 mpg and 0.62 mpg, respectively. For electric-powered vehicles, annual VMT would increase by 299,977,301 miles, and annual consumption would increase by 223,958,610 kWh. The large increases in VMT and electricity usage for electric-powered vehicles are primarily based on the assumption in EMFAC that a greater mix of light-duty automobiles would be electric-powered in future years based on regulatory (e.g., Advanced Clean Cars) and consumer trends. Overall, the increase in VMT for these vehicle types would be primarily attributable to the population growth associated with the General Plan Update (see Table 2-4, *General Plan Update Buildout Summary*).

Compared to existing uses under year 2050 conditions, the General Plan Update would result in an increase in VMT and fuel usage for all fuel types (see "Net Change from Existing Year 2050" column). However, the fuel efficiency between the existing uses under 2050 conditions and the uses under the General Plan Update buildout would be the same, and implementation of the General Plan Update would not result in less efficiency in transportation fuel usage.

The improvement in fuel efficiency would be attributable to regulatory compliance (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to residents or land use development projects, but to car manufacturers. Thus, residents and employees of San Bernardino do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the City more fuel-efficient vehicle options. Furthermore, while the demand in electricity would increase under the General Plan Update, in conjunction with the regulatory (i.e., Renewables Portfolio Standard, SB 350, and SB 100) and general trend toward increasing the supply and production of energy from renewable sources, it is anticipated that a greater share of electricity used to power electric vehicles would be from renewable sources in future years (e.g., individual photovoltaic systems, purchased electricity from SCE, and/or purchased electricity from SCE that is generated from renewable sources).

In addition to regulatory compliance that would contribute to more fuel-efficient vehicles and less demand in fuels, the General Plan Update includes policies that will contribute to minimizing overall VMT, and thus fuel usage associated with the General Plan Update Area (refer to Table 3.6-6). Policies LUD-6.1, LUD-10.7, CM-2.4, CM-2.13, and CM-2.14 would encourage non-vehicular travel modes and pedestrian friendly development along major urban areas and corridors. Policies LUD-6.5, CM-3.4, and OSC-7.9 would aid in minimizing VMT through incentives for mass transit, car-pooling, and ridesharing. Although population and VMT are projected to grow, the jobs-housing ratio would increase from 1.45 to 1.5, which would

introduce more job-generating land uses than are currently available (see Chapter 3.14, *Population and Housing*, of this DEIR). Having a jobs-rich city would encourage employment opportunities for city residents and workers commuting out of San Bernardino. Therefore, this could result in shorter distances traveled between where people work and live and to amenities. Collectively, the policies listed in Table 3.6-6 would minimize overall VMT, and thus fuel usage associated with potential future development in San Bernardino.

Overall, implementation of policies in the General Plan Update, together with applicable federal, State, and local regulations, would ensure that energy demand from future growth is not inefficient, wasteful, or unnecessary. Therefore, energy impacts associated with implementation and operation of land uses accommodated under the General Plan Update would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area covers approximately 621 acres of the City's downtown, and the DTSP outlines the land use and development standards for the nine proposed Land Use Districts in the DTSP Area. Under implementation of the DTSP, the DTSP Area is projected to grow by 14,152 new residential units and 11,732,858 square feet of nonresidential space by 2050 (refer to Table 2-8, *Total Development in the Downtown Specific Plan*).

Similar to the construction of individual development projects facilitated by the General Plan Update, development within the DTSP Area would create temporary demands for electricity from equipment use and transportation. However, all operation of construction equipment would cease upon completion of project construction, and compliance with California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449, would help minimize nonessential idling of construction equipment.

The DTSP envisions a smaller buildout compared to the General Plan Update and is included in the forecast electricity, natural gas, and transportation fuel usage calculated for the General Plan Update Area. Consequently, the DTSP would not cause a greater increase in demand for electricity, natural gas, and fuel demand than what is considered under the General Plan Update. New and replacement buildings in compliance with current and future updates to the Building Energy Efficiency Standards and CALGreen would generally have greater energy efficiency than existing buildings. Additionally, improvements in fuel efficiency resulting from regulatory compliance, along with the ongoing shift toward greater renewable energy production, would help reduce transportation fuel consumption.

As a result, the development associated with the DTSP would not result in wasteful, inefficient, or unnecessary consumption of fuel use (energy resources). Impacts related to construction-related and operational energy use would be **less than significant**.

**Significance without Mitigation:** Less than significant.

**b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

### Energy Action Plan

As discussed in Section 3.6.1, *Regulatory Framework*, the Energy Action Plan was developed to create a unified State energy policy framework. It serves as one of the State's strategies for reliable, affordable, and environmentally responsible energy procurement and supply. The Energy Action Plan establishes a "loading order" to prioritize statewide energy planning efforts; it first prioritizes meeting existing demand with cost-effective energy efficiency and demand response efforts, then using renewable energy resources and distributed generation, and finally meeting the remaining energy demand with renewable or otherwise "clean" fossil-fuel power generation resources (e.g., renewable natural gas). Other priorities include modernizing transmission and distribution infrastructure, enhancing reliability in electricity and natural gas markets, and ensuring affordable access to all Californians. Therefore, the General Plan Update can be assessed for consistency with the Energy Action Plan by examining how its policies support or conflict with its strategies, such as by promoting energy resource deployment consistent with the plan's loading order.

As described in Table 3.6-8, *Renewable and Energy Efficiency: Proposed General Plan Update Policies,* the General Plan Update includes various policies supporting the continued implementation of the Energy Action Plan. Policies LUD-6.3, LUD-6.4, LUD-6.9, UI-5.3, UI-5.4, and UI-5.5 encourage energy conservation and community-wide shift to renewable energy, aligning with the Energy Action Plan's energy efficiency and clean energy supply objectives. Policy LUD-6.1 and LUD-10.7 promote mixed-use development and equitable land use patterns, which help reduce reliance on fossil fuels for transportation and lower overall energy demand in line with the Energy Action Plan's efficiency-first principle in its established loading order. Therefore, the General Plan Update is consistent with the Energy Action Plan strategies, and this impact would be **less than significant**.

### Long-Term Energy Efficiency Strategic Plan

As discussed in Section 3.6.1, *Regulatory Framework*, the Long-Term Energy Efficiency Strategic Plan serves as the State's long-term roadmap to make energy efficiency a top priority in support of California's grid harmonization and renewable energy integration efforts. Key policies include achieving a zero net energy performance for all new residential construction by 2020 and all new commercial construction by 2030. While the 2020 benchmark for new residential construction has passed, the goal continues to underpin the triennial updates to the California

Building Standards Code. The Long-Term Energy Efficiency Strategic Plan serves as a living strategic document for State and local agencies and emphasizes the integration of energy efficiency policies and measures into planning efforts as a critical component to advancing the objectives of the plan. Therefore, the General Plan Update can be assessed for consistency with the Long-Term Energy Efficiency Strategic Plan by examining how its policies generally support or conflict with the plan, such as by promoting compact in-fill development, green building standards, or zero net energy readiness.

As described in Table 3.6-8, the General Plan Update includes various policies that would support the continued implementation of the Long-Term Energy Efficiency Strategic Plan. Policies UI-5.1 and UI-5.2 directly encourages buildings that are energy efficient and support green construction and design techniques, thereby advancing the plan's objectives for integrating demand-side efficiency, distributed energy resources, and energy resiliency. Therefore, the General Plan Update is consistent with the Long-Term Energy Efficiency Strategic Plan strategies, and this impact would be **less than significant**.

**Table 3.6-8 Renewable and Energy Efficiency: Proposed General Plan Update Policies**

| **Land Use and Urban Form Element** | |
|---|---|
| LU-6.1 | **Urban form to reduce GHG emissions**. Promote residential, commercial, and industrial development within urbanizing areas that is compact, pedestrian friendly, and served by transportation options along major corridors and in key activity areas. |
| LU-6.3 | **Net-zero buildings.** Encourage new or expanded commercial and industrial projects exceeding 100,000 square feet of gross floor area, such as big-box stores, warehouses, distribution centers, and similar uses, to set a goal to achieve net zero energy and water uses. |
| LU-6.4* | **Measures to reduce GHG emissions from buildings.** Require incorporation of measures to reduce or eliminate preventable GHG emissions in new projects exceeding 100,000 square feet of gross floor area. Measures may include, but are not limited to:<br>▪ Reducing on-site energy consumption.<br>▪ Increasing on-site energy generation and storage.<br>▪ Supporting renewable energy projects in the city.<br>▪ Reducing vehicle trips and waste generation. |
| LU-6.9 | **Alternative energy generation sources.** Promote and facilitate technologies that reduce the burning of fossil fuels and their deleterious impact on the environment. Examples include, but are not limited to:<br>▪ Alternative (non-fossil fuel) fueling stations and power sources for autos and trucks.<br>▪ Alternative energy sources, including hydroelectricity, solar, and wind to the extent feasible.<br>▪ Emergent zero emission technology for trains and mass transit alternatives**.** |

**Table 3.6-8 Renewable and Energy Efficiency: Proposed General Plan Update Policies**

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-5.1 | **Public facility and infrastructure energy use**. As cost feasible, maximize energy efficiency without reducing public safety or service levels by incorporating proven energy advancements in City facilities and infrastructure:<br>▪ Street infrastructure such as lighting, signals, etc.<br>▪ Buildings and facilities, both interior and exterior.<br>▪ City fleet, public transit, and trains<br>▪ Water, sewer, and other infrastructure. |
| UI-5.2 | **Energy efficient building design**. Encourage and require, to the extent applicable, the incorporation of best practices in the design and operation of buildings. Examples include:<br>▪ Passive and active solar and wind design concepts.<br>▪ Cool roofs, green roofs, and rooftop gardens.<br>▪ Energy efficiency internal building components. |
| UI-5.3 | **Renewable energy systems in new development**. Increase the installation of on-site renewable energy systems, battery storage, and micro-grids in projects encourage buildings to install such systems. |
| UI-5.4 | **Solar energy.** Continue to support and facilitate the expansion of solar energy projects on residential units, nonresidential, and public facilities through incentives, development codes, and public education. |
| UI-5.5 | **Alternative energy generation**. Diversify the City's energy portfolio through the development of alternative energy technologies that include, but are not limited to:<br>▪ Methane recovery from landfills and fuel cells.<br>▪ Energy generation at wastewater treatment plants.<br>▪ Hydroelectricity from water infrastructure turnouts.<br>▪ Geothermal energy at City facilities where feasible. |

*Denotes mitigating policies

## DOWNTOWN SPECIFIC PLAN

As described in Chapter 2, *Project Description*, the DTSP includes various land use and development standards for each of the nine proposed Land Use Districts in the DTSP Area that would support the continued implementation of the Energy Action Plan and the Long-Term Energy Efficiency Strategic Plan. Specifically, key objectives of the DTSP include promoting sustainable, mixed-use development; reducing automobile dependency; and encouraging green building design, including sustainable technologies such as rooftop gardens, stormwater management, photovoltaic energy sources, and other renewable and conservation technologies.

Furthermore, as described in Table 3.6-8, various General Plan Update policies would also support a community-wide shift towards renewable energy and promotion of energy efficient and green construction. These policies would directly also help the growth under the DTSP to be aligned with the Energy Action Plan and Long-Term Energy Efficiency Strategic Plan strategies. Therefore, the DTSP would be consistent with the Energy Action Plan and Long-Term Energy Efficiency Strategic Plan strategies, and impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.6.4 Cumulative Impact Analysis

**Would the project have a cumulative effect related to energy?**

The area considered for cumulative impacts to electricity and natural gas supplies and facilities is SCE and SoCalGas service areas. Other future development in the SCE and SoCalGas service areas would be subject to existing state regulations, such as the California Energy Code and CALGreen Code. New buildings would use new energy-efficient appliances and equipment, pursuant to the Appliance Efficiency Regulations. These measures would reduce the overall consumption of electricity and natural gas. Moreover, the proposed project includes various policies and standards to reduce energy consumption and promote renewable energy sources. Consequently, the proposed project's potential contribution to cumulative impacts would be **less than significant**.

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# 3.7 GEOLOGY AND SOILS

This section describes the impacts related to geological and soil hazards, paleontological resources, and unique geologic features associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP) referred to together as the "proposed project". A summary of the relevant regulatory framework and existing conditions is followed by a discussion of the project-specific and cumulative impacts.

## 3.7.1 Regulatory Framework

### FEDERAL

#### Paleontological Resources Preservation Act

This legislation directs the Secretaries of the U.S. Department of the Interior and U.S. Department of Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. To formulate a consistent paleontological resources management framework, the Paleontological Resources Preservation Act (PRPA) incorporates most of the recommendations from the report of the Secretary of the Interior titled "Assessment of Fossil Management on Federal and Indian Lands" (USDI 2000). In passing the PRPA, Congress officially recognized the scientific importance of paleontological resources on some federal lands by declaring that fossils from these lands are federal property that must be preserved and protected. The PRPA codifies existing policies of the Bureau of Land Management, National Park Service, US Forest Service, Bureau of Reclamation, and US Fish and Wildlife Service, and provides the following:

- Uniform criminal and civil penalties for illegal sale and transport, and theft and vandalism of fossils from federal lands.
- Uniform minimum requirements for paleontological resource-use permit issuance (terms, conditions, and qualifications of applicants).
- Uniform definitions for "paleontological resources" and "casual collecting."
- Uniform requirements for curation of federal fossils in approved repositories.

#### National Environmental Policy Act of 1969

The National Environmental Policy Act of 1969 (NEPA), as amended, recognizes the continuing responsibility of the federal government to "preserve important historic, cultural, and natural aspects of our national heritage…" (42 US Code Sec. 4321). With the passage of the PRPA, paleontological resources are considered a significant resource and it is therefore now standard practice to include paleontological resources in NEPA studies in all instances where there is a possible impact.

## Antiquities Act of 1906

The Antiquities Act of 1906 (16 USC 431–433) states, in part:

> That any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court.

Although there is no specific mention of natural or paleontological resources in the Act itself, or in the Act's uniform rules and regulations (Title 43 Part 3, Code of Federal Regulations [43 CFR 3]), the term “objects of antiquity” has been interpreted to include fossils by the National Park Service, Bureau of Land Management, the US Forest Service, and other federal agencies. Permits to collect fossils on lands administered by federal agencies are authorized under this Act. However, due to the large gray areas left open to interpretation due to the imprecision of the wording, agencies are hesitant to interpret this act as governing paleontological resources.

## Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 was intended to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program. Pursuant to this Act, the National Earthquake Hazards Reduction Program was established, which designates the Federal Emergency Management Agency as the lead agency of the program. Programs provide valuable resources to guide building code requirements and planning efforts such as emergency evacuation responsibilities and seismic code standards.

# STATE

## Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was intended to mitigate the hazard of surface fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The Act delineates “Earthquake Fault Zones” along faults that are “sufficiently active” and “well defined.” The Act also requires that cities and counties withhold development permits for sites within an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting. Pursuant to this Act, structures for human occupancy are not allowed within 50 feet of the trace of an active fault.

## Seismic Hazards Mapping Act

Earthquakes can cause significant damage even if surface ruptures do not occur. The Seismic Hazards Mapping Act of 1990 was intended to protect the public from the hazards of nonsurface fault rupture from earthquakes, including strong ground shaking, liquefaction, seismically induced landslides, or other ground failure. The California Geological Survey prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to nonsurface fault hazards. The act requires responsible agencies to approve projects within seismic hazard zones only after a site-specific investigation to determine if the hazard is present, and the inclusion, if a hazard is found, of appropriate mitigation(s).

## Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more state-mapped hazard areas, including a Seismic Hazard Zone. California law also requires that when houses built before 1960 are sold, the seller must give the buyer a completed earthquake hazards disclosure report and a booklet titled "The Homeowners Guide to Earthquake Safety." This publication was written and adopted by the California Seismic Safety Commission.

## Soils Investigation Requirements

Requirements for soils investigations for subdivisions requiring tentative and final maps, and for other specified types of structures, are in California Health and Safety Code Sections 17953 to 17955, and in Section 1802 of the California Building Code. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness.

## California Building Code

Every public agency enforcing building regulations must adopt the provisions of the California Building Code (CBC), which is Title 24, Part 2 of the California Code of Regulations. The most recent version is the 2025 CBC, effective January 1, 2026. The CBC is updated every three years and provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC also contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground shaking with specified probability of occurring at a site. A city may adopt more restrictive codes than state law based on conditions in their community.

## California General Plan Law and General Plan Guidelines

State law (Government Code Section 65302) requires cities to adopt a comprehensive long-term general plan that includes a safety element. The safety element is intended to provide guidance for protecting the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence; liquefaction; other seismic hazards identified by Public Resources Code (PRC) Sections 2691 et. seq.; and other geologic hazards known to the legislative body. The seismic safety element must also include mapping of known seismic and geologic hazards from the California Geological Survey and a series of responsive goals, policies, and implementation programs to improve public safety.

## Public Resources Code Section 5097.5 and Section 30244

State requirements for management of paleontological resources are included in PRC Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts on paleontological resources from developments on public (e.g., State, county, city, or district) lands.

## Paleontological Assessment Standards

The Society of Vertebrate Paleontology (SVP) has established guidelines for the identification, assessment, and mitigation of adverse impacts on nonrenewable paleontological resources. Most practicing paleontologists in the United States adhere closely to the SVP's assessment, mitigation, and monitoring requirements as outlined in these guidelines, which were approved through a consensus of professional paleontologists. The SVP has helped define the value of paleontological resources and, in particular, indicates that geologic units of high paleontological potential are those from which vertebrate or significant invertebrate or plant fossils have been recovered in the past (i.e., are represented in institutional collections). Only invertebrate fossils that provide new information on existing flora or fauna or on the age of a rock unit would be considered significant. Geologic units of low paleontological potential are those that are not known to have produced a substantial body of significant paleontological material. As such, the sensitivity of an area with respect to paleontological resources hinges on its geologic setting and whether significant fossils have been discovered in the area or in similar geologic units.

# REGIONAL

## San Bernardino County Multi-jurisdictional Hazard Mitigation Plan

The 2017 San Bernardino County Multi-jurisdictional Hazard Mitigation Plan (MJHMP) is a countywide plan intended to reduce and eliminate risk associated with natural and manmade disasters. San Bernardino's MJHMP encompassed the unincorporated areas in the County

within areas overseen or managed by the Flood Control District, Fire District and Special Districts Department. The Plan includes a summary of hazards and risk assessment data as it relates to the San Bernardino Planning Areas as well as information on future development trends affecting community vulnerability.

### San Bernardino Emergency Operations Plan

The San Bernardino Emergency Operations Plan (EOP) is prepared by the San Bernardino Couty Fire Department. The EOP provides a comprehensive document containing guidance and procedures for the County in the case of an emergency. The EOP involves various agencies and organizations within the County as well as coordinate with other federal, state, county, local and private sector entities. The San Bernardino County Human Services Department/OES is a primary Care & Shelter Unit Leader, meaning its responsibilities entail providing food, clothing, and shelter to disaster victims within the County. Secondary leaders include County Administrative Office, County Fire Department, and County Public Health Department. The County of Human Services Department is within the General Plan Update Area as well as the County Public Administration Office and County Public Health Department. The plan:

- Provides the concept of operations and strategic activities for responding to any type of emergency incident impacting the County.
- Is consistent with the requirements of the Standardized Emergency Management System (SEMS) as defined in Government Code Section 8607(a) and the National Incident Management System (NIMS) as defined by Presidential Executive Orders for managing response to multi-agency and multi-jurisdictional emergencies.

## LOCAL

### City of San Bernardino Local Hazard Mitigation Plan

The City of San Bernardino's Local Hazard Mitigation Plan (LHMP) is a plan that the City reviews, monitors, and updates approximately every five years to reflect changing conditions and new information. The LHMP presents information regarding hazards within the City and mitigation measures to reduce consequences of hazards. The purpose of the LHMP is to analyze potential hazards and provide a plan to reduce and/or eliminate risk in the City by developing more resilient communities. The current version of the LHMP is dated April 7, 2024;. The LHMP addresses hazards associated with flood, wildfires, earthquakes and geologic hazards, and other lower probability hazards (San Bernardino 2024)

### City of San Bernardino Municipal Code

The following sections of the San Bernardino Municipal Code (SBMC) relate to geology and soils impacts:

- **Title 15, Buildings and Construction,** is based on the California Building Code and supplemented with local amendments. It regulates the construction, change of occupancy, alteration, repair, removal, and maintenance of any building or structure in the city as well as any grading or alteration of land.
  - **Chapter 15.08, Liquefaction**, defines development standards pertaining to liquefaction to reduce the potential risk of property damage and loss of life due to liquefaction-induced building failures during an earthquake. This chapter requires liquefaction reports and hazard mitigation measures for development in areas susceptible to liquefaction.
  - **Chapter 15.12, Earthquake Hazard Reduction in Existing Buildings**, requires that any building owner who has received notice that a building within the city is constructed of unreinforced masonry display a warning at the entrance of the building. Additionally, any unreinforced masonry building that has been continuously vacant or abandoned for a period of one year or more shall be strengthened to comply with the standards in Section 15.12.010 prior to re-occupancy.

### City of San Bernardino Development Code

Chapter 19.17 of the existing Development Code defines the City's Hillside Management Overlay Zone, which provides for low-density residential development in the city's hillside areas in a manner which protects the hillside's natural and topographic character and identity; environmental sensitivities; aesthetic qualities; and the public health, safety, and general welfare. This protection is obtained by ensuring that development does not create soil erosion, silting of lower slopes, slide damage, flooding problems, and severe cutting or scarring. The Hillside Management Overlay Zone is intended to approximate the location of hillside areas along the foothills in the northern area of the city.

### City of San Bernardino General Plan

The City's existing 2005 General Plan includes policies and actions pertaining to geologic, soil, and seismic hazards in the Public Safety Element.

## 3.7.2 Existing Conditions

The following existing conditions information describes the geologic and soils setting of both the citywide area and General Plan Update Area.

### GEOLOGIC SETTING

The City of San Bernardino lies on a broad, gently sloping lowland that flanks the southwest margin of the San Bernardino Mountains. The lowland is underlain by alluvial sediments eroded from bedrock in the adjacent mountains and washed by rivers and creeks into the valley region

where they have accumulated in layers of gravel, sand, silt, and clay. Sediment accumulation has continued for several million years, during which time increasing thicknesses of sediments have gradually buried the original hill and valley topography of the Bunker Hill-San Timoteo Basin. Shandin Hills and other smaller hills areas in the basin are remnants of the original topography.

The San Bernardino Mountains, Shandin Hills, and other hilly areas are composed predominantly of Mesozoic and older crystalline basement terrain. Younger sedimentary deposits consist of late Pleistocene alluvium outcroppings on the older alluvial fans northeast of the city and underlying the younger Holocene alluvium of the San Bernardino Valley. These younger sediments accumulated in two different environments. Alluvial fans that extend downslope from the mouths of the San Bernardino Mountain canyons consist of coarse-grained and more poorly sorted boulders, cobbles, gravels, sands, silts, and clays that decrease in size and abundance to the southwest. Floodplain deposits from the Santa Ana River, Cajon Creek, and Lytle Creek in the vicinity of the city consist predominantly of sand, sandy silt, and silt. The alluvial floodplain deposits are interlaid and form a highly variable and often laterally discontinuous layering of various sizes of alluvial materials.

## SEISMIC SETTING

### Regional Faulting

The shifting and movement of the Earth's tectonic plates are responsible for seismic events. The location at which two tectonic plates join is called a fault line. Any buildings or infrastructure situated around, on top of, or across a fault line are subject to severe seismic shaking and could potentially be severely damaged or destroyed. An active fault is defined by the State Mining and Geology Board as a fault that has had surface displacement within Holocene times (approximately within the last 11,000 years) and therefore is considered more likely to generate a future earthquake.

The City of San Bernardino lies within the Bunker Hill-San Timoteo Basin and is affected by both local and regional active faults. According to the U.S. Geological Survey and California Geological Survey, there are several regional faults within Alquist-Priolo Special Study Zones near the city that could result in seismic hazards should an earthquake occur along one of them, including the San Andreas Fault Zone and the San Jacinto Fault Zone (CGS 2021).

### Fault Rupture

Historically, ground surface displacements closely follow the trace of geologically young faults. Fault rupture can occur along pre-existing, known active fault traces; however, fault rupture also can splay from known active faults or rupture along unidentified fault traces. San Bernardino is located between several active fault zones—including the San Andreas, San Jacinto, Glen Helen, and the Loma Linda Faults. Each of these faults is classified as Alquist Priolo Special Study Zones, as shown on Figure 3.7-1, *Regional Fault Lines*. The DTSP Area is not within an Earthquake Fault

Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist in the DTSP Area (CGS 2021). The probability of fault offset at the DTSP Area from a known active fault is very low. In a seismically active area, the remote possibility exists for future faults in areas where no faults previously existed; however, the probability of surface faulting and consequent secondary ground failure from previously unknown faults is also very low.

## Seismic Shaking

Southern California is a seismically active region, with seismic hazards depending on proximity and earthquake potential of nearby active faults and the local geologic and topographic conditions, which can either amplify or attenuate seismic waves. Seismic shaking refers to the movement of the earth's surface resulting from an earthquake. This shaking is typically the primary cause of damage in earthquakes, which generally correlates to the magnitude of the earthquake and proximity to the event's epicenter. The Modified Mercalli Intensity (MMI) scale measures the physical impact of an earthquake based on the amount of observed damage. Since the degree of shaking, and consequently damage, generally decreases as the seismic energy travels farther from the point of origin, different sections of a city or region can report different MMI measurements in different locations. While the MMI scale replaced the Richter Scale, which loses its effectiveness when measuring stronger earthquakes, the Richter Scale is still used to detect the magnitude of the epicenter of an earthquake, whereas the MMI scale measures a specific location's physical effects due to an earthquake. Table 3.7-1, *Modified Mercalli Earthquake Intensity Scale*, shows the MMI intensity as well as the Richter Scale equivalent.

**Table 3.7-1 Modified Mercalli Earthquake Intensity Scale**

| MMI Intensity | Description | Effects Observed | Richter Scale Equivalent (M) |
|---|---|---|---|
| I | Instrumental | Felt only by a few people, under especially favorable conditions. No effect. | 1 to 2 |
| II | Feeble | Felt only by a few people at rest, especially on the upper floors of buildings. Noticed only by sensitive people. | 2 to 3 |
| III | Slight | Noticeable by people indoors, especially on upper floors, but not always recognized as an earthquake. Noticed only by sensitive people/ Resembles vibrations caused by heavy traffic. | 3 to 4 |
| IV | Moderate | Felt by many indoors, and by some outdoors. Sleeping people may be awakened. Dishes, windows, and doors | 4 |

**Table 3.7-1 Modified Mercalli Earthquake Intensity Scale**

| MMI Intensity | Description | Effects Observed | Richter Scale Equivalent (M) |
|---|---|---|---|
| | | are disturbed. Resembles vibrations caused by heavy traffic. | |
| V | Slightly strong | Felt by nearly everyone, and many sleeping people are awakened. Some dishes and windows broken, and unstable objects overturned. Sleepers awakened; bells ring. | 4 to 5 |
| VI | Strong | Felt by everyone. Some heavy furniture is moved, and there is slight damage. Trees sway, some damage from falling objects. | 5 to 6 |
| VII | Very strong | Negligible damage in well-built buildings, slight to moderate damage in ordinary buildings, and considerable damage in poorly built structures. General alarm, cracking of walls. | 6 |
| VIII | Destructive | Slight damage in well-built buildings, considerable damage and partial collapse in ordinary buildings, and great damage in poorly built structures. Chimneys fall and some damage to building. | 6 to 7 |
| IX | Ruinous | Considerable damage in specially designed structures. Significant damage and partial collapse in substantial buildings, and buildings are shifted off foundations. Ground cracks, houses begin to collapse, pipes break. | 7 |
| X | Disastrous | Most foundations and buildings with masonry or frames are destroyed, along with some well-built wood structures. Rail lines are bent. Ground badly cracked, many buildings destroyed. Some landslides. | 7 to 8 |
| XI | Very disastrous | Most or all masonry structures are destroyed, along with bridges. Rail lines are substantially bent. Few buildings remain standing, bridges destroyed. | 8 |
| XII | Catastrophic | Damage is total. The lines of sight are distorted, and objects are thrown into the air. Total destruction; objects thrown in air, shaking and distortion of ground. | 8 or greater |

Source: USGS 2024a.

## Liquefaction

Liquefaction is a process whereby strong ground shaking causes sediment layers that are saturated with groundwater to lose strength and behave as a fluid. This subsurface process can lead to near-surface or surface ground failure that can result in property damage and structural

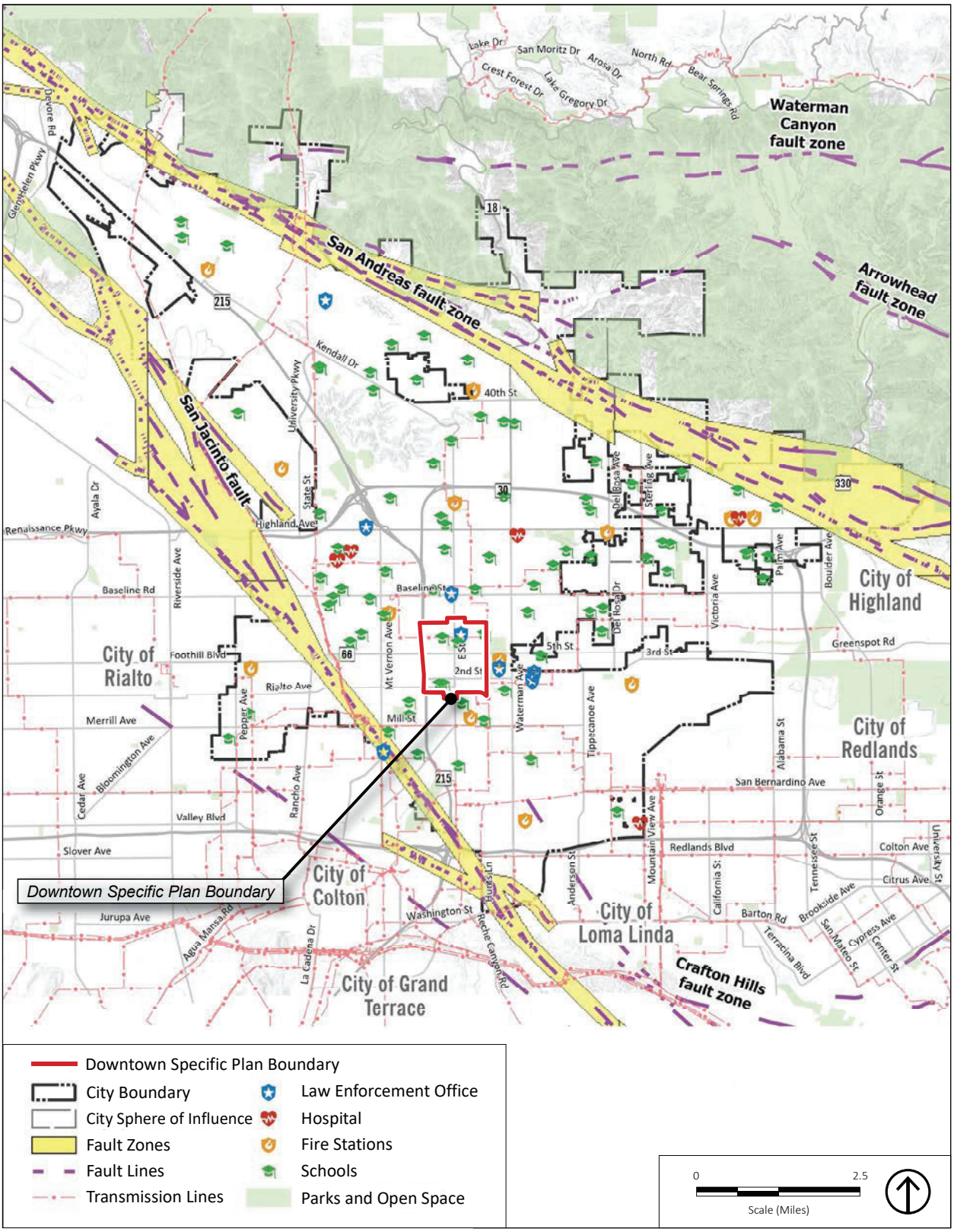
failure. If surface ground failure does occur, it is usually expressed as lateral spreading, flow failures, ground oscillation, and/or general loss of bearing strength. Sand boils (injections of fluidized sediment) can commonly accompany these different types of failure. In order to determine a region's susceptibility to liquefaction, the following three major factors must be analyzed:

- The intensity and duration of ground shaking.
- The age and textural characteristic of the alluvial sediments. Generally, the younger, less-well-compacted sediments tend to have a higher susceptibility to liquefaction. Textural characteristics also play a dominant role in determining liquefaction susceptibility. Sand and silty sands deposited in river channels and floodplains tend to be more susceptible to liquefaction, and floodplains tend to be more susceptible to liquefaction than coarser or finer grained alluvial materials.
- The depth to the groundwater. Groundwater saturation of sediments is required in order for earthquake-induced liquefaction to occur. In general, groundwater depths shallower than 10 feet to the surface can cause the highest liquefaction susceptibility.

Drought conditions have produced groundwater conditions more susceptible to liquefaction. As of the publication of the 2016 City of San Bernardino's Hazard Mitigation Plan, drought conditions have pushed the subsurface groundwater table of the Bunker Hill Basin to approximately 25 feet below ground level, a level where liquefaction becomes more likely. Areas most susceptible to liquefaction have water tables less than 10 feet below the surface.

The San Andreas and San Jacinto Fault zones impede movement of groundwater, raising the water table nearly to the surface below the course of the Santa Ana River. Geologic units that generally are susceptible to liquefaction include late Quaternary alluvial and fluvial sedimentary deposits and artificial fill. Figure 3.7-2, *Liquefication*, depicts the areas most susceptible to liquefaction in the city should a major earthquake occur along the San Andreas, San Jacinto, or Loma Linda/Glen Helen Faults. Areas of High and Moderately High Liquefaction Potential are distributed throughout the city.

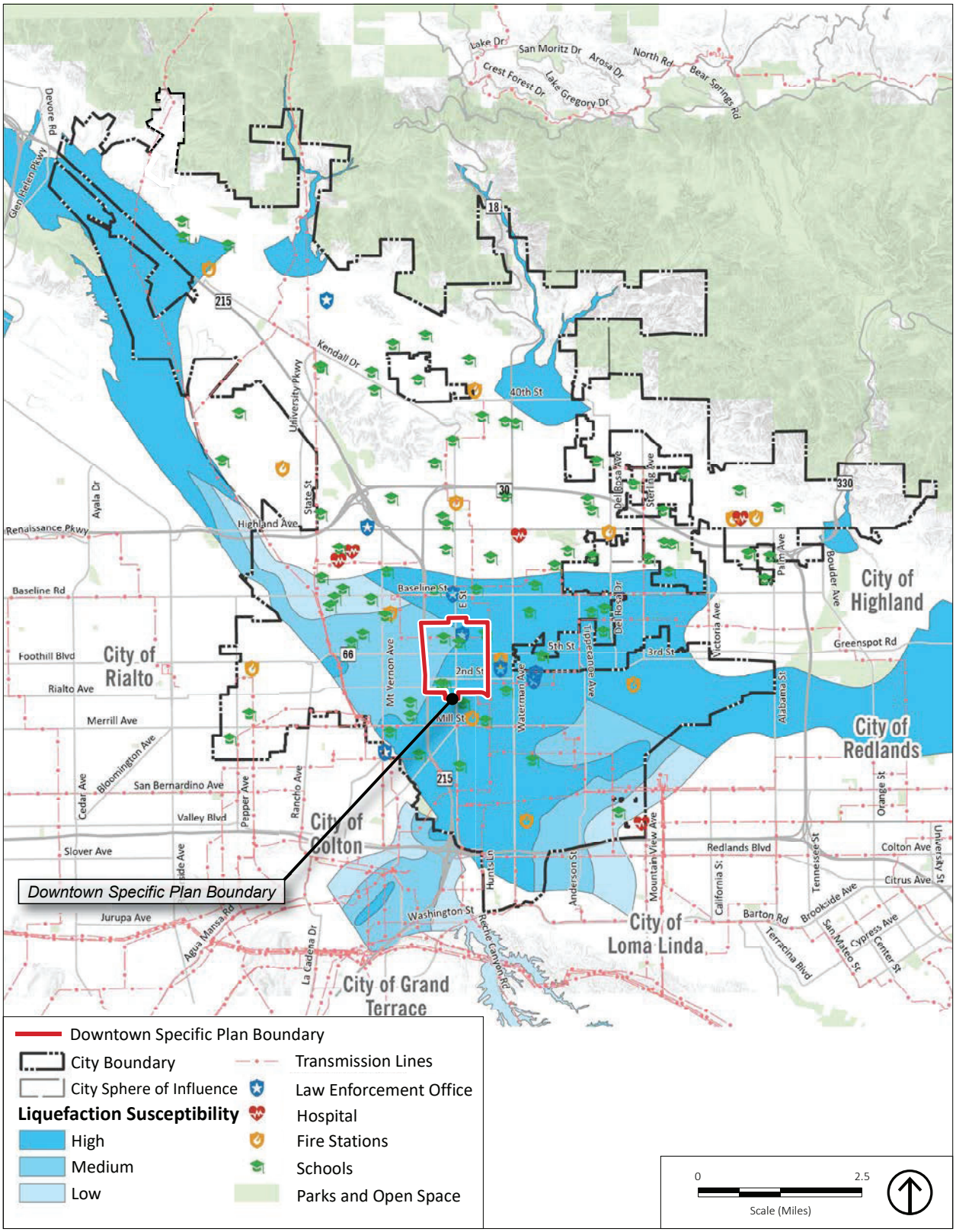
Areas of high and moderate-to-high liquefaction susceptibility are located throughout the south end of the city. High susceptibility areas are concentrated adjacent to the San Andreas Fault Zone north and northeast of the city and in the old artesian area between the San Andreas and San Jacinto Faults in the central and southern part of the city. As shown in Figure 3.7-2, the DTSP Area is in an area of medium-to-high liquefication susceptibility.




Source: Generated using GIS Pro 2022; USGS.

Figure 3.7-1
**Regional Fault Lines**

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Source: Generated using GIS Pro 2022; County of San Bernardino 2016.

Figure 3.7-2
**Liquefaction**

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## GEOLOGIC HAZARDS

### Subsidence

Subsidence can be caused by natural geologic processes or by human activity such as subsurface mining or pumping of groundwater or oil. San Bernardino's location on the thick, poorly consolidated alluvial marsh deposits of the old artesian area north of Loma Linda has created areas of the city that are especially susceptible to subsidence. Potential subsidence in this area may be as great as five to eight feet if unreplenished groundwater is depleted from the Bunker Hill-San Timoteo Basin. As shown in Figure 3.7-3, *Areas of High Subsidence*, areas of high subsidence potential underlie much of the city, including the DTSP Area.

### Landslides

The city is vulnerable to landslides due to its proximity to mountainous terrain and susceptibility to wildfire risk and heavy precipitation events. Wildfires remove vegetation that helps keep soils stable. Rain on newly burned areas can erode the soils and result in landslides.

Slope stability is determined by a number of factors, including slope, vegetation cover, wildfire, bedrock, soil, precipitation, and human alteration. Slope stability can change over time as any of these conditions change. Slopes are subdivided into areas of low, moderate, and high relief. The city's susceptibility to landslides is considered low to moderate. However, two potentially hazardous zones exist:

- Areas of low relief with low to moderate landslide susceptibility that may contain small-scale surficial soil slips, debris flow, and mudflows on steep slopes.
- Areas of moderate and high relief with low to moderate susceptibility that may contain small to large rotational slide, debris slides, and combinations of surficial slides and flows.

Potential slope failure in these areas could be hazardous to buildings, reservoirs, roads, and utilities. Seismic shaking may also induce slope failure. As shown in Figure 3.7-4, *Landslides*, landslide-susceptible slopes are located primarily in the northern area of the city. The DTSP Area is within an area of low landslide susceptibility.

### Erosion

Several soils in the city are highly susceptible to both wind and water erosion, especially those in alluvial fans. Soil erosion has historically coincided with major storms, high winds, floods, and fires. In San Bernardino County, much of the damage to landfill and disposal sites during the December 2010 winter storm was caused by erosion, with sediment carried from undeveloped areas to where no improved drainage system was in place. Major soil erosion events also occurred in 1954 and 1993, coinciding with large floods and fires. With climate change, the

combination of increasing wildfire likelihood, decrease in soil moisture due to extreme heat and drought, and persistent severe winds may increase the rate of soil erosion.

### PALEONTOLOGICAL SETTING

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the earth and its past ecological settings. There are two types of resources; vertebrate and invertebrate paleontological resources. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Paleontological sites are areas that show evidence of pre-human activity. Often they are simply small outcroppings visible on the surface or sites encountered during grading. While the sites are important indications, it is the geologic formations that are the most important since they may contain important fossils. Potentially sensitive areas for the presence of paleontological resources are based on the underlying geologic formation. Fossil remains may occur throughout the City of San Bernardino, although the evenness of their distribution is not known. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area.

## 3.7.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form,** includes questions concerning geological and soil resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the project would have a significant effect concerning geological resources if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

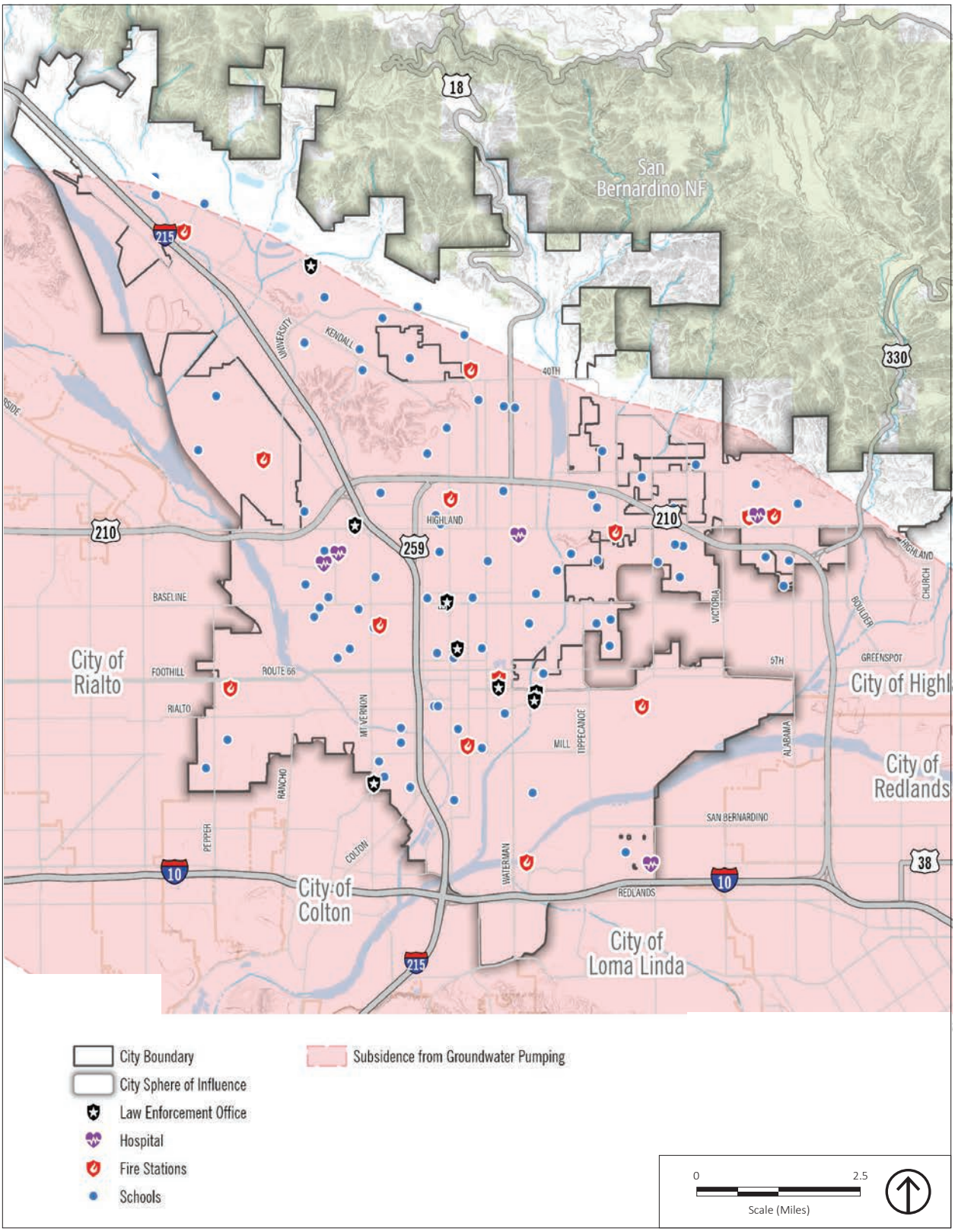
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)

ii) Strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction.

iv) Landslides.

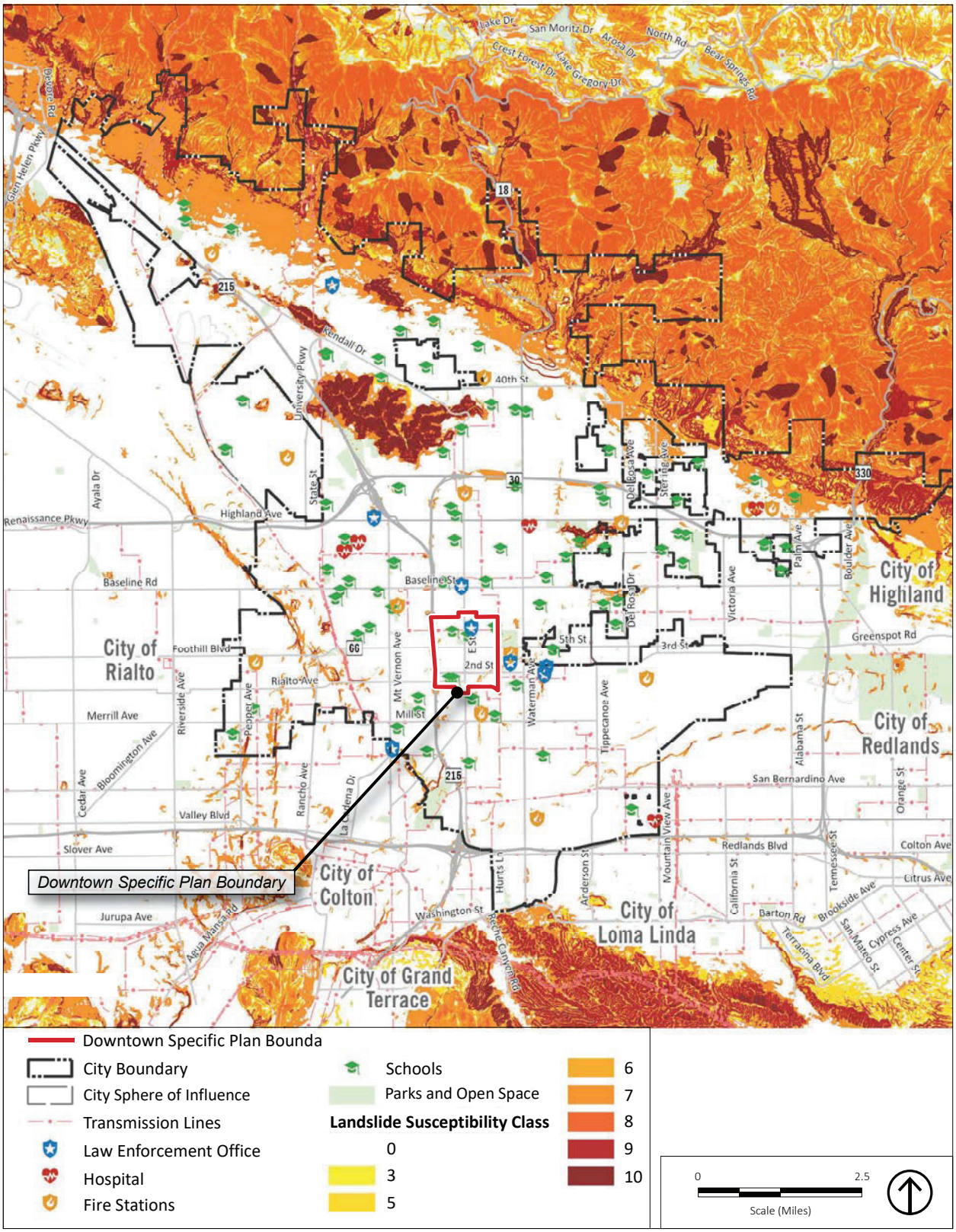
b) Result in substantial soil erosion or the loss of topsoil.




Source: PlaceWorks, City of San Bernardino 2026.

Figure 3.7-3
**Areas of High Subsidence**

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Source: Generated using GIS Pro 2022; CGS 2021.

Transmission Lines
Transmission Lines

Figure 3.7-4
**Landslides**

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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 18-1B 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.

### METHODOLOGY

The USGS Fault, Landslide, and Subsidence database maps and the CGS Earthquake Zones of Required Investigation database were searched to examine geologically significant areas in the city, that is, areas of liquefaction, soil erosion, expansive soils, settlement, and collapse.

The following analysis evaluates potential impacts of the proposed General Plan Update and DTSP with regard to geology and soils, taking into account State-mandated construction methods, as specified in California Safety and Health Administration regulations (Title 8 of the CCR) and the CBC (24 CCR, Part 2).

## 3.7.4 Project Impact Analysis

**a) Would the project subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, 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.**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As discussed in Section 3.7.2, *Existing Conditions*, the City of San Bernardino is crisscrossed by numerous faults and trace faults, many of which are within Alquist-Priolo Earthquake Fault Zones.

Construction of new structures and improvements to certain existing structures are subject to the standards and requirements in the most current version of the CBC and the City's Building Code (which is derived from the CBC). New future development in the General Plan Update Area would be constructed in accordance with applicable State and County laws (e.g., Alquist-Priolo Earthquake Fault Zoning Act, CBC, and the County Building Code), which would require project-specific geotechnical review prior to issuance of grading permits. This review would identify and address potential project-specific geotechnical hazards, including fault rupture. Compliance with requirements of the CBC for structural safety would reduce fault hazards to less than significant.

Table 3.7-2, *Geologic Hazards: Proposed General Plan Update Policies,* shows the policies and actions that would minimize impacts related to geologic hazards. These policies address seismic safety, development requirements, and site-specific geotechnical report requirements.

**Table 3.7-2 Geologic Hazards: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-4.1 | **Geologic Investigations.** Require geologic and geotechnical studies for new development as part of the project and environmental review process; require mitigations identified through those investigations. |
| S-4.2 | **Seismic Standards**. Enforce requirements of the California Seismic Hazards Mapping Act, Alquist-Priolo Acts, and California Building Code seismic standards when siting, evaluating, and constructing new projects. |
| S-4.3 | **Liquefaction Hazards.** Require liquefaction assessment for qualifying projects, in areas shown in Figure S-7, Liquefaction Areas, as being susceptible to liquefaction. Provide specific measures to mitigate liquefaction risk. |
| S-4.4 | **Critical Facility Retrofits.** Retrofit critical facilities and lifeline utilities to prevent damage from geologic and seismic hazards and ensure these facilities are functional during and after a disaster. |
| S-4.5 | **Seismically Vulnerable Buildings.** Require existing unreinforced masonry buildings to be seismically retrofitted, based on an engineering evaluation, if deemed unsafe by a building official. |
| S-4.6 | **Landslide Hazards.** Require that new construction and significant alterations to structures in landslide hazard areas identified in Figure S-9, be evaluated for site stability and provide specific mitigation prior to approval. |

**Table 3.7-2 Geologic Hazards: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-4.7 | **Hillside Hazards.** Require slope stability analyses for new development in hillsides or in landslide risk areas shown in Figure S-9, and in compliance with regulations in the City Hillside Management Overlay Zone. |
| S-4.8 | **Subsidence Risk.** Coordinate with San Bernardino County Public Works Department and the San Bernardino Municipal Water District to participate in regional measures that reduce risk of subsidence. |

Note: References to figures refer to figures in the proposed Safety Element.

Section 19-04-08.030, Environmental Resources/Constraints, of the Development Code Update states that site-specific geologic reports are required for development within Alquist-Priolo Earthquake Fault Zones to determine their precise location and any required setbacks from active faults. Human occupancy structures are prohibited within 50 feet of an active fault.

Liquefaction hazards within the City are primarily concentrated in the southern portion, as shown in Figure 3.7-2, where zones of high and moderate potential are mapped. Areas of highest susceptibility occur adjacent to the San Andreas Fault Zone to the north and northeast, as well as within the historic artesian groundwater area located between the San Andreas and San Jacinto Faults in the central and southern portions of the City. Due to these underlying geologic and groundwater conditions, the City will continue to be susceptible to liquefaction during strong seismic events. Similarly, portions of the City may be subject to landslide hazards where steep slopes and geologic conditions are present, particularly in areas influenced by fault activity and erosion. Consistent with applicable General Plan policies related to geologic hazards, public safety, and land use, future development would be required to incorporate site-specific geotechnical investigations and implement appropriate design and construction measures to reduce risks associated with liquefaction and slope instability, thereby minimizing potential impacts to people and structures.

With compliance with existing regulations, including compliance with the State and County building codes, future development under the General Plan Update would not cause or exacerbate the potential for fault rupture to occur. Therefore, the General Plan Update would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, liquefication, or landslides. As a result, impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

### Fault Rupture

No active faults or Alquist-Priolo Earthquake Fault Zones are mapped in the DTSP Area. The nearest mapped active fault to the General Plan Update Area is the San Jacinto Fault within the San Jacinto Fault Zone, about 1.06 miles southwest of the Plan boundary; the nearest Alquist-Priolo Earthquake Fault Zone is along the San Jacinto Fault zone, approximately 0.88 mile southwest of the General Plan Update Area (CGS 2021). Other faults in proximity to the city and General Plan Update Area include the San Andreas South Branch in the San Andreas Fault Zone, approximately 3.83 miles northeast of the Plan boundary, and the Loma Linda Fault in the San Jacinto Fault Zone, approximately 2 miles northwest of the Plan boundary (CGS 2021). Buildout under the DTSP would not subject people or structures to substantial hazards from surface rupture of a known active earthquake fault, and **no impact** would occur.

### Seismic Shaking

The DTSP is in a seismically active region along with other areas of Southern California. Mild to strong ground shaking can be expected to occur within the design lifetimes of structures that would be built within the DTSP Area. The intensity of ground shaking in the General Plan Update Area would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and DTSP Area.

Downtown San Bernardino also contains the highest concentration of unreinforced masonry (URM) buildings in the city, which are typically the structures most at risk of collapse in the event of strong ground shaking. In its 2016 Local Hazard Mitigation Plan update, the City estimated that 104 of these structures still exist within the city, including a number of large public buildings in the Downtown (San Bernardino 2016). The DTSP anticipates that substantial redevelopment will occur across most districts of the General Plan Update Area, which could result in the replacement of URM buildings with new development that meets current building codes and includes more stringent seismic design standards.

Structures built within the City must adhere to the CBC, which was adopted by reference in the SBMC (Chapter 15.04). Compliance with the CBC would ensure earthquake safety based on factors including occupancy type, types of soils and rock onsite, and the probable strength of ground motion. Applicable projects within the General Plan Update Area would be checked during the development review and building plan check process ensuring compliance with these requirements to enhance structural safety and reduce hazards from strong seismic shaking. Furthermore, certain categories and sizes of projects developed or redeveloped within the General Plan Update Area would also be required to conduct a geotechnical investigation at their respective sites. The geotechnical investigations would determine seismic design parameters for the site and the proposed building type per CBC requirements.

Compliance with the provisions of the CBC and the required implementation of recommended design improvements outlined in the geotechnical reports would reduce hazards from strong seismic shaking. Therefore, impacts resulting from strong ground shaking would be **less than significant**.

### Ground Failure

Figure 3.7-2 maps the majority of the DTSP Area in a high susceptibility area for liquefaction and the rest of the area in an area with moderate to moderately high susceptibility to liquefaction. Chapter 15.08 of the SBMC outlines the types of development that are required to study liquefaction potential and provide mitigation through a geotechnical study. These geotechnical investigations for applicable projects developed in the DTSP Area would assess the liquefaction potential and make site-specific recommendations to minimize potential liquefaction hazards.

Lateral spreading is a geologic hazard, in association with liquefaction, and involves the movement of surface sediment. Project-specific geotechnical investigations would assess the potential for lateral spreading where necessary and provide recommendations for minimizing hazards from such ground failure. Compliance with the recommendations and mitigation measures of geotechnical reports is required by the City. Therefore, impacts from liquefaction and lateral spreading would be **less than significant**.

### Landslides

As shown in Figure 3.7-4, areas of landslide susceptibility are concentrated primarily in the northern portion of the City, where steeper slopes and geologic conditions increase the potential for slope instability. The DTSP Area, however, is located within a zone of low landslide susceptibility and is generally characterized by relatively flat, developed urban terrain. As a result, the potential for landslide-related hazards within the DTSP Area is minimal. Consistent with applicable General Plan Update policies related to geologic hazards and public safety, future development within the DTSP Area would continue to be subject to standard engineering practices, including site-specific geotechnical review where appropriate, to ensure that any localized slope or soil stability concerns are identified and addressed, thereby maintaining a low risk of landslide impacts. Therefore, impacts from landslides would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## b) Would the project result in substantial soil erosion or the loss of topsoil?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Soils in the San Bernardino area are formed primarily from alluvial sediments that are generally poorly consolidated and susceptible to erosion. Grading often increases the potential for erosion by removing protective vegetation and land cover, changing drainage patterns and

constructing slopes. The City requires grading plans to be prepared for all new development to ensure that no significant impact would occur on a project level. Project sites larger than one acre would also be subject to National Pollution Discharge Elimination System (NPDES) requirements, including a Stormwater Pollution Prevention Plan (SWPPP) and the use of Best Management Practices (BMPs) designed to prevent erosion and siltation during construction, as explained in detail in Section 5.10, *Hydrology and Water Quality*. Individual project applicants would also be required to adhere to the applicable provisions outlined in Article 5 Section 8.80.501, Storm Water Quality Management Plan, of the SBMC. Adherence to NPDES requirements, the SWPPP and related BMPs, and the City's stormwater and urban runoff pollution regulations would ensure that this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As discussed above, the City requires grading plans to be prepared for all new development to ensure that no significant impact would occur on a project level. Project sites larger than one acre would also be subject to NPDES requirements, including a SWPPP and the use of BMPs designed to prevent erosion and siltation during construction. Individual project applicants would also be required to adhere to the applicable provisions in Article 5 Section 8.80.501, Storm Water Quality Management Plan, of the SBMC. Adherence to NPDES requirements, the SWPPP and related BMPs, and the City's stormwater and urban runoff pollution regulations would ensure that this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The city is vulnerable to landslides due to its proximity to mountainous terrain and susceptibility to wildfire risk and heavy precipitation events. Additionally, the city is susceptible to potential ground subsidence, shown in Figure 3.7-3. However, the San Bernardino Valley Water Conservation District (SBVWD) reports that current groundwater levels in the Bunker Hill Subbasin do not indicate any significant land subsidence (SBWCD 2022). The General Plan also notes that no ground subsidence has been identified since SBVWD began its groundwater recharge program in 1972. Applicable development in the city will be subject to CBC and City regulations designed to minimize these hazards. Conformance with standard engineering practices and recommendations made under geotechnical investigations would reduce the effects of unstable soils to a less than significant level.

## DOWNTOWN SPECIFIC PLAN

As described under Threshold (a), the DTSP is in an area identified to have moderate to high susceptibility to liquefaction and lateral spreading. Like other future development in the city, development in the DTSP Area would be subject to CBC and City regulations designed to minimize hazards associated with liquefication and lateral spreading. Projects would be evaluated on a project-by-project basis and conformance with recommendations made under geotechnical investigation would reduce the effects of unstable soils to **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Soil composition in the General Plan Update Area is nearly 78 percent Grangeville fine sandy loam, approximately 17 percent Hanford coarse sandy loam, and 5 percent Tujunga gravelly loamy sand (NRCS 2019). All three of these soils have low runoff rates and low shrink-swell potential or expansion characteristics, and as a result are not likely affect structures and foundations. Development within the city would be required to comply with CBC standards and perform site-specific investigations if necessary. This would reduce the potential for substantial risks to life or property as a result of the soil types in the General Plan Update Area. Therefore, impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Soils in the DTSP Area would have a low runoff rate and low shrink-swell potential that would not likely affect structures and foundations. Like the General Plan Update Area, development in the DTSP Area would be required to comply with CBC standards and perform site-specific investigations if necessary. This would reduce the potential for substantial risks to life or property as a result of the soil types in the DTSP Area. Therefore, impacts would be **less than significan**t occur.

**Significance without Mitigation:** Less than significant.

**e) Would the project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Development in the General Plan Update Area would primarily consist of infill and redevelopment on underutilized or vacant parcels. New and existing sewer mains would convey wastewater from future developments to existing wastewater treatment facilities. Implementation of the General Plan and Development Code Update would not involve installation of septic tanks, and **no impact** would occur.

**Significance without Mitigation:** No impact.

## DOWNTOWN SPECIFIC PLAN

Similarly, development in the DTSP Area would primarily consist of infill and redevelopment on underutilized or vacant parcels. New and existing sewer mains would convey wastewater from future developments to existing wastewater treatment facilities. DTSP implementation would not involve installation of septic tanks, and **no impact** would occur.

**Significance without Mitigation:** No impact.

**f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Paleontological resources are recognized as nonrenewable resources and therefore receive protection under the California Public Resources Code and CEQA. Adoption of the General Plan and Development Code Update in itself would not directly affect any paleontological resources. However, over the long term, the General Plan Update could allow development and redevelopment, including grading, of sensitive areas. Therefore, future development accommodated by the General Plan Update could potentially unearth previously unrecorded resources. Review and protection are afforded by CEQA for projects subject to discretionary action, particularly for paleontological and unique geologic resources. Nevertheless, impacts from the buildout of the General Plan Update are **potentially significant**. Therefore, mitigation is recommended to ensure significant impacts to unidentified paleontological and unique geologic resources are avoided.

**Significance without Mitigation:** Potentially significant.

**Impact GEO-1a: Implementation of the General Plan Update could impact paleontological resources.**

> **Mitigation Measure GEO-1:** Prior to issuance of a grading permit for discretionary projects that involve ground disturbance in previously undisturbed areas, the project applicant shall retain a Certified Paleontologist to assess the potential for paleontological resources and the potential for project construction to affect such resources if present. The evaluation shall be based on established professional standards, including review of geologic mapping and known fossil localities. If it is determined, to the satisfaction of the City, that there is low potential for discovery or disturbance of paleontological resources, no further action shall be required.
>
> If potential for discovery is deemed moderate to high, the project applicant shall retain a Certified Paleontologist to monitor all initial ground-disturbing activities in native soils or sediments. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required, and the paleontologist shall submit a memo to the City confirming findings of low potential.
>
> **Mitigation Measure GEO-2:** Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 50-foot radius of the discovery site shall be halted or diverted to other areas on the site, and the City shall be immediately notified. A Certified Paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.
>
> Further ground disturbance shall not resume within a 50-foot radius of the discovery site until an agreement has been reached between the project applicant, a Certified Paleontologist, and the City as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.
>
> Salvage and collection of significant fossils shall be in accordance with the Society of Vertebrate Paleontology guidelines. Any paleontological resources salvaged shall be provided for curation at a local curation facility or any other local museum or repository, such as the Western Science Center or World Museum of Natural History, willing and able to accept and house the resource to preserve for future scientific study.

**Significance with Mitigation:** Less than significant. Mitigation Measure GEO-1 would require all discretionary projects to obtain a grading permit prior to assess paleontological sensitivity at project sites before grading. GEO-2 would require any project that encounters any paleontological resource, regardless of depth, to coordinate with a qualified paleontologist and any applicable experts to collect the resources. Adherence to these mitigation measures would reduce impacts of the General Plan Update to **less than significant**.

### DOWNTOWN SPECIFIC PLAN

Adoption of DTSP in itself would not directly affect any paleontological resources. However, long-term implementation of the DTSP could allow development and redevelopment, including grading, of sensitive areas. Therefore, future development accommodated by the DTSP could potentially unearth previously unrecorded resources. Review and protection are afforded by CEQA for projects subject to discretionary action, particularly for paleontological and unique geologic resources. Nevertheless, impacts from the buildout of the DTSP would be potentially significant. Therefore, mitigation is recommended to ensure significant impacts to unidentified paleontological and unique geologic resources are avoided.

**Significance without Mitigation:** Potentially significant.

**Impact GEO-1b: Implementation of the Downtown Specific Plan could impact paleontological resources.**

**Mitigation Measures**: Implement Mitigation Measures GEO-1 and GEO-2.

**Significance with Mitigation:** Less than significant. Mitigation Measure GEO-1 and GEO-2 would require project to assess paleontological sensitivity and follow specific procedure to preserve the integrity of paleontological resources if discovered. Adherence to these mitigation measures would reduce impacts of the DTSP to **less than significant**.

## 3.7.5 Cumulative Impact Analysis

The cumulative setting for geological and soil impacts includes the City of San Bernardino and surrounding areas where future development may occur under the General Plan/Development Code Update, the DTSP, and other related or foreseeable development projects in the region.

The geographic context for the analysis of impacts resulting from geologic hazards generally is site specific rather than cumulative because each project site has a different set of geologic considerations that would be subject to uniform site development and construction standards as well as unique standards depending on the outcome of a project-specific geotechnical study.

**Would the project have a cumulative effect related to geological resources?**

Future development and redevelopment pursuant to the proposed project and other development projects in the surrounding area would involve grading and excavation activities on individual sites, which would result in changes to the area's existing topography. Compliance with the CBC and the recommendations of individual geotechnical investigations would reduce geologic hazards to new development.

## SEISMIC HAZARDS

The City of San Bernardino is crisscrossed by numerous faults and trace faults, many of which are in the Alquist-Priolo Earthquake Fault Zones. However, no faults run through the DTSP Area. Policies implemented by the proposed General Plan and Development Code Update would provide beneficial provisions and requirements relating to faults, fault hazards, and seismic-related hazards.

Ground shaking hazards due to regional earthquake events could lead to the damage of buildings, parking lots, and utility lines and subsequent fires, falling objects, and other structural hazards that could cause property damage and personal injuries. These ground-shaking hazards are not unlike the potential hazards in other areas of the region. Depending on the magnitude of the earthquake, distance to the development site, underlying soil conditions, and strength of structures and infrastructure, ground-shaking hazards may be significant. Future development and redevelopment in the city would be designed and built in accordance with applicable standards in the CBC, including pertinent seismic design criteria. Existing buildings to be reused would be rehabilitated in accordance with the CBC and local building regulations. This would allow structures to withstand ground shaking and to maintain hazards at acceptable levels.

Site-specific geologic hazards would be addressed by the geotechnical investigation required by the City for each development proposal. This investigation would identify the geologic and seismic characteristics on a site and provide guidelines for engineering design and construction to ensure the structural integrity of proposed development. Compliance of individual projects with the recommendations of the geotechnical investigation would prevent hazards associated with fault rupture, landslide potential, lateral spreading, and liquefaction. Therefore, cumulative impacts related to seismic hazards would be **less than significant**.

## EROSION

In the absence of proper erosion control features during construction, erosion-related impacts associated with other closely related past, present, and reasonably foreseeable probable future projects could potentially combine to create cumulative significant impacts. Soil erosion can lead to downstream water quality impacts, which if combined could be cumulatively considerable. However, for cumulative projects disturbing more than one acre of ground surface, the Construction General Permit requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs. Cumulative project sites that disturb less than one acre of ground surface would be required to implement, at a minimum, BMPs designed to prevent erosion and siltation during construction, which includes erosion control and sediment control strategies for small construction sites. Therefore, cumulative impacts related to soil erosion and loss of topsoil would be **less than significant**.

## UNSTABLE SOILS

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, including unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, cumulative impacts related to unstable soils would be **less than significant**.

## EXPANSIVE SOILS

Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards. The majority of impacts from geologic hazards, including expansive soils, are site-specific and are therefore generally mitigated on a project-by-project basis and do not combine with other projects resulting in a cumulative impact. Therefore, cumulative impacts related to expansive soil would be **less than significant**.

## ALTERNATIVE WATER SYSTEMS

Similar to the proposed project, other closely related past, present, and reasonably foreseeable probable future projects include connections to the sanitary sewer system and would not use on-site or alternative wastewater treatment systems. Any installation of alternative water systems would be subject to the applicable State and County requirements prior to construction. Therefore, cumulative impacts related to septic and alternative sanitary sewer or wastewater systems would be **less than significant**.

## PALEONTOLOGICAL RESOURCES

Past, present, and reasonably foreseeable future projects have affected and can be expected to continue to affect the significance of unique paleontological resources or sites or unique geologic features in the unincorporated areas, including as a result of disturbance to unanticipated discoveries of such resources during ground-disturbing activities at fossil-bearing depths. Long-term implementation of the proposed project could allow development, including grading, on portions of the city with sensitivity to paleontological resources, resulting in **potentially significant** and potentially **cumulatively considerable** impacts to paleontological resources.

**Impact GEO-2: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative impacts to paleontological resources.**

**Mitigation Measures:** Implement Mitigation Measures GEO-1 and GEO-2.

**Significance with Mitigation**: **Less than significant.**

If a paleontological resource is discovered or expected prior to or during grading or excavation, implementation of Mitigation Measure GEO-2 would apply and would reduce impacts to less than significant. Therefore, impacts would be **less than cumulatively considerable** with mitigation incorporated**.**

## 3.7.6 References

CGS (California Geologic Survey). 2021. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/EQZApp/app/.

NRCS (National Resource Conservation Service). 2019. Web Soil Survey. https://websoilsurvey.nrcs.usda.gov/app/.

San Bernardino, City of. 2024. Local Hazard Mitigation Plan Update. https://www.sanbernardino.gov/460/Local-Hazard-Mitigation-Plan.

SBVWCD (San Bernardino Valley Water Conservation District). 2022. Draft Engineering Investigation of the Bunker Hill Basin 2020–2021. https://www.sbvwcd.org/reports-and-data/engineering-investigation/6877-2022-draft-engineering-investigation-report/file.

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# 3.8 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project" to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis. GHG emissions modeling for the General Plan Update is included in Appendix C of this DEIR. Transportation-sector impacts are based on trip generation and vehicle miles traveled (VMT), as provided by KOA (see Appendices I-1 through I-3).

## Terminology

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide ($CO_2$) over a given period of time (20, 100, and 500 years). $CO_2$ has a GWP of 1.
- **Carbon dioxide-equivalent ($CO_2e$).** The standard unit to measure the amount of greenhouse gases in terms of the amount of $CO_2$ that would cause the same amount of warming. $CO_2e$ is based on the GWP ratios between the various GHGs relative to $CO_2$.
- **$MTCO_2e$.** Metric ton of $CO_2e$.
- **$MMTCO_2e$.** Million metric tons of $CO_2e$.

## Greenhouse Gases and Climate Change

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide ($CO_2$), methane ($CH_4$), and ozone ($O_3$)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to

a lesser extent are nitrous oxide ($N_2O$), sulfur hexafluoride ($SF_6$), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).[1,2]

The major GHGs applicable to the proposed project are briefly described.

- **Carbon dioxide ($CO_2$)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane ($CH_4$)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide ($N_2O$)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 3.8-1, *GHG Emissions and Their Relative Global Warming Potential*. The GWP is used to convert GHGs to $CO_2$-equivalence ($CO_2e$) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fifth Assessment Report (AR5), GWP values for $CH_4$, 10 MT of $CH_4$ would be equivalent to 280 MT of $CO_2$.

[1] Water vapor ($H_2O$) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals); however, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

[2] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB 2022). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

**Table 3.8-1 GHG Emissions and Their Relative Global Warming Potential**

| GHGs | Fourth Assessment Report (AR4) GWP Relative to $CO_2$ [1] | Fifth Assessment Report (AR5) GWP Relative to $CO_2$ [1] | Sixth Assessment Report (AR6) GWP Relative to $CO_2$ [1] |
|---|---|---|---|
| Carbon Dioxide ($CO_2$) | 1 | 1 | 1 |
| Methane[2] ($CH_4$) | 25 | 28 | 30 |
| Nitrous Oxide ($N_2O$) | 298 | 265 | 273 |

Source: IPCC 2007, 2013, and 2023.

Note: GWP = global warming potential. The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect latest information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO2. However, GWP values identified in AR5 are used by the 2022 Scoping Plan for long-term emissions forecasting.

1 Based on 100 year time horizon of the GWP of the air pollutant compared to CO2.

2 The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO2 is not included.

## HUMAN INFLUENCE ON CLIMATE CHANGE

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities.

The recent IPCC Sixth Assessment Report (AR6) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of $CO_2$ have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5°C warming (CARB 2022). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, and other conditions. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in

emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

## Potential Climate Change Impacts for California

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near-term, even for the very low GHG emissions scenario (IPCC 2023). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most areas of California is already 1°F (~0.56°C) higher than historical levels, and some areas have seen average increases in excess of 2°F (~1.1°C) (CalOES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario, in which no new actions are taken to curb GHG emissions:

- Annual average daily high temperatures in California are expected to rise by 2.7°F by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.

- Droughts are likely to become more frequent and persistent through 2100.[3]
- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.
- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) would occur 50 percent more frequently. The maximum area burned statewide may increase 178 percent by the end of the century.
- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs. (CalOES 2020)

Global climate change risks to California are shown in Table 3.8-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

[3] Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015 (OEHHA 2018). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015 (OEHHA 2018).

### Table 3.8-2 Summary of GHG Emissions Risks to California

| Impact Category | Potential Risk |
|---|---|
| Public Health Impacts | ▪ Heat waves will be more frequent, hotter, and longer<br>▪ Fewer extremely cold nights<br>▪ Poor air quality made worse<br>▪ Higher temperatures increase ground-level ozone levels |
| Water Resources Impacts | ▪ Decreasing Sierra Nevada snow pack<br>▪ Challenges in securing adequate water supply<br>▪ Potential reduction in hydropower<br>▪ Loss of winter recreation |
| Agricultural Impacts | ▪ Increasing temperature<br>▪ Increasing threats from pests and pathogens<br>▪ Expanded ranges of agricultural weeds<br>▪ Declining productivity<br>▪ Irregular blooms and harvests |
| Coastal Sea Level Impacts | ▪ Accelerated sea level rise<br>▪ Increasing coastal floods<br>▪ Shrinking beaches<br>▪ Worsened impacts on infrastructure |
| Forest and Biological Resource Impacts | ▪ Increased risk and severity of wildfires<br>▪ Lengthening of the wildfire season<br>▪ Movement of forest areas<br>▪ Conversion of forest to grassland<br>▪ Declining forest productivity<br>▪ Increasing threats from pest and pathogens<br>▪ Shifting vegetation and species distribution<br>▪ Altered timing of migration and mating habits<br>▪ Loss of sensitive or slow-moving species |
| Energy Demand Impacts | ▪ Potential reduction in hydropower<br>▪ Increased energy demand |

Source: CEC 2006, 2009; CCCC 2012; CNRA 2014; CalOES 2020.

## 3.8.1 Regulatory Framework

This section describes the federal, state, and local regulations applicable to GHG emissions.

### FEDERAL

### United States Environmental Protection Agency

The US Environmental Protection Agency (EPA) adopted the 2009 Greenhouse Gas Endangerment Finding stating that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. On February 12, 2026, in response to the Trump Administration's Executive Order (EO), "Unleashing American Energy," EPA rescinded the 2009 Greenhouse Gas Endangerment Finding. Therefore, GHG emissions are no longer regulated at the Federal level.

### Federal Fuel Economy and Fuel Standards

#### *Update to Corporate Average Fuel Economy Standards*

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the USEPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. On June 7, 2024, NHTSA announced final CAFE standards for passenger cars and light trucks built in model years 2027-2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030-2035. The final rules establish standards that would require an industry fleet-wide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031, by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027-2031) and for light trucks (model years 2029-2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030-2032) and 8 percent per year (model years 2033-2035) (NHTSA 2024).

#### *Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles*

In 2024, the USEPA issued a final rule, "Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with MY 2027 (USEPA 2025).

### *2025 Rollback of CAFE and Federal Fuel Standards*

While both the new CAFE standards and fuel standard are currently in effect, the Trump Administration, directed the Department of Transportation to rescind and replace all existing CAFE standards and emissions standards on January 29, 2025. This action targeted regulations covering MY 2024 through 2035 for both light-duty and heavy-duty vehicles.

On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electric vehicles (EVs). California currently has no authority to implement these standards.

On June 11, 2025, the NHTSA published the final rule, "Resetting the Corporate Average Fuel Economy Program." This rule does not immediately change current fuel economy standards; however, the rule clarifies the NHTSA's interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered electric vehicles (EVs) when identifying the "maximum feasibility" average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

## STATE

Current state of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05, EO B-55-18, Assembly Bill (AB) 32, AB 1279, Senate Bill (SB) 32, and SB 375.

### Executive Order S-03-05

EO S-03-05, signed June 1, 2005, set the following GHG reduction targets for the State:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

### Assembly Bill 32, the Global Warming Solutions Act (2006)

AB 32 was passed by the California State legislature on August 31, 2006, to place the State on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

## Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 and AB 197, making the executive order goal for year 2030 into a statewide, mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

## Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of $CO_2e$ from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

### *2022 Climate Change Scoping Plan*

CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the State's anthropogenic GHG emissions (CARB 2022). The Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous scoping plans focused on specific GHG reduction targets for industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. This Plan expands upon earlier scoping plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent IPCC AR6; the measures would achieve 85 percent below 1990 levels by 2045 in accordance AB 1279. CARB's 2022 Scoping Plan identifies strategies as shown in Table 3.8-3, *Priority Strategies for Local Government Climate Action Plans*, that would be most impactful at the local level for ensuring substantial process toward the State's carbon neutrality goals.

### Table 3.8-3 Priority Strategies for Local Government Climate Action Plans

| Priority Area | Priority Strategies |
|---|---|
| Transportation Electrification | Convert local government fleets to zero-emission vehicles (ZEV) and provide EV charging at public sites. |
| | Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans). |
| VMT Reduction | Reduce or eliminate minimum parking standards. |
| | Implement Complete Streets policies and investments, consistent with general plan circulation element requirements. |
| | Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc. |
| | Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking |
| | Implement parking pricing or transportation demand management pricing strategies. |
| | Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood). |
| | Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements) |
| Building Decarbonization | Adopt all-electric new construction reach codes for residential and commercial uses. |
| | Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers). |
| | Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances. |
| | Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing). |
| | Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings). |

Source: CARB 2022.

Based on Appendix D of the 2022 CARB Climate Change Scoping Plan, for residential and mixed-use development projects, CARB recommends first demonstrating that these land use development projects are aligned with State climate goals based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing. Attributes that accommodate growth in a manner consistent with the GHG and equity goals of SB 32 have all the following attributes:

- Transportation Electrification
  - Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.
- VMT Reduction
  - Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
  - Does not result in the loss or conversion of the State's natural and working lands;
  - Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS);
  - Reduces parking requirements by:
    - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or
    - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or
    - For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
  - At least 20 percent of the units are affordable to lower-income residents;
  - Result in no net loss of existing affordable units.
- Building Decarbonization
  - Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking (CARB 2022).

If the first approach to demonstrating consistency is not applicable (such as in the case of this school modernization project), the second approach to project-level alignment with state climate goals is to achieve net zero GHG emissions. The third approach to demonstrating project-level alignment with state climate goals is to align with GHG thresholds of significance,

which many local air quality management (AQMDs) and air pollution control districts (APCDs) have developed or adopted (CARB 2022).

## Assembly Bill 1279

AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels. SB 1279 also requires CARB to update the Scoping Plan to address these new targets.

## Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). SCAG is the MPO for the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

### *SB 375 Regional Targets*

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018 (CARB 2018). All sustainable community's strategies (SCS) adopted after October 1, 2018, are subject to these new targets. The SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks compared to 2005. This excludes reductions anticipated from implementation of state technology and fuels strategies and any potential future state strategies such as statewide road user pricing. The proposed targets call for greater per-capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translates into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets (CARB 2025a).

## Transportation-Sector-Specific Regulations

### *Advanced Clean Fleets and Advanced Clean Trucks*

CARB adopted the Advanced Clean Fleets (ACF) regulation in 2023 to accelerate the transition to zero-emission medium- and heavy-duty vehicles. In conjunction with the Advanced Clean Trucks regulation, the ACF regulations helps to ensure that medium- and heavy-duty ZEVs are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public charging infrastructure network.

### *Assembly Bill 1493*

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the USEPA. In 2012, the USEPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles. See also the previous discussion in federal regulations under “Update to Corporate Average Fuel Economy Standards (2017 to 2026).”

In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of ZE vehicles into a single package of standards. Under California’s Advanced Clean Car program, by 2025 new automobiles will emit 34 percent less GHG emissions and 75 percent less smog-forming emissions (CARB 2017a).

### *Executive Order S-01-07*

On January 18, 2007, the State set a new low-carbon fuel standard (LCFS) for transportation fuels sold in the State. EO S-01-07 set a declining standard for GHG emissions measured in $CO_2e$ gram per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California’s transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels, and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the “fuel cycle.”

### *Executive Order B-16-2012*

On March 23, 2012, the State identified that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle

Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZE vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). EO B-16-2012 also directed the number of ZE vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The executive order also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

### *Executive Order N-79-20*

On September 23, 2020, Governor Newsom signed EO N-79-20, whose goal is that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the State are ZE by 2045, where feasible. The EO's goal for the two is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible. In August 2022, CARB approved the new Advanced Clean Cars II standards that will ensure all new passenger cars, trucks and SUVs sold in the State will be zero-emitting by 2035 (CARB 2025b). The Advanced Clean Cars II standards will amend the Zero-Emission Vehicle Regulation to require an increase in zero-emission vehicles and amends the Low-Emission Vehicle Regulations to include more stringent standards for gasoline cars and heavier passenger trucks to continue to reduce smog-forming emissions.

## Renewables Portfolio: Carbon Neutrality Regulations

### *Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08*

A major component of California's Renewable Energy Program is the renewables portfolio standard established under SBs 1078 (Sher) and 107 (Simitian). Under the Renewable Portfolio Standard (RPS), certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least one percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the State's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

### *Senate Bill 350*

SB 350 (de Leon) was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new

goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

### *Senate Bill 100*

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

### *Senate Bill 1020*

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

## Energy Efficiency Regulations

### *California Energy Code*

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR], California Energy Code). The California Energy Code (Building Energy Efficiency Standards) requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods.

The 2022 Building Energy Efficiency Standards on August 11, 2021, and they went into effect on January 1, 2023. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards, among other approaches. The 2022 standards require mixed-fuel single-family homes to be electric-ready to accommodate replacement of gas appliances with electric appliances. In addition, the new standards include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2022).

The 2025 Building Energy Efficiency Standards were adopted September 24, 2024, and became effective and replaced the 2022 Building Energy Efficiency Standards on January 1, 2026. Updates under the 2025 Building Energy Efficiency Standards include electric-ready requirements for some multi-family buildings and commercial kitchens and solar and battery energy storage requirements for assembly buildings including religious worship, sports, and recreational buildings.

### *California Green Building Standards Code*

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update became effective on January 1, 2026, and updates residential and non-residential voluntary measures.

Overall, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. CALGreen contains requirements for construction site selection, stormwater control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

### *2006 Appliance Efficiency Regulations*

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

## Solid Waste Diversion Regulations

### *AB 939: Integrated Waste Management Act of 1989*

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the State to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

### *AB 341*

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

### *AB 1327*

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

### *AB 1826*

In October of 2014, Governor Brown signed AB 1826 requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the State implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

## Water Efficiency Regulations

### *SBX7-7*

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of a 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

### *AB 1881: Water Conservation in Landscaping Act*

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

## Short-Lived Climate Pollutant Reduction Strategy

### *Senate Bill 1383*

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and $CH_4$. Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 required the State board no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the State's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017b). In-use on-road

rules are expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

## REGIONAL

### SCAG's 2024-2050 RTP/SCS

SB 375 requires each MPO to prepare a sustainable communities strategy in its regional transportation plan (RTP/SCS). For the SCAG region, the 2024-2050 RTP/SCS, Connect SoCal, was adopted on April 4, 2024, and is an update to the 2020-2045 RTP/SCS. In general, the RTP/SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

Connect SoCal focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land use strategies in development of the SCAG region through the horizon year 2050 (SCAG 2024). Connect SoCal forecasts that the SCAG region will meet its GHG per capita reduction targets of 8 percent by 2020 and 19 percent by 2035. It also forecasts that implementation of the plan will reduce VMT per capita in year 2050 by 6.3 percent compared to baseline conditions for that year. Connect SoCal includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods, while expanding mobility choices by locating housing, jobs, and transit closer together; and increasing investments in transit and complete streets (SCAG 2024).

### Riverside-San Bernardino-Ontario MSA Priority Climate Action Plan

In March 2024, the regional Riverside-San Bernardino-Ontario metropolitan statistical area (MSA) Priority Climate Action Plan (PCAP) was developed by three councils of governments: Coachella Valley Association of Governments (CVAG), San Bernardino County Transportation Agency (SBCTA), and Western Riverside Council of Governments (WRCOG). The City of San Bernardino is a beneficiary of the PCAP, which provides a plan to reduce GHG emissions for the entire Riverside-San Bernardino-Ontario MSA based on a compilation of existing and new analysis that includes GHG inventories across all sectors, assessment of reduction potential across each sector, and the development of three regional measures (i.e., light duty vehicle infrastructure, building decarbonization, and goods movement decarbonization) (SBCTA 2024). The PCAP includes a broad range of measures geared towards addressing climate change and its impacts by reducing GHG emissions associated with sectors of energy, transportation, water, waste, offroad transportation, and agriculture. The PCAP contains existing and forecasted emissions inventory for each of the three subregions and planned GHG emission reductions by 2030 for each jurisdiction within SBCOG.

### LOCAL

### City of San Bernardino Municipal Code

The San Bernardino Municipal Code (SBMC) is organized by title, chapter, and sections. Most provisions related to energy use, which affects GHG emissions, are in the following chapter:

- **Chapter 15.04, Building Codes.** This chapter of the SBMC adopts the State Building Code under Title 24, Sections Parts 1 through 6, 8, 9, and 11 of the CCR known and designated as the 2025 California Building Code.

## 3.8.2 Existing Conditions

### CALIFORNIA'S GHG SOURCES AND RELATIVE CONTRIBUTION

In 2024, the statewide GHG emissions inventory was updated for 2000 to 2022 emissions using the GWPs in IPCC's AR4 and reported that California produced 371.1 $MMTCO_2e$ GHG emissions in 2022 (2.4 percent lower than 2021 levels). The 2022 emissions data show that California is continuing its established long-term trend of GHG emissions declines despite the anomalous emissions trends from 2019 through 2021 that were due in large part to the impacts of the COVID-19 pandemic. In 2014, statewide GHG emissions dropped below the 2020 GHG Limit (AB 32 target for year 2020) and have remained below the limit since that time. Additionally, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product) is declining (CARB 2024).

California's transportation sector was the single-largest generator of GHG emissions, producing 37.7 percent of the state's total emissions. Industrial sector emissions made up 19.6 percent, and electric power generation made up 16.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include residential and commercial (10.6 percent), agriculture and forestry (8.0 percent), high GWP (5.7 percent), and recycling and waste (2.2 percent).

Emissions from transportation sector decreased compared to 2021, primarily due to a greater share of fuels used for on-road transportation being produced from non-fossil resources. Industrial sector decreases from 2021 to 2022, most notably in the oil and gas production sector. Electricity emissions also decreased compared to 2021 from the continued growth of in-state solar generation and increases to in-state hydropower and imported wind power. High-GWP gases continue to replace ozone-depleting substances (ODS) being phased out under the 1987 Montreal Protocol and emissions from this sector have been stable from 2020 to 2022 (CARB 2024).

## EXISTING COMMUNITYWIDE GHG EMISSIONS

The existing land uses in the General Plan Update Area consists of a mix of residential neighborhoods, commercial corridors and centers, industrial districts, civic and educational facilities, parkland, and open spaces. Operation of these land uses generates GHG emissions from natural gas used for energy, heating, and cooking; electricity usage; vehicle trips for employees and residents; area sources such as landscaping equipment and consumer cleaning products; water demand; waste generation; and solid waste generation.[4]

Table 3.8-4, *Existing GHG Emissions Inventory for the City of San Bernardino,* shows the emissions associated with existing land uses in the General Plan Update Area.

**Table 3.8-4 Existing GHG Emissions Inventory for the City of San Bernardino**

| Sector | Existing $MTCO_2e$/year | Percent of Total |
|---|---|---|
| Building Electricity | 213,221 | 12% |
| Building Natural Gas | 279,734 | 16% |
| On-Road Transportation | 1,001,602 | 57% |
| Off-Road Vehicles and Equipment | 27,145 | 2% |
| Solid Waste/Landfills | 70,309 | 4% |
| Refrigerants | 149,136 | 9% |
| Water Use | 2,449 | <1% |
| Wastewater Treatment | 1,195 | <1% |
| **Subtotal** | 1,745,838 | 100% |
| **Service Population (SP)[1]** | 503,082 | NA |
| **$MTCO_2e$/SP** | 3.5 | NA |

Source: Appendix C.

Note: Totals may not add to 100% due to rounding.

1. Service Population (SP) consists of the aggregate of total employees and population within the General Plan Update Area, which includes the City and its SOI.

[4] Emissions from water demand and wastewater are emissions associated with electricity used to supply, treat, and distribute water.

## 3.8.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning greenhouse gas emissions. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning greenhouse gas emissions if it would:

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

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

### CONSISTENCY WITH STATEWIDE GHG REDUCTION TARGETS

The General Plan Update forecasts growth in the General Plan Update Area through year 2050; therefore, this EIR analyzes the potential for the proposed project to conflict with statewide GHG reduction goals identified in the CARB Scoping Plan that are applicable to local governments. This includes AB 1279, which requires an 85 percent reduction in GHG emissions by 2045 to stabilize $CO_2e$ emissions and avoid the most catastrophic impacts of climate change as well as substantial progress toward carbon neutrality.[5]

Based on the existing inventory in Table 3.8-5, a trajectory consistent with the State's GHG emissions target is estimated to be:

- 250,087 $MTCO_2e$ by Year 2050[6]

[5] The 2022 Scoping Plan includes statewide measures to achieve the state's carbon neutrality goals under Executive Order B-55-18 such as carbon dioxide removal (CDR) that are not applicable to local governments. Carbon neutrality goals are a "no impact" level and not a "less than significant" impact level for climate change effects. There are presently no reliable means of forecasting how future technological developments related to carbon dioxide removal may affect future emissions in a planning jurisdiction. Therefore, carbon neutrality targets are not directly applicable to local governments and CEQA projects to mitigate GHG emissions impacts of a proposed project. Moreover, AB 1279 GHG reduction targets for 2045 are in line with the scientifically established levels needed in the U.S. to limit global warming below 1.5 to 2.0 degrees Celsius, the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels. For these reason, the targets of AB 1279 are applicable to the EIR. However, the CAP includes measures that align with the state's carbon neutrality goals under Executive Order B-55-18 and per-capita targets under SB 32.

[6] AB 1279 establishes a statewide target of reducing GHG emissions to at least 85 percent below 1990 levels by 2045. Because a 1990 jurisdiction-specific GHG inventory is not available, the proportional statewide reduction

## MASS EMISSIONS AND HEALTH EFFECTS

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al.* (Friant Ranch), the California Supreme Court determined that the EIR for the proposed Friant Ranch project failed to adequately analyze the project's air quality impacts on human health. The EIR prepared for the project, which involved a master planned retirement community in Fresno County, showed that project-related mass emissions would exceed the San Joaquin Valley Air Pollution Control District's regional significance thresholds. In its findings, the California Supreme Court affirmed the holding of the Court of Appeals that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criterion air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health.

In 2009, the USEPA issued an endangerment finding for six GHGs ($CO_2$, $CH_4$, $N_2O$, HFCs, PFCs, and $SF_6$) in order to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heatwaves and ozone levels. The effects of climate change are identified in Table 3.8-2. Though identified effects such as sea level rise and increased extreme weather can indirectly impact human health, neither the USEPA nor CARB has established ambient air quality standards for GHG emissions. The State's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change. Yet the State's GHG reduction goals and strategies are based on the State's path toward reducing statewide cumulative GHGs as outlined in AB 32, SB 32, EO S-03-05, and AB 1279.

The two significance thresholds that the City uses to analyze GHG impacts are based on achieving the statewide GHG reduction goals (GHG-1) and relying on consistency with policies or plans adopted to reduce GHG emissions (GHG-2). Further, because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions and given the cumulative nature of GHG emissions and the City's significance thresholds, which are tied to reducing the State's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

target was applied to the City's most recent emissions inventory year (2025) as a surrogate baseline. The resulting 2050 GHG reduction target of 250,087 $MTCO_2e$ represents the City's equivalent share of the statewide 85-percent-below-1990 reduction requirement, scaled to the jurisdiction's existing emissions inventory.

## METHODOLOGY

This GHG evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely to occur in conjunction with future development that would be accommodated by the proposed project. The emissions inventory and forecast for the proposed project utilizes a community emissions accounting method that includes sources that are in the indirect and direct jurisdictional control of the General Plan Update Area (geographic region).[7] The community GHG emissions inventory and forecast is based on activity data compiled for the proposed project. The community emissions inventory was compiled using the *United States Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions* (U.S. Community Protocol) accounting protocols, which were first developed in 2012 and last updated in 2019. The proposed General Plan Update's GHG emissions inventory includes the following sectors.

- **Building Energy.** Emissions associated with natural gas use for residential and nonresidential land uses in the General Plan Update Area were modeled based on data provided by the Southern California Gas Company (SoCalGas) for years 2020 through 2024. Existing natural gas emissions are based on the four-year average (2022-2025) to account for fluctuations in energy use.[8] Forecasts are adjusted for increases in dwelling units for residential natural gas use and non-residential square footage for non-residential natural gas use in the General Plan Update Area.
- **Transportation.** Transportation emissions forecasts were modeled using emissions data from CARB's EMFAC2021 V1.0.2 web database. Model runs were based on daily vehicle miles traveled (VMT) data provided by KOA (see Appendix I-1) and calendar year 2025 (existing) and 2050 emission rates. The VMT is based on the origin-destination method using the San Bernardino Transportation Analysis Model+ (SBTAM+) and includes the full trip length for land uses in the city and a 50 percent reduction in the trip length for external-internal/internal-external trips based on the recommendations of CARB's Regional Targets Advisory Committee under SB 375. Consistent with CARB's methodology within the Climate Change Scoping Plan Measure Documentation Supplement, daily VMT was multiplied by 347 days per year to account for reduced traffic on weekends and holidays to determine annual emissions.
- **Off-Road Equipment.** OFFROAD is a database of equipment use and associated emissions for each county compiled by CARB. Off-road equipment in the plan area is based on year 2025 (existing) and 2050 (forecasted) emission rates for San Bernardino County obtained from CARB's Off-Road Web Query V.1.1.2 web database. OFFROAD was used to estimate

[7] Emissions from permitted sources are excluded from the existing emissions inventory because the reductions associated with the Industrial sector are regulated separately by South Coas AQMD or are otherwise not under the jurisdiction of the City or its SOI.

[8] The 2025 natural gas usage value was interpolated based on previous usage for years 2020 to 2024.

criteria air pollutant emissions from lawn and garden, light commercial, and construction equipment in the County and General Plan Update Area. In order to determine the percentage of emissions attributable to the General Plan Update Area, light commercial equipment is estimated based on employment for the plan area as a percentage of San Bernardino County and forecast based on the change in employment in the plan area. Construction equipment use is estimated based on building permit data for the plan area and San Bernardino County from data compiled by the US Census and assumes that construction emissions for the forecast year would be similar to historical levels. Lawn and garden equipment is based on the percentage of housing units in plan area compared to San Bernardino County and forecast based on the change in housing growth in the plan area.

- **Refrigerant Leakage.** Refrigerants are based on the statewide 2021 refrigerant use and statewide population based on the 2021 census data in order to derive emissions per person.
- **Solid Waste Disposal.** GHG emissions from solid waste disposed of by residents and employees in the plan area were quantified based on the waste-in-place method. This method assumes that the degradable organic component in waste decays slowly throughout a few decades, during which $CH_4$ and biogenic $CO_2$ are formed. If conditions are constant, the rate of $CH_4$ production depends solely on the amount of carbon remaining in the waste. As a result, emissions of $CH_4$ from waste deposited in a disposal site are highest in the first few years, then gradually decline. Significant $CH_4$ production typically begins one or two years after waste disposal in a landfill and continues for 10 to 60 years or longer. Waste disposal was averaged over several years to account for fluctuations in average annual solid waste disposal. Waste generated was based on data obtained from the California Department of Resources Recycling and Recovery (CalRecycle), latest 2024 data was used to provide an estimate of GHG emissions for existing conditions. GHG emissions from solid waste disposal in the baseline year were modeled using CARB's Landfill Emissions Tool v.1.9, which includes waste characterization data from CalRecycle. Because the landfill gas captured is not under the jurisdiction of the City of San Bernardino, the landfill gas emissions from the capture system are not included in the inventory. Only fugitive sources of GHG emissions from landfills are included. Modeling assumes a 75 percent reduction in fugitive GHG emissions from the landfill's Landfill Gas Capture System. The landfill gas capture efficiency is based on CARB's LGOP, v.1.1. Total GHG emissions from waste disposal in 2024 were forecast based on the percent increase in population for the plan area. The emissions forecast does not account for reductions from increasing waste diversion.
- **Water Use and Wastewater Treatment.** GHG emissions from this sector include indirect GHG emissions from the embodied energy associated with water use and wastewater generation and fugitive GHG emissions from processing wastewater. The total annual existing water and wastewater demands are based on the San Bernardino Municipal Water District (SBMWD) 2020 Urban Water Management Plan. The total annual proposed water and wastewater demands are based on the SBMWD 2015 Water Facilities Master Plan (refer to Appendix I-1). Electricity use from water use is estimated using energy rates identified by

in the 2022 CalEEMod Users Guide (CAPCOA 2022). Then energy is multiplied by the carbon intensity of energy. Wastewater treatment also results in direct $CH_4$ emissions from wastewater processing, which are based on the emission rates identified in the 2022 CalEEMod Users Guide (CAPCOA 2022).

Industrial sources of emissions that require a permit from South Coast AQMD are not included in the community inventory. Life-cycle emissions are not included in this analysis because not enough information is available for the proposed project; and therefore, they would be speculative.[9] Black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the state's GHG emissions inventory but treats it separately.[10]

## 3.8.4 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Development under the General Plan Update would contribute to global climate change through direct and indirect emissions of GHG from land uses in the plan area. A general plan does not directly result in development without subsequent approvals of development projects. The Development Code Update would largely ensure that the code is consistent with the General Plan Update and DTSP land use designations.

[9] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials is also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

[10] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, *Air Quality*. The majority of anthropogenic sources come from transportation—specifically, heavy-duty vehicles. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion (CARB 2022).

## General Plan Update Emissions Forecast

Buildout of the General Plan Update is not linked to a specific development time frame but is assumed over a 25-year horizon. Implementation of the General Plan Update by the horizon year of 2050 would result in a net increase of 63,625 residents, 60,500 employees, and 1,595,171 daily VMT at buildout. The community GHG emissions inventory for the General Plan Update at buildout compared to existing conditions is in Table 3.8-5, *City of San Bernardino GHG Emissions Forecast*.

As shown in the table, buildout of the land uses accommodated under the General Plan Update would result in a net increase in GHG emissions from existing conditions. However, GHG emissions per service population (SP) would decrease. The primary reason for the decrease in GHG emissions per SP is due to regulations adopted to reduce GHG emissions and turnover of California's on-road vehicle fleets.

**Table 3.8-5 City of San Bernardino GHG Emissions Forecast**

| Emissions Sector | GHG Emissions ($MTCO_2e$/year) | | | | | |
|---|---|---|---|---|---|---|
| | Existing (2025) | % | General Plan Update (2050) | % | Net Change | % |
| Building Electricity | 199,684 | 12% | 213,221 | 12% | 13,537 | 7% |
| Building Natural Gas | 195,328 | 12% | 280,648 | 16% | 85,320 | 44% |
| On-Road Transportation | 1,071,954 | 64% | 1,001,602 | 57% | -70,352 | -7% |
| Off-Road Vehicles and Equipment | 22,199 | 1% | 27,145 | 2% | 4,946 | 22% |
| Solid Waste/Landfills | 42,593 | 3% | 70,309 | 4% | 27,717 | 65% |
| Refrigerants | 120,459 | 7% | 149,136 | 9% | 28,676 | 24% |
| Water Use | 12,219 | 1% | 2,449 | <1% | -9,770 | -80% |
| Wastewater Treatment | 2,798 | <1% | 1,195 | <1% | -1,603 | -57% |
| **Total Community Emissions** | 1,667,234 | 100% | 1,745,705 | 100% | 78,471 | 5% |
| **Trajectory to AB 1279 for Year 2045** | **250,087** | **-85%** | **Does Not Achieve Target** | — | — | — |
| Service Population[1] (SP) | 378,957 | — | 503,082 | — | 124,125 | 33% |

| Emissions Sector | GHG Emissions ($MTCO_2e$/year) | | | | | |
|---|---|---|---|---|---|---|
| | Existing (2025) | % | General Plan Update (2050) | % | Net Change | % |
| $MTCO_2e$/SP | 4.4 | — | 3.5 | — | -0.9 | -21% |
| DTSP $MTCO_2e$ (estimate) | 217,747 | | | | | |

Source: Appendix C.

Note: Based on GWPs in the IPCC Fifth Assessment Report (AR5). Emissions may not total to 100 percent due to rounding.

1. Service population consists of the aggregate of total employees and population within the plan area, which includes the City of San Bernardino and its SOI.

## Consistency with the State's GHG Reduction Targets and Carbon Neutrality Goals

To determine whether the General Plan Update would result in a potentially significant impact, this EIR evaluates consistency of the General Plan Update with the State's 2045 GHG reduction target for carbon neutrality. Under the General Plan Update, new growth would be focused in areas of the city where services exist or can be redeveloped near transportation corridors. However, even with the planned intensification of existing development and transit-oriented development, as identified in Table 3.8-5, the General Plan Update would result in an increase in GHG emissions and would not achieve an 85 percent reduction in GHG emissions by 2045 without additional State and local GHG reduction measures.

While growth in the plan area would cumulatively contribute to GHG emissions impacts, implementation of the General Plan Update policies could also help minimize energy and mobile-source emissions. As listed in Table 3.8-6, *GHG Emissions: Proposed General Plan Update Policies*, policies under the Land Use and Urban Form (LUD) and Utilities and Infrastructure (UI) Element would contribute to reducing emissions from energy consumption by increasing energy efficiency and transitioning from natural gas to all-electric appliances and renewable energy systems. Policies LUD-6.1, LUD-6.5, CM-3.2, CM-3.3, CM-3.4, and OSC-7.7 would contribute to reducing GHG emissions from mobile sources by supporting the expansion of alternatives to single-occupancy vehicle use, promote pedestrian friendly development in urban areas, and support multimodal transportation improvements in accordance with the Circulation Element.

### Table 3.8-6 GHG Emissions: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-5.5* | **Environmental land uses.** Require technical studies when reviewing new developments to ensure that they do not impose unacceptable levels of noise, air pollution, traffic, dust, vibration, odors, or other detrimental impacts on nearby sensitive land uses. |
| LU-5.6 | **Reducing impacts from existing incompatible uses.** Where existing land uses that have been approved and built adversely impact sensitive uses, work with affected parties to seek funding and develop creative ways to reduce the negative impacts on sensitive land uses. |
| LU-6.1 | **Urban form to reduce GHG emissions**. Promote residential, commercial, and industrial development within urbanizing areas that is compact, pedestrian friendly, and served by transportation options along major corridors and in key activity areas. |
| LU-6.2 | **Adaptive reuse of buildings for sustainability.** Encourage the adaptive reuse of existing structures, buildings, and improvements to minimize water and energy use, capitalizing on a building's embodied energy, and supporting environmental sustainability. |
| LU-6.3 | **Net-zero buildings.** Encourage new or expanded commercial and industrial projects exceeding 100,000 square feet of gross floor area, such as big-box stores, warehouses, distribution centers, and similar uses, to set a goal to achieve net zero energy and water uses. |
| LU-6.4 | **Measures to reduce GHG emissions from buildings.** Encourage incorporation of measures to reduce or eliminate preventable GHG emissions in new projects exceeding 100,000 square feet of gross floor area. Measures may include, but are not limited to:<br>▪ Reducing on-site energy consumption.<br>▪ Increasing on-site energy generation and storage.<br>▪ Supporting renewable energy projects in the city.<br>▪ Reducing vehicle trips and waste generation. |
| LUD-6.5* | **Transportation measures to reduce GHG emissions.** Implement multi-modal transportation improvements, transportation demand management programs, and encourage use of mass transit, car-pooling, ridesharing, and telecommuting in accordance with policy and program guidance in the Circulation Element. |
| LU-6.6* | **Sustainable landscapes.** Require new development projects to use, and encourage existing development to retrofit properties to use low impact landscaping techniques that enhance habitat quality, reduce water use, support a diverse ecosystem, and increase resilience to a changing climate. |
| LU-6.7* | **Heat island mitigation**. Require private development to incorporate measures that are intended to materially reduce the heat island effect and promote climate resiliency through measures such as:<br>▪ Planting trees and landscaping.<br>▪ Installing green or cool roofs.<br>▪ Increased tree canopy in parking lots.<br>▪ Cooler permeable pavements. |

### Table 3.8-6 GHG Emissions: Proposed General Plan Update Policies

| | |
|---|---|
| | ▪ Orienting buildings for passive cooling. |
| LU-6.9 | **Alternative energy generation sources.** Promote and facilitate technologies that reduce the burning of fossil fuels and their deleterious impact on the environment. Examples include, but are not limited to:<br>▪ Alternative (non-fossil fuel) fueling stations and power sources for autos and trucks.<br>▪ Alternative energy sources, including hydroelectricity, solar, and wind to the extent feasible.<br>▪ Emergent zero emission technology for trains and mass transit alternatives**.** |
| **Circulation and Mobility Element** | |
| CM-3.2 | **Transit amenities.** Upgrade transit stops with amenities (e.g., pedestrian-scale lighting, shelter, seating, secure bicycle parking, signage) that create safer and more comfortable experiences for transit users. Prioritize improvements along major transit corridors, focus areas, highly used transit stops, and mobility hubs. |
| CM-3.3 | **First- and last-mile connections.** Provide sidewalks and bikeways, with enhanced intersection treatments, (e.g., raised medians, pedestrian beacons) at transit nodes to complete first- and last-mile connections. |
| CM-3.4 | **Mobility hubs.** Enhance mobility hubs at major points of interest, such as the Downtown Transit Center, Santa Fe Depot, and Cal State campus, with programs such as bike-sharing, scooter-sharing, and EV charging stations. |
| CM-4.1* | **TDM ordinance.** Develop and implement a citywide Transportation Demand Management Ordinance, including incentives for new developments to provide clarity and additional guidance for the Traffic Impact Analysis Guidelines on how to mitigate VMT. |
| CM-4.2 | **TDM strategies.** Promote TDM strategies appropriate for the local context and land use, for example, to reduce employee commute trips or to reduce discretionary trips such as residential, shopping, or other. |
| CM-4.3* | **TDM in new development.** Require new developments to prioritize the incorporation of TDM strategies into project design at the outset as a means to reduce vehicle miles traveled (VMT) and improve air quality. |
| CM-4.4 | **TDM monitoring.** Ensure that responsible parties adhere to required TDM commitments that were made as part of their conditions of approval through annual reporting of implemented strategies such as transit incentives, bike facilities, or carpool programs. |
| CM-5.4 | **Alternative truck fueling.** Permit a wide range of truck (re)fueling/recharging stations near industrial areas that offer alternative fuels to diesel, such as electricity, hydrogen, natural gas, and other non-fossil-based fuels. |
| CM-7.2 | **Green energy.** Explore opportunities to accommodate new vehicle technology and alternative fuels by siting new charging/fuel stations, acquiring new vehicles, and implementing other measures to reduce GHG emissions from the City's transportation sector. |

### Table 3.8-6 GHG Emissions: Proposed General Plan Update Policies

| | |
|---|---|
| CM-7.3 | **Partnerships.** Explore opportunities with private-sector partners such as micromobility, EV infrastructure, artificial intelligence, and data systems companies to experiment with innovative technologies. |
| **Open Space and Conservation Element** | |
| OSC-7.7* | **Indirect sources.** Support California and federal regulations that aim to reduce and control air pollution from indirect sources. This includes support for:<br>▪ Reducing emissions from warehouse operations.<br>▪ Reducing emissions from railyard operations.<br>▪ Reducing GHG emissions from power plants.<br>▪ Reducing emission levels from local airports. |
| OSC-7.9 | **Alternative transportation.** Support the expansion of alternatives to single-occupancy vehicle use, including but not limited to:<br>▪ Expanding the number and frequency of bus routes.<br>▪ Extending commuter rail infrastructure and trains.<br>▪ Building out the full pedestrian and bicycle network.<br>▪ Working with Omnitrans to support rider incentives. |
| OSC-7.10* | **Trucking emissions.** Enforce regulations to reduce the level of pollution and particulate matter emitted in San Bernardino. This includes:<br>▪ Restricting idling for heavy duty trucks.<br>▪ Siting fuel stations for low emission trucks.<br>▪ Enforcing compliance with adopted truck routes.<br>▪ Exploring incentives for zero emission vehicles. |
| **Utilities and Infrastructure Element** | |
| UI-1.2 | **Infrastructure Management**. Provide for the timely maintenance, renovation, replacement, and expansion of wastewater collection and treatment facilities to eliminate service deficiencies. |
| UI-1.6 | **Wastewater Treatment Operations.** Operate the wastewater collection and treatment system in a manner that minimizes sewer overflows, complies with NPDES permit provisions, and minimizes infiltration. |
| UI-5.1 | **Public facility and infrastructure energy use**. As cost feasible, maximize energy efficiency without reducing public safety or service levels by incorporating proven energy advancements in City facilities and infrastructure:<br>▪ Street infrastructure such as lighting, signals, etc.<br>▪ Buildings and facilities, both interior and exterior.<br>▪ City fleet, public transit, and trains<br>▪ Water, sewer, and other infrastructure |
| UI-5.2 | **Energy efficient building design**. Encourage and require, to the extent applicable, the incorporation of best practices in the design and operation of buildings. Examples include:<br>▪ Passive and active solar and wind design concepts. |

### Table 3.8-6 GHG Emissions: Proposed General Plan Update Policies

| | |
|---|---|
| | ▪ Cool roofs, green roofs, and rooftop gardens.<br>▪ Energy efficiency internal building components. |
| UI-5.3 | **Renewable energy systems in new development**. Increase the installation of on-site renewable energy systems, battery storage, and micro-grids in projects encourage buildings to install such systems. |
| UI-5.4 | **Solar energy.** Continue to support and facilitate the expansion of solar energy projects on residential units, nonresidential, and public facilities through incentives, development codes, and public education. |
| UI-5.5 | **Alternative energy generation**. Diversify the City's energy portfolio through the development of alternative energy technologies that include, but are not limited to:<br>▪ Methane recovery from landfills and fuel cells.<br>▪ Energy generation at wastewater treatment plants.<br>▪ Hydroelectricity from water infrastructure turnouts.<br>▪ Geothermal energy at City facilities where feasible. |
| UI-6.2* | **Capacity expansion**. Require improvements to the existing street light system, electricity or natural systems, or telecommunications necessitated by a new development proposal be funded by that development. |
| **Health and Environmental Justice Element** | |
| HEJ-5.1 | **Sensitive land use adjacent to sources of pollution.** Discourage the development of sensitive land uses (e.g., schools, playgrounds, housing, health-care facilities, and elder and childcare centers) within 500 feet of sources of air pollution. Sources of air pollution include but are not limited to freeways, railyards, mining, and industrial uses with manufacturing, dust emissions, or high truck traffic. |
| HEJ-5.2 | **Railyard air pollution.** Support the reduction of pollution exposure and adverse health impacts from the railyards. Work with BNSF to reduce the level of on-site pollution generated from mechanical equipment and switcher locomotives; monitor air pollution emanating from the yard as a result of expanded rail volume. |
| HEJ-5.3 | **Trucking routes.** Develop, maintain, and amend as needed a comprehensive system of local truck routes that meets the needs of the City's logistics economy while protecting residential and sensitive land uses from the air pollution emissions from trucks. Require logistics uses to mitigate impacts to the extent feasible. |
| HEJ-5.4 | **Air quality monitoring.** Work with the AB617 working group and other agencies to track air pollution, both stationary and mobile, to evaluate air quality and track air emissions such as particulate matter (PM), black carbon, fugitive dust, and other key pollutants. |
| HEJ-5.5* | **Pollution impacts.** Require new or substantially expanded industrial and manufacturing uses to conduct an analysis of impacts from pollution emissions. Require implementation of pollutant mitigation measures determined to be feasible at the time of project approval. |

* Denotes mitigating policies.

Implementation of these General Plan Update policies would contribute to minimizing GHG emissions associated with the City to the extent feasible. However, GHG emissions are projected to increase 5 percent more than the existing conditions and would not result in the 85 percent reduction from existing conditions necessary to ensure the City is on a trajectory to achieve the long-term reductions goals of AB 1279 and substantial progress to the State's goal of carbon neutrality.

The primary mechanism through which local jurisdictions can ensure consistency with the State's GHG reduction goals is the preparation of a Climate Action Plan (CAP). The City of San Bernardino is a beneficiary of the regional PCAP developed by three councils of governments: CVAG, SBCTA, and WRCOG. The PCAP provides a plan to reduce GHG emissions for the entire Riverside-San Bernardino-Ontario MSA based on a compilation of existing and new analysis that includes GHG inventories across all sectors, assessment of reduction potential across each sector, and the development of three regional measures (SBCTA 2024). However, the regional PCAP has not been formally adopted by the City of San Bernardino.

Additional GHG reduction strategies would be necessary to achieve the long-term targets of AB 1279. Therefore, GHG emissions impacts for the General Plan Update are considered **potentially significant** in regard to meeting the State's long-term year reduction goals and substantial progress toward carbon neutrality.

**Significance Without Mitigation:** Potentially significant.

**Impact GHG-1a: Implementation of the General Plan Update would result in an increase in GHG emissions and would not achieve the GHG reduction goals established under AB 1279.**

> **Mitigation Measure GHG-1.** The City of San Bernardino shall prepare a Climate Action Plan (CAP) to align GHG emissions targets in the City with the GHG reduction targets of Assembly Bill (AB) 1279. The CAP shall be completed within 60 months of certification of the General Plan Update EIR. The CAP shall be updated every five years to ensure the City is monitoring the plan's progress toward achieving the City's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving the specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP. The CAP shall include the following:
>
> - GHG inventories of existing and forecast year GHG levels.
> - Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction and carbon neutrality goal for year 2045 of

Assembly Bill 1279. These may include measures identified in the Priority Climate Action Plan (PCAP) for the San Bernardino County Transportation Authority (SBCTA) region, but are not limited to:

- Encouraging electric vehicle adoption through incentive or education programs.
- Adopting local ordinances or policies that require greater energy efficiency, waste reduction, and water conservation in new construction, additions, and/or alterations.
- Encouraging the construction of solar arrays above parking lots, as well as the integration of solar and other renewable energy generation technologies in new construction, additions, and/or alterations.
- Encouraging the incorporation of energy storage and other grid-harmonizing infrastructure in new construction, additions, and/or alterations.
- Collaborating with Southern California Edison to encourage existing developments to upgrade natural gas equipment (e.g., furnaces) with electric equipment (e.g., heat pumps).

- Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP:
  - Administration and Staffing
  - Finance and Budgeting
  - Timelines for Measure Implementation
  - Community Outreach and Education
  - Monitoring, Reporting, and Adaptive Management
  - Tracking Tools

**Significance with Mitigation:** Significant and unavoidable. Implementation of Mitigation Measure GHG-1 would ensure that the new development in the city implements the measures identified in the PCAP for the SBTCA region. Implementation of measures that increase energy water use efficiency and offset electricity use through solar panels would reduce GHG emissions from land uses accommodated under the General Plan Update to the extent feasible. However, given the growth in population and employment in the plan area, the reductions needed from existing land uses, and the magnitude of emissions reductions needed to achieve the GHG

reduction target, implementation of Mitigation Measures GHG-1 would be unlikely to achieve the substantial reductions needed to align with the GHG reductions of AB 1279. Therefore, GHG emissions impacts of the General Plan Update are considered **significant and unavoidable.**

## DOWNTOWN SPECIFIC PLAN

The DTSP area covers approximately 621 acres of the city's downtown, and the DTSP outlines the land use and development standards for the nine proposed Land Use Districts in the DTSP Area. Under implementation of the DTSP, the DTSP Area is projected to grow by 14,152 new residential units and 11,732,858 square feet of nonresidential space by 2050 (refer to Table 2-8, *Total Development in the Downtown Specific Plan*). The DTSP is included in the emissions forecast for the General Plan Update, as shown in Table 3.8-5. Because buildout of the General Plan Update would not result in the 85 percent reduction from existing conditions necessary to ensure the city is on trajectory to meet the long-term reduction goals of AB 1279 and substantial progress toward the State's carbon neutrality goals, emission impacts from the DTSP would similarly be considered **potentially significant** in regard to meeting the State's long-term year reduction goals and substantial progress toward carbon neutrality.

**Significance Without Mitigation:** Potentially significant.

**Impact GHG-1b: Implementation of the Downtown Specific Plan would result in an increase in GHG emissions and would not achieve the goals established under AB 1279.**

**Mitigation Measures**: No mitigation measures are available for the DTSP that would reduce GHG emissions to less-than-significant levels.

**Significance without Mitigation:** Significant and unavoidable. Like the General Plan Update, growth in population and employment in the DTSP Area and the magnitude of emissions reductions would not achieve the GHG reduction target of AB 1279. Therefore, GHG emissions are considered **significant and unavoidable.**

### b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, the regional PCAP, and SCAG's Connect SoCal. A consistency analysis with these plans is presented below.

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

### CARB Scoping Plan

CARB's Scoping Plan is applicable to state agencies but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require local jurisdictions to adopt its policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies from the Scoping Plan result in GHG emissions reductions at the local level. So local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the low carbon fuel standard, changes in the corporate average fuel economy standards, RPS, and triannual updates to the California building codes.

The GHG emissions shown in Table 3.8-5 include reductions associated with statewide strategies that have been adopted since AB 32, SB 32, and AB 1279. Development projects accommodated under the General Plan Update are required to adhere to the programs and regulations identified by the Scoping Plan and implemented by State, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. Future development projects would be required to comply with these state GHG emissions reduction measures because they are statewide strategies. For example, new buildings associated with land uses accommodated by the General Plan Update would be required to meet the CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits. Furthermore, as listed in Table 3.8-6, the General Plan Update includes various policies that would help reduce long-term GHG emissions in the plan area. Therefore, implementation of the General Plan Update would not obstruct implementation of the CARB Scoping Plan, and impacts would be **less than significant**.

### PCAP

The PCAP serves as a high-level roadmap for reducing GHG emissions throughout the MSA. Specifically, the PCAP includes a broad range of measures geared to addressing climate change and its impacts by reducing GHG emissions associated with sectors of energy, transportation, water, waste, off-road transportation, and agriculture. As identified in Table 3.8-7, *PCAP Consistency Analysis*, the General Plan Update would be generally consistent with many of the local PCAP measures. Implementation of the General Plan Update would result in beneficial GHG emissions impacts by contributing to reducing VMT, increasing energy and water use efficiency, and increasing renewable energy improvements. Therefore, implementation of the General Plan Update would not obstruct implementation of the regional PCAP to reduce subregional GHG emissions, and impacts would be **less than significant**.

### Table 3.8-7 PCAP Consistency Analysis

| Local PCAP Measures | Consistency Analysis |
|---|---|
| **Energy-1: Energy Efficiency for Existing Buildings.** Promote energy efficiency through programs and incentives for existing buildings. | **Consistent.** Future development under the General Plan Update would be required to be constructed in accordance with State and City building codes in existence at the time. Additionally, Policy LUD-6.2 would encourage adaptive reuse of existing buildings to minimize water and energy use. |
| **Energy-2: Outdoor Lighting.** Adopt outdoor lighting standards to reduce electricity consumption. | **Not Applicable.** This measure is specific to adopted outdoor lighting standards. However, future development under the General Plan Update would be required to be constructed in accordance with State and City building codes in existence at the time. Compliance with the California Energy Code (24 CCR Part 6) reduces outdoor lighting energy use by limiting allowable lighting power and requiring high-efficiency light fixtures. Additionally, the General Plan Update contains Policies UI-5.1 and UI-6.2, which promote improvements and maximization of energy efficiency to existing street light systems. |
| **Energy-3: Building Electrification.** Adopt building electrification targets and incentives for new commercial and residential buildings and retrofits. | **Not Applicable.** This measure is specific to electrification targets and incentives. However, the General Plan Update contains various policies related to the promotion of building electrification. For example, Policy LUD-6.3 would encourage commercial and industrial projects to set a goal to achieve net zero energy and water uses. Policies LUD-6.4, LUD-6.9, UI-5.3, UI-5.3, and UI-5.5 aim to incorporate measures to reduce GHG emissions from buildings by providing on-site alternative energy generation and storage. Moreover, future development under the General Plan Update would be required to be constructed in accordance with State and City building codes current at the time, which include provisions that support building electrification. |
| **Energy-4: Solar Installations for New Commercial and Industrial Development.** Establish a goal for solar installations on new commercial and industrial development. | **Consistent.** The General Plan Update contains various policies related to the promotion of solar installations in new commercial and industrial developments in the plan area. Policies LUD-6.9, UI-5.2, UI-5.4 aim to incorporate technologies |

**Table 3.8-7 PCAP Consistency Analysis**

| Local PCAP Measures | Consistency Analysis |
|---|---|
| | and best practices in building design that reduce the burning of fossil fuels by providing alternative energy sources, including passive and active solar. Moreover, future development under the General Plan Update would be required to be constructed in accordance with State and City building codes current at the time. Compliance with the California Energy Code (24 CCR Part 6) promotes the installation of solar photovoltaic systems for new commercial and industrial development though its mandatory solar requirements. |
| **Energy-5: On-site Solar Energy for New and Existing Warehouse Space.** Promote and incentivize solar installations. | **Consistent.** The General Plan Update contains various policies related to the promotion of on-site solar installations for new and existing warehouse space. Policy LUD-6.3 encourages new or expanded industrial projects to set a goal to achieve net zero energy and water use. Policy LUD-6.4 aims to increase on-site alternative energy generation and storage sources for new and large-scale industrial development projects. Moreover, under the California Energy Code (24 CCR Part 6), new warehouses buildings are generally required to include the installation of on-site solar photovoltaic systems or provide solar-ready areas, ensuring that these facilities generate renewable energy to offset their electricity consumption. |
| **Energy-6: Solar Installations for Existing Homes.** Increase solar installations on existing single-family homes. | **Consistent.** The General Plan Update contains various policies related to the promotion of on-site solar installations for existing homes. Policy LUD-6.2 would encourage adaptive reuse of existing buildings to minimize water and energy use. Policy UI-5.4 encourages the expansion of solar energy projects on residential units through incentives, development codes and public education. |
| **Energy-7: Solar Installations for Existing Commercial and Industrial Buildings.** Establish a goal for solar installations on existing commercial and industrial buildings. | **Not Applicable.** This measure is specific to establishing a goal for solar installations on existing commercial and industrial buildings. However, the General Plan Update contains Policy LUD-6.3, which encourages expanded industrial |

### Table 3.8-7 PCAP Consistency Analysis

| Local PCAP Measures | Consistency Analysis |
|---|---|
| | projects to set a goal to achieve net zero energy and water use. |
| **On-Road-1: Alternative Fueled Transit Fleets – CNG to Electric.** Converting County transit fleet from compressed natural gas (CNG) to electric. | **Not Applicable.** The measure is specific to the county and not cities in the county. However, Advanced Clean Cars II would require new cars sold in 2035 and beyond to be zero-emission vehicles, which includes battery electric vehicles, plug-in hybrid electric vehicles, and fuel cell electric vehicles. Future development under the General Plan Update would not obstruct implementation of Advanced Clean Cars II program since this is a requirement for auto manufacturers in California. Therefore, compliance with Advanced Clean Cars II would help increase the supply of zero-emission vehicles in California, providing the City with greater availability of electric vehicles should the City choose to pursue fleet electrification. |
| **On Road-2: Encourage Use of Mass Transit, Carpooling, Ridesharing, and Telecommuting.** Encourage alternate modes of transportation. | **Consistent.** The General Plan Update encourages the use of mass transit and contains various transportation measures to reduce GHG emissions. Policy LUD-6.1 and CM-3.2 promote compact and pedestrian-friendly areas served by transportation options. Policies LUD-6.5, OSC-7.9, and CM-4.2 through CM-4.4, support implementation of multimodal transportation improvements (e.g., expansion of bus routes and of commuter rail infrastructure) and transportation demand management programs in accordance with the Circulation Element. |
| **On Road-3: Signal Synchronization.** Improve efficiency through signal synchronization. | **Consistent.** The General Plan Update Transportation Study (Appendix I-1) recommends that the City implement a variety of strategies, including TDM measures and coordinated traffic signal operations. The study also suggests traffic signal synchronization and adaptive control improvements to enhance operational efficiency and reduce delays along key corridors. |
| **On Road-4: Expand Bike Routes.** Expand bike routes including pedestrian and bicycle friendly streets. | **Consistent.** The General Plan Update encourages the expansion and use of bike routes. Policies LUD-6.1 and OSC-7.9 support the expansion of |

**Table 3.8-7 PCAP Consistency Analysis**

| Local PCAP Measures | Consistency Analysis |
|---|---|
| | full pedestrian and bicycle networks. Additionally, the City's Active Transportation Plan (ATP) recommends bicycle, pedestrian, and accessibility improvements throughout the city. |
| **On Road-5: Community Fleet Electrification**. Encourage the adoption of electric vehicles and ensure access to EV infrastructure. | **Not Applicable.** This measure is to be taken at the City level. However, the Advanced Clean Cars II would require new cars sold in 2035 and beyond to be zero-emission vehicles, which includes battery electric vehicles, plug-in hybrid electric vehicles, and fuel cell electric vehicles. Future development under the General Plan Update would not obstruct implementation of Advanced Clean Cars II program since this is a requirement for auto manufacturers in California. By increasing the availability of zero-emission vehicles in the state, Advanced Clean Cars II supports the adoption of electric vehicles and helps ensure that residents have greater access to necessary EV infrastructure, such as charging stations, as electric vehicle use expands. Additionally, CALGreen requires new residential and nonresidential developments to include EV charging infrastructure. These requirements help ensure that new buildings are equipped to support current and future electric vehicle use, facilitating the adoption of EVs and promoting access to reliable charging infrastructure in the plan area. Lastly, Policy CM-3.4 supports EV charging infrastructure and Policy CM-7.2 promotes new vehicle technology and alternative fuels. |
| **Off Road-1 Electric-Powered Construction Equipment.** Establish a goal for construction equipment to utilize electricity as power. | **Not applicable.** This measure involves coordination with the South Coast AQMD to establish a goal for certain construction equipment to utilize electricity.<br>As described in Section 3.6.4, *Project Impact Analysis*, of Chapter 3.6, *Energy*, it is anticipated that most electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors), resulting in minimal electricity usage. |

### Table 3.8-7 PCAP Consistency Analysis

| Local PCAP Measures | Consistency Analysis |
|---|---|
| **Off Road-2 Idling Ordinance.** Adopt an ordinance that limits idling for heavy-duty construction equipment. | **Not applicable.** This measure is specific to adopting an ordinance that limits idling for heavy-duty construction equipment beyond CARB or local air district regulations. As described in Chapter 3.6, *Energy*, construction contractors would minimize nonessential idling of construction equipment during construction in accordance with the 13 CCR Article 4.8, Chapter 9, Section 2449. |
| **Off Road-3 Electric Landscaping Equipment.** Adopt an ordinance that reduces gasoline or diesel-powered landscaping equipment use. | **Not applicable.** This measure is specific to adoption of an ordinance that reduces gasoline or diesel-powered landscaping equipment or reduces the operating time of such equipment. |
| **Waste-1 Waste Diversion.** Adopt citywide waste goals to divert waste. | **Not applicable.** This measure is specific to adopting citywide waste goals to divert more than 75 percent of waste and exceed the waste diversion goal required by AB 341. However, future development under the General Plan Update would be required to comply with the SBMC 8.24.100, Construction and Demolition Debris Recycle Program, which ensures diversion of construction and demolition waste from landfills and compliance with mandates of CalRecycle. |
| **Water-1 CALGREEN Water Efficiency Measures for New Construction.** Adopt voluntary CALGREEN water efficiency measures for new construction. | **Not applicable.** This measure is specific to adopting voluntary CALGreen water efficiency measures. However, the General Plan Update contains Policy LUD-6.6, which requires new development to use low impact landscaping techniques that reduce water use and increase resilience to climate change. |
| **Water-2 CALGREEN Water Efficiency Measures for Existing Buildings.** Adopt voluntary CALGREEN water efficiency measures for existing buildings. | **Not applicable.** This measure is specific to adopting voluntary CALGreen water efficiency measures. However, the General Plan Update contains Policy LUD-6.6, which encourages existing development to retrofit properties to use low impact landscaping techniques that reduce water use and increase resilience to climate change. |

### Table 3.8-7 PCAP Consistency Analysis

| Local PCAP Measures | Consistency Analysis |
|---|---|
| **Water-3 Water Efficient Landscaping Practices.** Encouraging water efficient landscaping practices. | **Consistent.** The General Plan Update contains Policies LUD-6.6 and LUD-6.7, which encourage both new and existing development to plant trees and use low impact landscaping techniques that conserve water use and enhance climate resilience. |
| **Wastewater-1 Methane Recovery.** Capture fugitive emissions that are emitted during the wastewater treatment process. | **Not Applicable.** The Inland Empire Utilities Agency (IEUA) is the wastewater purveyor for the City. |
| **Wastewater-2 Equipment Upgrades (Regional).** Upgrade and replace wastewater treatment and pumping equipment to be more energy efficient. | **Not Applicable.** IEUA is the wastewater purveyor for the City. However, the General Plan Update contains Policies UI-1.2 and UI-1.6, which support timely maintenance, renovation, and replacement of wastewater collection and treatment systems. |
| **Agriculture-1 Methane Capture at Large Dairies.** Install methane digesters to capture methane emissions from decomposing manure. | **Not Applicable.** The city does not have large dairies within the plan area. |
| **Land Use-1 Promote Rooftop Gardens.** Establish a goal for residences and commercial facilities to construct rooftop gardens. | **Not applicable.** This measure is specific to establishing a goal for a percentage of new residential and nonresidential uses to construct rooftop gardens. However, the General Plan Update contains Policy UI-5.2, which encourages cool roofs, green roofs, and rooftop gardens. |
| **Land Use-2 Urban Tree Planting.** Establish a tree planting or tree preservation goal. | **Not applicable.** This measure is specific to establishing a tree planting goal or tree preservation goal. However, the SBMC Chapter 12.40, Street Trees, does provide provisions related to planting and maintaining trees in public places. Additionally, Chapter 19.28, Landscaping Standards, includes the City's landscaping regulations pertaining to planting trees and shrubs. |
| **PS-1 GHG Performance Standard for New Development.** Adopt a GHG performance standard for new development. | **Not Applicable.** This measure is specific to adopting a GHG performance standard for new development. |

Source: SBCTA 2024.

### *SCAG's Connect SoCal*

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan General Plan Update Area (SCAG 2024). This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements.

As further described under Impact Discussion a) of Chapter 3.14, *Population and Housing*, implementation of the General Plan Update would directly induce population and employment growth in the city while improving the jobs-housing balance compared to both existing conditions and SCAG projections. It is important to note that the General Plan Update is a regulatory document that sets the framework for future growth and development in the plan area and does not directly result in development. Its purpose is to ensure orderly and controlled growth in the plan area. The SCAG projections are based on data and input from local jurisdictions available at the time of preparation in 2022. Connect SoCal 2024 notes that its projections represent a "snapshot in time" and as such, reflect the City's existing 2005 General Plan Land Use Plan and 5th Cycle Housing Element (SCAG 2024). Connect SoCal is updated every four years, and its next update cycle will reflect local land use and policy changes made since the previous update. Therefore, an exceedance of SCAG's projections in this context does necessarily signify substantial unplanned growth. Furthermore, proposed policies under the General Plan Update's Housing and Land Use Elements would ensure the City supports a variety of housing types and densities and provides job growth to accommodate residents in alignment with the City's 2024 6th Cycle Housing Element. Consequently, buildout in accordance with the General Plan Update would accommodate the City's expected population, housing, and job growth.

However, as described in Impact Discussion b) of Chapter 3.17, *Transportation*, the projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would increase VMT per SP beyond the State's 15 percent reduction threshold (i.e., 15 percent below No Build) and generate significant long-term GHG emissions in the SCAG region (Appendix C). Therefore, implementation of the General Plan Update would obstruct implementation of SCAG's Connect SoCal goal of reducing VMT per capita, and impacts would be **potentially significant**.

**Significance Without Mitigation:** Potentially significant.

**Impact GHG-2a: Implementation of the General Plan Update would result in a substantial increase in VMT per service population and would not be consistent with SCAG's Connect SoCal.**

**Mitigation Measures:** Implementation of Mitigation Measure GHG-1 would reduce GHG emissions under buildout of the General Plan Update, however, there are no feasible mitigation measures that can fully reduce VMT impacts at full buildout of the General Plan Update and fully reduce the General Plan Update's inconsistencies with the goals of SCAG's 2024-2050 RTP/SCS. Specific TDM measures and VMT mitigation strategies that align with the General Plan Update goals and polices would need to be tailored to the characteristics of each future development project under the General Plan Update, and their effectiveness would need to be analyzed and documented as part of the environmental review process to determine if impacts could be mitigated or if they would remain significant and unavoidable. Given that research on the effectiveness of TDM strategies continues to evolve, feasible mitigation measures should be considered based on the best data available at the time a project is considered by the City. As such, no feasible mitigation measures are available to reduce impacts at the programmatic scale of this EIR.

See Transportation Impact Discussion b) in Chapter 3.17, *Transportation*, for a list of example mitigation measures that could be implemented at the Citywide level to mitigate the significant impacts associated with the General Plan Update, as well as project-level CEQA clearances for future development projects.

**Significance with Mitigation:** Significant and unavoidable. Implementation of the General Plan Update's goals and policies have the potential to reduce VMT, increase energy and water use efficiency, and increase renewable energy in the General Plan Update Area. However, the General Plan Update is a regulatory document that sets the framework for future growth and development in the plan area and does not directly result in development, and thus VMT, use of VMT reduction strategies would need to be assessed on a project-by-project basis. Therefore, the General Plan Update would continue to be inconsistent with several of the Connect SoCal goals, and impacts would remain **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

Development projects accommodated under the DTSP are required to adhere to the programs and regulations identified by the Scoping Plan and implemented by State, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. Furthermore, as described in Section 2.6.2, *Land Use and Development Standards*, the DTSP would promote infill development and includes various land use and development standards that would help reduce long-term GHG emissions in the DTSP area. As further described in

Impact Discussion b) of Chapter 3.17, *Transportation*, the DTSP Area with the proposed land uses would have a Total VMT per SP of 24.15, which is approximately 45 percent lower than the baseline average, and would contribute to a reduced regional VMT.

However, implementation of the DTSP would result in significant and unavoidable impacts related to regional air quality, GHG emissions, and VMT. Therefore, the DTSP was found inconsistent with several SCAG's Connect SoCal goals and objectives, which emphasize reducing VMT, improving air quality, and achieving regional GHG reduction targets (refer to Table 3.11-8, *SCAG 2024-2050 RTP/SCS Goals Consistency Analysis*, in Section 3.11, *Land Use and Planning*). Accordingly, the DTSP would conflict with SCAG's Connect SoCal goals aimed at improving air quality and reducing GHG emissions. Consequently, implementation of the DTSP would not obstruct implementation of the CARB Scoping Plan or PCAP; however, the DTSP would obstruct implementation of the SCAG's Connect SoCal goals, resulting in **potentially significant** impacts.

**Significance Without Mitigation:** Potentially significant.

**Impact GHG-2b: Implementation of the Downtown Specific Plan would result in a substantial increase in VMT per service population and would not achieve several goals of SCAG's Connect SoCal.**

**Mitigation Measure:** No mitigation measures are available for the DTSP that would reduce GHG emissions to less-than-significant levels.

**Significance without Mitigation:** Significant and unavoidable. There are no feasible mitigation measures that can fully reduce the DTSP's inconsistencies with the goals of SCAG's 2024-2050 RTP/SCS. Specific TDM measures and VMT mitigation strategies that align with the DTSP standards would need to be tailored to the characteristics of each future development project under the DTSP, and their effectiveness would need to be analyzed and documented as part of the environmental review process to determine if impacts could be mitigated or if they would remain significant and unavoidable. Given that research on the effectiveness of TDM strategies is continuing to evolve, feasible mitigation measures should be considered based on the best data available at the time a project is being considered within the DTSP area. There are no feasible mitigation measures that could fully reduce DTSP's inconsistencies with the goals of SCAG's 2024-2050 RTP/SCS. Therefore, the DTSP would continue to be inconsistent with several of the Connect SoCal goals and impacts would remain **significant and unavoidable**.

## 3.8.5 Cumulative Impact Analysis

**Would the project have a cumulative effect related to greenhouse gas emissions?**

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under Greenhouse Gas Emissions Impact Discussions 'a' and 'b'

are not project-specific impacts to global warming, but are the General Plan Update's contribution to this cumulative impact. Implementation of the General Plan Update would result in a net 5 percent increase in GHG emissions in year 2050 from existing baseline and would not meet the long-term GHG reduction goal under AB 1279. Additionally, the buildout of the General Plan Update would result in a substantial increase in VMT per SP and would conflict with SCAG's Connect SoCal goals. Therefore, project-related GHG emissions associated with the General Plan Update and their contribution to global climate change would be cumulatively considerable, and GHG emissions impacts would remain **potentially significant** and **cumulatively considerable**.

**Impact GHG-3: The General Plan Update, together with cumulative projects, would substantially impact greenhouse gas emissions.**

**Significance with Mitigation:** Significant and unavoidable. Forecast GHG emissions generated by land uses accommodated by the General Plan Update would not meet the long-term GHG reduction goal under AB 1279 and substantial progress toward the State's carbon neutrality goals. Mitigation Measures GHG-1 and GHG-2 would help reduce project-related GHG emissions to the extent feasible. However, due to the programmatic nature of the General Plan Update, no additional mitigation measures are available. GHG emissions associated with the General Plan Update would be cumulatively considerable, and this impact would remain **significant and unavoidable** at the program level.

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# 3.9 HAZARDS AND HAZARDOUS MATERIALS

This section of the DEIR evaluates the potential impacts from implementation of the General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP) for the City of San Bernardino, referred to together as the "proposed project", on human health and the environment due to exposure to hazardous materials or conditions associated with project sites, project construction, and project operations of future development pursuant to the proposed project in the City of San Bernardino.

A search for hazardous materials on online databases (EnviroStor and GeoTracker) was completed on October 6, 2025 for the City of San Bernardino. This compiled information is listed in Appendix E of this DEIR.

## 3.9.1 Regulatory Framework

### FEDERAL

The primary federal agencies that are responsible for overseeing regulations and policies regarding hazardous materials are the EPA, Department of Labor Occupational Safety and Health Administration (OSHA), and the Department of Transportation (DOT). Several laws governing the transport, storage, and use of hazardous materials are governed by these agencies as well as oversight for contaminated sites cleanup. Federal laws and regulations that are applicable to hazards and hazardous materials are presented below.

### Comprehensive Environmental Response, Compensation, and Liability Act

CERCLA introduced active federal involvement to emergency response, site remediation, and spill prevention, most notably the Superfund program. CERCLA was intended to be comprehensive in encompassing both the prevention of, and response to, uncontrolled hazardous substances releases. CERCLA deals with environmental response, providing mechanisms for reacting to emergencies and to chronic hazardous material releases. In addition to establishing procedures to prevent and remedy problems, it establishes a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other regulatory programs and to remedy problems resulting from action taken before the era of comprehensive regulatory protection.

### Resource Conservation and Recovery Act

The 1976 Federal Resource Conservation and Recovery Act (RCRA) and the 1984 RCRA Amendments regulate the treatment, storage, and disposal of hazardous and non-hazardous wastes. The legislation mandated that hazardous wastes be tracked from the point of

generation to their ultimate fate in the environment. This includes detailed tracking of hazardous materials during transport and permitting of hazardous material handling facilities.

The 1984 RCRA amendments provided the framework for a regulatory program designed to prevent releases from USTs. The program established tank and leak detection standards, including spill and overflow protection devices for new tanks. The tanks must also meet performance standards to ensure that the stored material will not corrode the tanks. The RCRA was further amended in 1988 to set additional standards for USTs.

In July 2015, the EPA revised the federal UST regulation, which strengthened the 1988 federal UST regulations by increasing emphasis on properly operating and maintain UST equipment. The revision added new operation and maintenance requirements and addressed UST systems deferred in the 1988 UST regulation. The purpose of the revision was to help prevent and detect UST releases, which are a leading source of groundwater contamination. To ensure compliance performance measures reflect the 2015 UST regulation, the EPA and the Association of State and Territorial Solid Waste Management Officials coordinated to update existing compliance performance measures and add new measures. The measures required states to switch from tracking compliance against significant operational compliance measures to the more stringent technical compliance rate (TCR) measures. As of March 2025, only 61 percent of USTs were in compliance with all TCR categories (EPA 2025).

## Emergency Planning and Community Right-to-Know Act

In 1986, Congress passed the Superfund Amendments and Reauthorization Act. Title III of this regulation was the "Emergency Planning and community Right-to-Know Act of 1986" (EPCRA). EPCRA was enacted by Congress as the national legislation on community safety. This law helps local communities protect public health, safety, and the environment from chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored onsite to state and local agencies. These reports help communities prepare to respond to chemical spills and similar emergencies.

Section 313 of EPCRA requires manufacturers to report releases to the environment (air, soil, and water) of more than 600 designated toxic chemicals, report offsite transfers of waste for treatment or disposal at separate facilities, develop pollution prevention measures and activities, and participate in chemical recycling. These annual reports are submitted to the EPA and state agencies. EPCRA Sections 301 through 312 are administered by the EPA's Office of Emergency Management. The EPA's Office of Information Analysis and Access implements the EPCRA Section 313 program. In California, SARA Title III is implemented through the California Accidental Release Prevention Program.

The EPA maintains and publishes a database that contains information on toxic chemical releases and other waste management activities by certain industry groups and federal

facilities. This online, publicly available, national digital database is called the Toxics Release Inventory and was expanded by the Pollution Prevention Act of 1990.

Under the EPCRA requirements, local emergency planning committees are responsible for developing a plan for preparing for and responding to a chemical emergency, including

- An identification of local facilities and transportation routes where hazardous materials are present.
- The procedures for immediate response in case of an accident (this must include a community-wide evacuation plan).
- A plan for notifying the community that an incident has occurred.
- The names of response coordinators at local facilities.
- A plan for conducting drills to test the plan.

The emergency plan is reviewed by the State Emergency Response Commission and publicized throughout the community. The local emergency planning committee is required to review, test, and update the plan each year.

## Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires state and local governments to prepare mitigation plans that identify hazards, potential losses, mitigation needs, goals, and strategies. It is intended to facilitate cooperation between state and local governments.

## Toxic Substances Control Act

The Toxic Substances Control Act of 1976 was enacted by Congress to give the EPA the ability to track the 75,000 industrial chemicals currently produced by or imported into the United States. The EPA repeatedly screens these chemicals and can require reporting or testing of any that may pose an environmental or human health hazard. It can ban the manufacture and import of chemicals that pose an unreasonable risk. Also, the EPA has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics. It then can control these chemicals as necessary to protect human health and the environment. The Act supplements other federal statutes, including the Clean Air Act and the Toxics Release Inventory under EPCRA.

## Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act, as amended, is the basic statute regulating hazardous materials transportation in the United States. The purpose of the law is to provide adequate protection against the risks to life and property inherent in transporting hazardous materials in interstate commerce. This law gives the U.S. DOT and other agencies the authority

to issue and enforce rules and regulations governing the safe transportation of hazardous materials.

## Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies and the American Red Cross that: 1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local government overwhelmed by a major disaster or emergency; 2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and 3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a presidential declaration of a major disaster or emergency.

## Business Plan Act

Both the federal government and the State of California require all businesses that handle more than a specified amount of hazardous waste materials or extremely hazardous materials—termed a reporting quantity—to submit a hazardous materials business plan to the local CUPA.

Such a plan must be submitted by businesses that handle hazardous materials or a mixture containing a hazardous material in quantities equal to or greater than:

- 500 pounds of a solid
- 55 gallons of a liquid
- 200 cubic feet of a compressed gas standard temperature and pressure
- The federal Threshold Planning Quantity for Extremely Hazardous Substances
- Radioactive materials in quantities for which an emergency plan is required per Parts 30, 40, or 70 of the CFR, Title 10, Chapter 1

The business plan must include the type and quantity of hazardous materials, a site map, risks of using these materials, spill prevention, emergency response, employee training, and emergency contacts.

## Federal Aviation Agency Advisory Circular 150/5390-2C

FAA Advisory Circular 150/5390-2C provides recommendations for heliport design, including heliports serving helicopters with single and tandem (front and rear) rotors.

## STATE

The primary state agencies that are responsible for overseeing regulations and policies regarding hazardous materials are the California Office of Emergency Services (OES), Cal-EPA, Department of Toxic Substances Control (DTSC), California Department of Transportation (Caltrans), California Highway Patrol (CHP), State Water Quality Control Board, and the California Air Resources Board. Several laws governing the generation, transport, and disposal of hazardous materials are administered by these agencies. State laws and regulations that are applicable to hazards and hazardous materials are presented below.

### California Health and Safety Code and Code of Regulations

The Hazardous Substances Account Act (California Health and Safety Code Sections 25300 et seq.) authorizes the State to clean up hazardous materials release sites—including abandoned sites—not qualifying for cleanup under CERCLA; provides funds to pay for the state's share of costs of CERCLA cleanups; and provides compensation to persons injured by hazardous materials releases.

California Health and Safety Code Chapter 6.95 and California Code of Regulations (CCR), Title 19, Section 2729 describe the minimum requirements for business emergency plans and chemical inventory reporting. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material inventory disclosing hazardous materials stored, used, or handled onsite. A business that uses hazardous materials, or mixtures containing them, in certain quantities must establish and implement a business plan.

CCR Title 8 Section 5191, Occupational Exposure to Hazardous Chemicals in Laboratories, requires that all laboratories have a written chemical hygiene plan as a fundamental chemical safety plan for the laboratory. The chemical hygiene plans are written programs that set forth procedures, equipment, personal protective equipment, and work practices that are capable of protecting employees from the health hazards presented by hazardous chemicals used in laboratories.

### Tanner Act (Assembly Bill 2948)

Although numerous state policies deal with hazardous waste, the most comprehensive is the Tanner Act (Assembly Bill 2948), which was adopted in 1986. The Tanner Act governs the preparation of hazardous waste management plans and the siting of hazardous waste facilities in California. To be in compliance with the Tanner Act, local or regional hazardous waste management plans need to include provisions that define: 1) the planning process for waste management, 2) the permit process for new and expanded facilities, and 3) the appeals process to the state available for certain local decisions.

## California Building Code

The 2025 cycle of the California Building Standards Code (CBC), Title 24, was published on July 1, 2025, and took effect statewide on January 1, 2026. This includes the City of San Bernardino, which adopts the CBC with minor local amendments as part of Title 15 of its Municipal Code. The 2025 CBC is based on the 2024 International Building Code and incorporates changes to address California-specific conditions. Key updates include a complete replacement of the Wildland-Urban Interface requirements in Chapter 7A to better address wildfire risks, revised high-rise building classification to measure height to the highest occupied roof, updated two-way communication system requirements that reference the 2025 NFPA 72, and a new section regulating insulated metal panels. Additional changes clarify rules for podium construction, exterior wall fire-resistance continuity, and exceptions for certain floor penetrations. Energy provisions have been strengthened to promote electrification, expand heat pump use, and improve residential ventilation standards. Starting January 1, 2026, all new construction, remodels, and additions in California—including San Bernardino—must comply with the updated 2025 CBC, with compliance enforced through local plan review, permitting, and inspection processes.

## California Fire Code

The 2025 California Fire Code, effective January 1, 2026, is based on the 2024 International Fire Code with California-specific amendments to address wildfire and urban fire risks. Key changes include stricter wildfire-resistant construction standards for high-risk zones (Class A roofs, fire-resistant siding, dual-pane windows, ember-blocking vents), mandatory advanced fire detection and smart suppression systems, and enhanced evacuation requirements with clearer routes, signage, and lighting. The code also tightens regulations for inspections, contractor responsibilities, and materials testing, aiming to improve resilience, safety, and use of modern technology in fire protection.

## Underground Storage Tank Program

Releases of petroleum and other products from USTs are the leading source of groundwater contamination in the United States. The RCRA Subtitle I establish regulations governing the storage of petroleum products and hazardous substances in USTs and the prevention and cleanup of leaks. In EPA Region 9 (California, Arizona, Hawaii, Nevada, Pacific Islands, and over 140 tribal nations) the UST program operates primarily through state agency programs with EPA oversight. In California, the SWRCB, under the umbrella of CalEPA, provides assistance to local agencies enforcing UST requirements. The purpose of the UST program is to protect public health and safety and the environment from releases of petroleum and other hazardous substances. The program consists of four elements: leak prevention, cleanup, enforcement, and tank tester licensing. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs, including groundwater analytical data, the surveyed locations of monitoring wells, and other data. The SWRCB's

GeoTracker system currently has information submitted by responsible parties for over 10,000 leaking UST (LUST) sites statewide and has been extended to include all SWRCB groundwater cleanup programs, including the LUST, non-LUST (Spill, Leaks, Investigation, and Cleanup), Department of Defense, and landfill programs.

## California Code of Regulations, Title 22, Division 4.5

CCR Title 22, Division 4.5, sets forth the requirements for hazardous-waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting shipments of hazardous waste, including manifesting, vehicle registration, and emergency accidental discharges during transportation.

## Hazardous Materials Disclosure Programs

Both the federal and state governments and the state require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials, termed a reporting quantity, to submit a hazardous materials emergency/contingency plan (also known as a hazardous materials business plan) to their local CUPA (CFR, EPA, SARA, and Title III) (Health and Safety Code, Division 20, Chapter 6.95, §§ 2500-25520; 19 CCR, Chapter 2, Subchapter 3, Article 4, §§ 2729-2734). CalEPA has designated the San Bernardino County Fire Protection District as the CUPA, responsible for managing the following programs in the County (SBCFPD 2025a).

## Hazardous Materials Business Plans

The hazardous materials business plan includes the business owner/operator identification page, hazardous materials inventory chemical description page, and an emergency response plan and training plan. Business plans must include an inventory of the hazardous materials at the facility. The entire hazardous materials business plan needs to be reviewed and recertified every three years. Business plans are required to include emergency response plans and procedures to be used in the event of a significant or threatened significant release of hazardous material. These plans need to identify the procedures to follow for immediate notification to all appropriate agencies and personnel of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. All facilities must keep a copy of their plans onsite.

## Regulations for Hazardous Materials in Structures

Asbestos is regulated as a hazardous air pollutant under the Clean Air Act and as a potential worker safety hazard under the authority of federal OSHA. CalOSHA considers asbestos containing materials (ACM) a hazardous substance when a bulk sample contains more than 0.1 percent asbestos by weight and requires a qualified contractor licensed to handle asbestos. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities could release friable asbestos fibers unless proper precautions are taken. Lead is regulated as a hazardous material, and inorganic lead is regulated as a toxic air contaminant. Lead-containing paints, according to CalOSHA, are defined as paints reported with any detectable levels of lead by paint chip analysis (CCR Title 8, Section 1532.1[d]). When disturbed for construction purposes, these surfaces are subject to CalOSHA exposure assessment requirements. Several regulations and guidelines pertain to abatement of and protection from exposure to ACM and lead-based paint, as follows:

### *Asbestos*

- CCR Title 8, Subchapter 4, Section
- 1529
- CFR Title 29, Section 1926, Subpart Z
- CFR Title 40, Section 61, Subpart M

### *Lead-based paint*

- CCR Title 8, Subchapter 4, Section 1532.1
- CFR Title 29, Section 1926, Subpart D

These rules and regulations provide exposure limits, exposure monitoring, respiratory protection, and good working practice for workers exposed to lead and ACM. In California, ACM and lead-based paint abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. HSC Sections 17920.10 and 105255 require lead to be contained during demolition activities. PCBs were commonly used in the small capacitor in fluorescent light ballasts through 1979. PCB regulations are included in CFR Title 40, Section 761, which requires the material to be incinerated. The entire lighting fixture does not need special handling and disposal as long as the ballast (electrical box) is not leaking. The nonleaking ballasts can be removed and recycled or disposed of properly.

## LOCAL

### City of San Bernardino Local Hazard Mitigation Plan

The City of San Bernardino Local Hazard Mitigation Plan (LHMP) was prepared and adopted in August 2025 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The LHMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the city. In the context of a LHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire (San Bernardino 2024).

The LHMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide.

### Emergency Operations Plan

The Emergency Operations Plan (EOP) for the City of San Bernardino outlines how the City will respond to large-scale emergencies, such as natural disasters, technological incidents, or national security threats. It does not cover routine, day-to-day emergencies. The EOP is a preparedness document meant to be read and practiced before a disaster occurs. It provides a flexible framework that can be applied to various types of emergencies, focusing on both response and short-term recovery. The plan follows the guidelines of the California Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS). These systems help coordinate efforts across multiple agencies and jurisdictions during major incidents. Each part of the City's emergency management organization is responsible for maintaining current Standard Operating Procedures (SOPs) and Emergency Operating Procedures (EOPs)to ensure effective response actions, including emergency powers for key officials (San Bernardino 2015).

### City of San Bernardino General Plan

The 2005 General Plan's Safety Element includes several goals and policies that address addresses geological and seismic, hazardous materials, wind and fire, aviation, and flooding issues in the City of San Bernardino. The City's goals and policies for hazardous materials and uses are designed to ensure the protection of the public health, safety, and welfare, and environmental resources in the City. Planning practices emphasize waste reduction, recycling, proper management of hazardous materials, siting of facilities, and effective emergency response (San Bernardino 2005).

### City of San Bernardino Municipal Code

The following sections of the San Bernardino Municipal Code (SBMC) relate to hazards and hazardous materials:

- **Chapter 17.05, Hazardous Waste Management Plan.** This chapter establishes the local land use regulations governing the siting and permitting of hazardous waste facilities within the jurisdiction of the city. Its primary purpose is to ensure that such facilities are planned, reviewed, and approved in a way that protects public health, safety, and the environment, while also aligning with countywide and state-level hazardous waste management policies.
- **Chapter 8.19, Abatement of Fire Hazards and Hazardous Trees.** This chapter provides the legal framework for identifying, enforcing, and removing fire hazards and hazardous trees within the City of San Bernardino. It aims to reduce the risk of wildfires and other public safety threats by regulating the growth of weeds, vegetation, and dangerous trees on private and public property.
- **Section 15.04.020, Adoption of Codes.** The City of San Bernardino adopts the 2025 California Fire Code (Title 24, Part 9) as part of its building standards.

### City of San Bernardino Development Code

The following sections of the existing Development Code relate to airport hazards:

- **Chapter 19.12-A, A (Airport) Zone.** This chapter establishes the regulations for the Airport (A) Zone, which is designed to accommodate the operational and land use needs of the international airport. The purpose of this zone is to support the conversion, reuse, and expansion of existing airfield facilities into a fully functioning air carrier airport. It aims to ensure compatibility with adjacent land uses while promoting airport-related development that generates employment opportunities and serves regional users. The chapter outlines permitted, conditionally permitted, and development-permitted uses, along with specific development standards and general provisions applicable to airport-related activities. Additionally, it includes airport development design guidelines to promote orderly, functional, and compatible growth.
- **Chapter 19.12 A (Airport Overlay) Districts**. The purpose of this chapter is to promote the public health, safety and general welfare in the vicinity of airports by minimizing exposure to crash hazards and high noise levels generated by airport operations and to encourage future development that is compatible with the continued operation of airports.

## 3.9.2 Existing Conditions

The following existing conditions information describes the setting of both the citywide area and DTSP Area with respect to hazards and hazardous materials.

## HAZARDOUS MATERIALS

Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or implementing agency has a reasonable basis for believing would be injurious to public health and safety or harmful to the environment if released into the workplace or the environment. Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been discarded, discharged, spilled, or contaminated or are being stored until they can be disposed of properly (22 CCR Chapter 11, Article 2, Section 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific CCR Title 22 criteria.

Past industrial or commercial activities on a site could have resulted in spills or leaks of hazardous materials to the ground, resulting in soul and/or groundwater contamination. Hazardous materials may also be present in building materials of older structures and released during building demolition activities. If improperly handled, hazardous materials and wastes can cause public health hazards when released to the soil, groundwater, or air. The four basic exposure pathways through which an individual can be exposed to a chemical agent include inhalation, ingestion, bodily contact, and injection. Exposure can come as a result of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials or waste from previous spills or leaks.

## HAZARDOUS WASTE GENERATORS

The EPA regulates generators of hazardous waste based on the amount of waste generated. Large quantity generators produce 1,000 kilograms or more per month, or more than one kilogram per month of acutely hazardous waste. Small quantity generators produce between 100 and 1,000 kilograms of hazardous waste per month.

## HAZARDOUS MATERIALS SITES

A search of the online EnviroStor and GeoTracker databases on October 6, 2025, identified 25 active/open hazardous materials sites within the City of San Bernardino, as shown in Table 3.9-1, *Hazardous Sites in the City of San Bernardino*.

All other sites that are not identified as having an active or open status including closed, inactive, and/or no further action required are listed in Appendix E of this DEIR.

### Table 3.9-1 Hazardous Sites in the City of San Bernardino

| Site | Address | Type | Status |
|---|---|---|---|
| **EnviroStor** | | | |
| 1975 Diers Court | 1975 Diners Court | Voluntary Cleanup | Active |
| 1x West Highland Cleaners | 431 West Highland Avenue | Evaluation | Active |
| ABC Drive-In Cleaners | 905 N Sierra Way | State Response | Active |
| Bell Cleaners | 631 N. Mt Vernon Avenue | Evaluation | Active |
| BTC III Etiwanda Commerce Center LP | 8998 Etiwanda Avenue | Corrective Action | Active |
| Edrick Inc | 357 South Arrowhead | Evaluation | Active |
| Family Dry Cleaners, Inc. | 663 West 2nd. St. | State Response | Active |
| Former Ramona Elementary School Site | 1524 West 7th Street | Voluntary Cleanup | Active |
| Lords Dry Cleaners | 1061 W 5th St | Evaluation | Active |
| Lotz Quality Drapery Cleaners | 1269 N D St | State Response | Active |
| Newmark Groundwater Contamination | Bunker Hill Ground Water Basin | Federal Superfund - Listed | Active - Land Use Restrictions |
| Norton Air Force Base | 2,208 Acres;58 Mi Ea Of Los Angeles, Ca | Federal Superfund - Listed | Active - Land Use Restrictions |
| Pauls Cleaners | 1268 No E St | Evaluation | Active |
| Sce - Valencia | Southwest Corner Of 40th And Genevieve Street | Voluntary Cleanup | Active |

### Table 3.9-1 Hazardous Sites in the City of San Bernardino

| Site | Address | Type | Status |
|---|---|---|---|
| Terminix | 440 S. Sierra Way | Voluntary Cleanup | Active |
| **Geotracker** | | | |
| 17164 Cajon Property | 17164 Cajon Blvd | Lust Cleanup Site | Open - Site Assessment |
| Camp Ono Plume (Tce, Pce Contamination Study) | | Cleanup Program Site | Open - Remediation |
| Eric Realty Property, Former Aboveground Solvent Storage Tank | 495 Commercial Road East | Cleanup Program Site | Open - Assessment & Interim Remedial Action |
| Former Montgomery Wards Service Center At Carousel Mall Shopping Center | 144 Central City Mall | Lust Cleanup Site | Open - Site Assessment |
| Lytle Creek North Wwtp | 18100 Institution Road | * Wdr Site | Active - Wdr |
| Margaret H Chandler Wwrf | 399 Chandler Place | * Npdes | Active |
| Norton Afb Subsurf.,Ponds,Etc. | | Land Disposal Site | Open |
| Pennsylvania Street Inert Landfill | 1955 West 9th Street | Land Disposal Site | Open - Active |
| San Bernardino Cnty Lamp | 385 North Arrowhead Avenue | * Wdr Site | Active - Wdr |
| Sterling Natural Resource Center Wwtf | 25376 5th Street | * Wdr Site | Active - Wdr |

Sources: EnviroStor 2025; GeoTracker 2025.

## SCHOOLS

Some land uses are considered more sensitive to airborne hazardous materials than others due to the types of population groups or activities involved. Because sensitive population groups include children, the California Environmental Quality Act (CEQA) requires an evaluation of hazardous emissions or handling hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school, private or public.

There are currently 74 existing schools in the City of San Bernardino, including three other schools (SBCUSD 2025). There are two schools within the DTSP – Jones Elementary School and Norton Elementary School.

## AIRPORTS

Airport operations and their accompanying safety hazards require careful land use planning on adjacent and nearby lands to protect the residential and business communities from the potential hazards that could be created by airport operations.

The San Bernardino International Airport is located within the city limits, specifically on the south side of San Bernardino. The terminal address is 105 N. Leland Norton Way San Bernardino. It serves as a public airport, primarily for general aviation and cargo operations, but also offers passenger service. The DTSP Area is approximately two miles west of the airport.

## WILDFIRE

As shown in Figure 3.20-1, *Very High Fire Hazard Severity Zones*, in Section 3.20, *Wildfire*, the City is designated Very High, High, and Moderate FHSZs in several locations for both the LRA and SRA. Specifically, the Very High FHSZs are in the northern areas of the city where the valley meets the San Bernardino National Forest, including areas along Interstate (I) 215, State Route (SR) 18, and SR-330.

## EVACUATION ROUTES

Figure 3.20-4, *Evacuation Routes*, shows the evacuation routes throughout the City including the I-215, I-10, SR-210, and SR-66. All evacuation routes face potential disruption that may block or damage roadways, or collapse overpasses. Figure 3.20-5, *Evacuation-Constrained Residential Parcels*, shows parcels that have only one evacuation route. These evacuation constrained areas include parcels in northern San Bernardino which may be subject to wildfires and landslides, and parcels in the southern and western areas of the City which could be subject to flooding. The lack of emergency access points may create difficulties if there is a need to evacuate.

## 3.9.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning hazardous resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning hazardous resources if it would:

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

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

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

d) Be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would 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, if the project would 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.

### METHODOLOGY

The SWRCB GeoTracker database and the DTSC EnviroStor database were searched to identify hazardous materials and buildings in San Bernardino. 25 active/open hazardous materials sites within the city were identified.

## 3.9.4 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

#### Construction

Potentially hazardous materials used during construction include substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel. There is potential for these materials to spill or to create hazardous conditions. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term or one time in nature. In the event of a potential release and cleanup of a hazardous material in the construction process, the San Bernardino County Fire Department's Hazardous Materials Division, is responsible for oversight of hazardous material cleanup, investigations, permitting, and compliance at local contaminated sites related to construction and other industrial activity (SBCFPD 2025a). This includes oversight of environmental investigations and cleanup of contaminated sites where hazardous material releases have occurred.

To prevent hazardous conditions, existing local, state, and federal laws are to be enforced at construction sites, as well as during the transport and disposal of hazardous materials. For example, compliance with existing regulations would ensure that construction workers and the public are not exposed to any risks related to hazardous materials during construction activities. Cal/OSHA has regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the San Bernardino County Fire Department's Hazardous Materials Division would be required throughout the duration of project construction. Therefore, impacts would be **less than significant.**

#### Operations

The General Plan Update would allow for the development of a variety of land uses, including industrial, residential, commercial, office, civic, and open space uses. Industrial uses and some commercial uses utilize greater amounts of hazardous materials than other uses, such as

residential uses and schools. Operation of future residential and some commercial uses that would be accommodated would involve the use of small quantities of hazardous materials for cleaning and maintenance purposes, such as paints, household cleaners, fertilizers, and pesticides. Operation of future industrial and some types of commercial uses would involve use of larger amounts of hazardous materials, such as fuel/diesel, and commercial grade chemicals, solvents, cleaners, etc. These types of industrial and commercial uses, and therefore, specific types of hazardous materials to be used, are not yet known.

The use, storage, transport, and disposal of hazardous materials by future residents and commercial and industrial tenants/owners would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, and the San Bernardino County Fire Department's Hazardous Materials Division. Regulations that would apply to the uses that involve transporting, using, or disposing of hazardous materials include RCRA, which provides the "cradle to grave" regulation of hazardous wastes; CERCLA, which regulates closed and abandoned hazardous waste sites; the Hazardous Materials Transportation Act, which governs hazardous materials transportation on U.S. roadways; International Fire Code (IFC), which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials; CCR Title 22, which regulates the generation, transportation, treatment, storage and disposal of hazardous waste; and CCR Title 27, which regulates the treatment, storage, and disposal of solid wastes. For development in California, Government Code Section 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Sections 25500 through 25520. Chapter 17.05, Hazardous Waste Management Plan, of the SBMC, sets forth local land use regulations for the siting and permitting of hazardous waste facilities, ensuring their development protects public health, safety, and the environment while aligning with county and state hazardous waste policies.

Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Additionally, future residential and nonresidential uses under the proposed project would be constructed and operated with strict adherence to all emergency response plan requirements set forth by the San Bernardino County Fire Department's Hazardous Materials Division.

CalEPA has designated the San Bernardino County Fire Protection District as the CUPA, responsible for managing the following programs in the County (SBCFPD 2025a):

- Hazardous Materials Business Plan
- Hazardous Waste & Onsite Treatment

- Aboveground Petroleum Storage Act
- Underground Storage Tank (UST) Program
- California Accidental Release Program (CalARP)
- CA Fire Code – HMMP & HMIS

Additionally, Table 3.9-2, *Hazardous Materials: General Plan Update Policies,* show all the policies that would minimize risks from hazardous materials. Therefore, impacts would be **less than significant.**

### Table 3.9-2 Hazardous Materials: General Plan Update Policies

| **Safety Element** | |
|---|---|
| S-2.1 | **Household hazardous waste education program.** Work with San Bernardino County Fire Protection District to educate the community about proper storage, use, handling, and disposal of household hazardous wastes. |
| S-2.2 | **Household hazardous waste program coordination.** Coordinate with the San Bernardino County Fire Protection District to manage the collection, transport, and disposal of household hazardous waste. |
| S-2.3* | **Hazardous materials plan.** Require business owners to prepare, submit, and update business plans submitted to the San Bernardino County Fire Protection District with measures necessary to minimize hazardous materials accidents due to natural disaster(s). |
| S-2.4 | **Hazardous material spill response.** Coordinate with appropriate federal, regional and state environmental, resource agencies, San Bernardino County Fire Protection District, and surrounding cities to ensure effective response to hazardous materials spills. |
| S-2.5* | **Hazardous material facility siting.** Prohibit new facilities that use, store, manufacture, transport, or dispose of hazardous materials adjacent to or near schools, residential areas, or other sensitive land uses. |
| S-2.6 | **Hazardous material and waste handling.** Work with federal, state, and other agencies to ensure enforcement of regulations for proper handling, treatment, transport, and disposal of hazardous materials and waste. |
| S-2.7 | **Hazardous material transportation routes.** Avoid, to the maximum extent feasible, hazardous materials transportation routes on roads with a high concentration of people or sensitive facilities, such as downtown, housing, schools, parks, and public services locations |

* Denotes mitigating policies

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

### Construction

As discussed above, potentially hazardous materials used during construction within the DTSP area would include substances such as paints, sealants, solvents, adhesives, cleaners, and diesel fuel. There is potential for these materials to spill or to create hazardous conditions. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term or one time in nature. all contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the San Bernardino County Fire Department's Hazardous Materials Division would be required throughout the duration of project construction. Therefore, impacts would be **less than significant.**

### Operations

The DTSP would allow for the development of a variety of land uses, including industrial, residential, commercial, office, civic, and open space uses. Industrial uses and some commercial uses utilize greater amounts of hazardous materials than other uses, such as residential uses and schools. Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. Additionally, future residential and nonresidential uses under the proposed project would be constructed and operated with strict adherence to all emergency response plan requirements set forth by the San Bernardino County Fire Department's Hazardous Materials Division.

Additionally, Table 3.9-2 shows all the policies under the General Plan Update that would minimize risks from hazardous materials, which would also be applicable in the DTSP Area. Therefore, impacts would be **less than significant.**

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The use, storage, and transport of hazardous materials and hazardous wastes in compliance with the laws and regulations mentioned above would minimize the potential for releases of

hazardous materials that could pose substantial hazards to the public or the environment and would entail prompt containment and cleanup of spills.

Development and redevelopment under the General Plan could involve demolition or renovation of older structures that may contain hazardous building materials such as ACMs and lead-based paint (LBP). Disturbance of these materials during construction activities could result in localized releases if not properly managed. However, federal and state regulations, including those enforced by the EPA, OSHA, and applicable state agencies, require pre-construction surveys, proper abatement, and disposal of ACMs and LBP by licensed professionals. Adherence to these requirements would minimize the potential for exposure to construction workers and the public.

Residential uses, some civic uses such as schools and parks, and some commercial uses utilize only small amounts of hazardous materials—such as cleansers, paints, fertilizers, and pesticides—and mostly or entirely for cleaning and maintenance purposes. Use of such small amounts of hazardous materials would not pose substantial hazards to the public or the environment through accidental releases. Businesses handling reporting quantities of hazardous or extremely hazardous materials would maintain business plans including: procedures in the event of a hazardous materials release, procedures for immediate notification of all appropriate agencies and personnel, identification of local emergency medical assistance, contact information for company emergency coordinators, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel.

CalARP aims to reduce risks of regulated substances involving regulated substances through the evaluation of hazards and consequences and the development of Risk Management Plans (RMPs) and Prevention Programs. A Risk Management Plan requires offsite consequence analysis, evaluation of process hazards, and implementation of an accidental release prevention program. Stationary sources are required to coordinate the development and documentation of the prevention program with the CUPA.

The most common regulated substances found in San Bernardino County that require a RMP are chlorine, nitric acid, ammonium hydroxide, and anhydrous ammonia. Risk Management Plan Content includes safety information, a hazard review, operating procedures, training requirements, maintenance requirements, compliance audits, and incident investigation procedures (SBCFPD 2025b). The San Bernardino County Fire Protection District is the CUPA designated as the administering agency for CalARP and would oversee ensuring these procedures are followed. Additionally, Table 3.9-2 shows all the policies that would minimize risks from hazardous materials. Therefore, impacts would be **less than significant.**

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As discussed above, the use, storage, and transport of hazardous materials and hazardous wastes in compliance with the laws and regulations mentioned above would minimize the potential for releases of hazardous materials that could pose substantial hazards to the public or the environment and would entail prompt containment and cleanup of spills. Additionally, Table 3.9-2 shows all the policies that would minimize risks from hazardous materials. Therefore, impacts would be **less than significant.**

**Significance without Mitigation:** Less than significant.

**c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

There are currently 74 existing schools in the City, including three other schools (SBCUSD 2025). The project would not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste in a manner that would pose a significant risk to schools. Typical land uses anticipated under the General Plan Update, such as residential, civic (including schools and parks), and most commercial developments, would involve only small quantities of common hazardous materials (e.g., cleaning products, paints, fertilizers, and pesticides), used primarily for maintenance purposes. These materials are not expected to pose substantial hazards through accidental release.

For businesses that handle reportable quantities of hazardous or extremely hazardous materials, compliance with local, state, and federal regulations, such as the CalARP Program, would be required. These regulations mandate detailed risk management plans, emergency procedures, and employee training programs to prevent and respond to potential hazardous material releases. The San Bernardino County Fire Protection District, as the CUPA, oversees implementation and compliance with these requirements.

In addition, Policy S-2.5 of the proposed General Plan Update specifically prohibits new facilities that use, store, manufacture, transport, or dispose of hazardous materials adjacent to or near schools. This policy, along with other policies in Table 3.9-2, further ensures that school sites are protected from hazardous material risks. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

There are two schools within the DTSP, Jones Elementary School and Norton Elementary School. The DTSP would not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste in a manner that would pose a significant risk to schools. Typical land uses anticipated under the General Plan Update, such as residential, civic (including schools and parks), and most commercial developments, would involve only small quantities of common hazardous materials (e.g., cleaning products, paints, fertilizers, and pesticides), used primarily for maintenance purposes. These materials are not expected to pose substantial hazards through accidental release.

For businesses that handle reportable quantities of hazardous or extremely hazardous materials, compliance with local, state, and federal regulations, such as the CalARP Program, would be required. These regulations mandate detailed risk management plans, emergency procedures, and employee training programs to prevent and respond to potential hazardous material releases. The San Bernardino County Fire Protection District, as the CUPA, oversees implementation and compliance with these requirements.

In addition, Policy S-2.5 of the proposed General Plan Update specifically prohibits new facilities that use, store, manufacture, transport, or dispose of hazardous materials adjacent to or near schools. This policy, along with other policies in Table 3.9-2, further ensures that school sites are protected from hazardous material risks. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**d) Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As identified in Table 3.9-1, a search of the online EnviroStor and GeoTracker databases on October 6, 2025, identified 25 active/open hazardous materials sites within the City (SWRCB 2025; DTSC 2025). Development on other sites in the City may result in hazardous materials impacts. However, properties contaminated by hazardous substances are regulated at the local, state, and federal level and are subject to compliance with stringent laws and regulations for investigations and remediation. For example, compliance with the CERCLA, RCRA, CCR Title 22, and related requirements would remedy all potential impacts caused by hazardous substance contamination. Additionally, there are several policies in the proposed General Plan Update Table 3.9-2 that would ensure impacts as a result of hazardous materials would be reduced. Therefore, buildout of the Proposed General Plan Update and DTSP would result in a less than

significant impact upon compliance with existing laws and regulations. This impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Development with the DTSP area may result in hazardous materials impacts. However, properties contaminated by hazardous substances are regulated at the local, state, and federal level and are subject to compliance with stringent laws and regulations for investigations and remediation. For example, compliance with the CERCLA, RCRA, CCR Title 22, and related requirements would remedy all potential impacts caused by hazardous substance contamination. Additionally, there are several policies in the proposed General Plan Update Table 3.9-2 that would ensure impacts as a result of hazardous materials would be reduced. Therefore, buildout of the Proposed General Plan Update and DTSP would result in a less than significant impact upon compliance with existing laws and regulations. This impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**e) For a project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The San Bernardino International Airport is located in the southeastern portion of the City. Although a recently adopted Airport Land Use Compatibility Plan (ALUCP) does not appear to be in place, airport-related land use and noise compatibility issues are addressed through the City's Development Code.

Chapter 19.24 of the Development Code Update (Airport Overlay Districts) establishes use restrictions, development standards, and noise attenuation requirements for properties within proximity to the airport. These regulations prohibit labor-intensive uses and residential dwellings within designated Airport Districts (AD I and AD II). In addition, they limit uses that could interfere with airport operations, such as those generating glare, smoke, or other hazards, and require a minimum 30-decibel Noise Level Reduction (NLR) for public-facing structures in AD III.

The General Plan Update supports and builds upon these existing regulations by guiding land use in a way that maintains compatibility with airport operations. Although the General Plan

Update proposes land use changes in some areas of the city, these changes have been carefully evaluated and would not introduce uses that are incompatible with airport functions or safety requirements. As shown in Table 3.9-3, *Airports: Proposed General Plan Update Policies*, lists the proposed General Plan Update policies related to airports issues.

In accordance with Public Resources Code Section 21096, the City, as lead agency, has considered potential hazards and noise impacts related to the airport. Based on the protective framework of the Development Code Update and the proposed General Plan Update, the project would not result in safety hazards or excessive noise exposure for people living or working in the General Plan Update Area. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**Table 3.9-3 Airports: Proposed General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-18.1 | **Priority land uses.** Support projects on adjoining lands that are related to, support operations of, and facilitate access with the SBIA. Development proposals must be consistent with the SBIA Land Use Plan, Alliance California Specific Plan, and Airport Overlay District. |
| LU-18.2* | **Development standards.** Limit the type of development, population density, site coverage, and height of structures as specified in the applicable safety zones in the Comprehensive Land Use Plan for the SBIA and the Airport Overlay District of the Municipal Code. |
| LU-18.3 | **Connections and access.** Continue to support buildout of the internal and adjacent street network surrounding the airport in accordance with City street design specifications and the classifications in the Alliance California Specific Plan. |
| LU-18.4* | **Safety and noise.** Prohibit sensitive land uses on the airport property and within surrounding applicable areas, as noted in the Airport Overlay District, that cannot achieve the noise reduction, safety, or development standards of the Airport Overlay District. |

* Denotes mitigating policies

## DOWNTOWN SPECIFIC PLAN

The nearest airport to the DTSP Area is San Bernardino International Airport, located approximately 4.8 miles southeast. As there is currently no ALUCP, the City relies on the San Bernardino Development Code, specifically the Airport Overlay Zones established in Chapter 19.24, to guide land use compatibility around the airport. The DTSP Area is not located within an airport overlay zone, nor is it within the airport's designated influence area. Therefore, implementation of the DTSP would not result in safety hazards related to airport operations. Therefore and no impact would occur.

**Significance without Mitigation:** No impact.

**f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

I-215 is the major east-west divider, while SR-210 is the major north-south divider. I-10 is in the southern part of the city. Other major highways include State Route 206 Kendall Drive and E Street); SR-66 (which includes the former U.S. 66); SR-18 (from SR-210 north on Waterman Avenue to the northern City limits into the mountain communities), 210 and I- 215

Several major roadways and transit routes within and adjacent to the City are crossed by one or more disaster prone areas—including Alquist Priolo zones, Very High FHSZ, 100-year flood zones, dam inundation zones, and other hazards (see , Figure 3.10-2, *Citywide Flood Zones,* Figure 3.10-3, *Citywide Dam Inundation Areas*, Figure 3.20-1, *Fire Hazard Severity Zones*, and Figure 3.20-2, *Wildland-Urban Interface*). Any of these disasters can cause damage to transportation infrastructure, preventing or impeding access by emergency responders and evacuation by residents.

As indicated in Chapter 2.46, Disaster Council, of the SBMC, the San Bernardino Disaster Council is responsible for the development of the City's emergency plan, which shall provide the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency. Furthermore, the City of San Bernardino is covered under its LHMP and EOP which provide strategies to address emergencies in the City (San Bernardino 2015; 2024).

To ensure the effectiveness of emergency planning and hazard mitigation, the local and regional fire department works with an array of community partners. These include utility service providers (water, power, and sanitation), schools, community organizations, residents, and other local entities. Mutual and automatic aid agreements are also maintained with numerous surrounding local, state, and federal agencies to allow for appropriate backup services in case of an emergency, disaster, or other similar event (San Bernardino 2025).

The City of San Bernardino has also implemented Government Code Section 65302 which requires that the safety element of a general plan address evacuation route. The CAL FIRE safety element checklist also requires cities to address evacuation routes. During an emergency, CAL FIRE, San Bernardino County Fire Department would provide emergency services within the City. Future development under the proposed project would be required to comply with applicable fire and building codes to meet minimum standards for fire safety. In addition, Table 3.9-4, *Emergency Plan: Proposed General Plan Update Policies,* show all the policies that would minimize impacts related physically interfering with an adopted emergency response plan or emergency evacuation plan. Therefore, compliance with applicable regulations, and

implementation of emergency and evacuation plans as well as the policies in the Proposed General Plan Update would reduce impacts to **less than significant**.

**Significance without Mitigation:** Less than significant.

### Table 3.9-4 Emergency Plan: Proposed General Plan Update Policies

| | |
|---|---|
| **Safety Element** | |
| S-1.1 | **Emergency operations plan.** Maintain a functional City Emergency Operations Plan that addresses all hazards, including climate change hazards and lays out a plan for how to respond to each hazard in an effective manner. |
| S-1.2 | **Local hazard mitigation plan incorporation.** Incorporate the most recent version of the City of San Bernardino Local Hazard Mitigation Plan, certified by FEMA, into this Safety Element by reference, as permitted by California Government Code 65302.6. |
| S-1.3 | **Hazard and evacuation route awareness.** Promote hazard preparedness and awareness of evacuation routes to all residents, ensuring resources are available in multiple languages and formats for people with different or limited access and functional needs. |
| S-1.4 | **Mutual aid agreements.** Maintain and expand, where needed, mutual aid agreements with neighboring cities and the County of San Bernardino and develop partnerships with other emergency relief organizations. |
| S-1.5 | **Access to critical facilities.** Ensure that critical, high-occupancy, and essential facilities have adequate access for emergency personnel to access the facility in the event of an emergency or disaster. |
| S-1.6 | **Post-disaster redevelopment.** Require that buildings, structures, and infrastructure redeveloped after a disaster meet current local, state, and federal code requirements to reduce future vulnerabilities to hazards. |
| S-1.7 | **critical and essential facilities siting.** Locate new critical and essential facilities outside of Fire Hazard Severity Zones floodplains, AP Zones, and moderate-high landslide areas—to ensure operability during disasters. |
| S-1.8 | **Interjurisdictional coordination.** Coordinate with San Bernardino County, neighboring local governments, state and federal agencies, and non-governmental partners as well to effectively prepare for and respond to multiple natural and human-caused disasters. |
| S-1.9 | **Community emergency response team.** Expand the capabilities of the City's Community Emergency Response Team to provide more community members with the information and tools to respond to disasters and emergency situations. |
| S-1.10 | **Adequate police and fire services.** Require new development to have adequate police and fire protection services that are sufficient to keep the community safe, respond to emergencies in a timely manner, and allow for timely evacuation prior to project approval. |
| S-1.11 | **Evacuation access.** Require new development in a Fire Hazard Severity Zone as shown in the most current CAL FIRE map, to identify at least two points of access for day-to-day access and evacuation purposes and make improvements to ensure adequate capacity of routes. |

**Table 3.9-4 Emergency Plan: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-1.12 | **Emergency evacuation routes.** Ensure emergency evacuation routes are built and maintained to remain open during and after disasters. Reassess evacuation routes and develop a multi-hazard evacuation plan to ensure routes are functional. |
| S-1.13 | **Evacuation constrained parcels.** Explore secondary means of ingress and egress in areas with evacuation constraints, as shown in **Figure S-3**, Evacuation Constrained Residential Parcels, for existing subdivisions or developments of 10 units or more. |

* Denotes mitigating policies

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.20-4, potential evacuation routes for the DTSP include 5th Street, E Street, Rialto Avenue, and a portion of 2nd Street. Figure 3.20-5 shows that there is no residential parcel with evacuation constraints within the DTSP area.

Construction activity could temporarily block existing roadways or require diversions to avoid construction activity. Since it is unknown at this time where or if temporary blockages or diversions will be needed, the city relies on its development review process to consider future requests. Road closures and detours can affect the ability of emergency personnel to respond.

Temporary road closures and detours must be approved before any construction can occur by the Department of Public Works. In the City of San Bernardino, any project requiring lane or road closures during construction must coordinate closely with the City's Public Works Department, Engineering Division, which oversees right-of-way activities and issues Road Closure / Right-of-Way (ROW) Permits. Applicants are required to submit a completed ROW permit application, a detailed Traffic Control Plan, and proposed closure duration for review and approval (San Bernardino 2014; 2025). Depending on project scope and location, additional coordination is required with the Fire Department to ensure emergency access, and with the Police Department for traffic enforcement and public safety. As the proposed project will not permanently change any evacuation route identified in Figure 3.20-4, and existing development procedures ensure that limited access or detours are approved by the Public Works Department and emergency services during construction the proposed project would not impair implementation of or physically interfere with the City of San Bernardino emergency response or evacuation plans. Project-related impacts would be less than significant.

The San Bernardino County Hazards Element includes Policy HZ-2.4 which designate truck routes for the transportation of hazardous materials through unincorporated areas and prohibit routes that pass through residential neighborhoods to the maximum extent feasible. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The City of San Bernardino's geography, climate, and vegetation contribute to conditions that support recurring wildfire activity. The northern portions of the city, where the valley meets the San Bernardino National Forest near I-215, SR-18, and SR-330, are designated as Very High FHSZs as shown in Figure 3.20-1. As shown in Figure 3.20-1, these same areas also overlap with the Wildland Urban Interface (WUI), where developed land is adjacent to or interspersed with wildland vegetation.

Any development occurring under the proposed project would be required to incorporate applicable components of the EOP and LHMP to support evacuation procedures for residents and workers in wildfire-prone areas. Development within WUI areas or Very High FHSZs would be required to comply with the Very High FHSZ Fire Safe Regulations, the California Building Standards Code, the California Fire Code, and the SBMC, which establish standards for roadway access, maximum lengths of single-access roads, minimum roadway widths, and vegetation management. Compliance with applicable fire safety and access regulations would ensure that the General Plan Update would not significantly expose people or structures to significant risk, loss, injury, or death from wildfires.

Table 3.9-5, *Wildfire Risk: Proposed General Plan Update Policies,* shows all the policies that would minimize impacts related to the General Plan Update resulting in potential impact to people and structures from wildfires. Policies S-6.4 and S-6.7 require residential development in these areas to provide adequate water infrastructure, fire-resistant landscaping and fuel breaks, multiple access points for daily use and evacuation, and clearly marked streets and home numbers. Policy S-6.5 requires that new development in the Very High FHSZ prepare a fire safety plan approved by the San Bernardino County Fire Protection District.

## Table 3.9-5 Wildfire Risk: Proposed General Plan Update Policies

| | |
|---|---|
| **Safety Element** | |
| S-6.1 | **Coordination with USFS.** Work with the U.S. Forest Service and private landowners to ensure that sites are developed, buildings are constructed, and that vegetation and natural areas are appropriately managed to minimize the risk of wildfire in the foothills. |
| S-6.2* | **Local code compliance.** Require that development in the Very High Fire Hazard Severity Zone shown on **Figure S-12**, is subject to provisions of the Hillside Management Overlay District and the Foothill Fire Zones Overlay in addition to State regulations. |
| S-6.3* | **Fire retardant roofing.** Continue to require that all new construction projects as well as rehabilitation projects that include the replacement of roofs of existing structures use fire retardant materials. (LU-1 and S-3) |
| S-6.4* | **Residential development in Very High Fire Hazard Severity Zones.** Avoid new residential development in Very High Fire Hazard Severity Zones. Where infeasible, residential development shall:<br>▪ Adhere to the California Building Code, California Fire Code, and Fire Safe Standards requirements.<br>▪ Provide adequate water conveyance infrastructure to meet daily and fire-flow requirements.<br>▪ Install fire-resistant native landscaping and fuel breaks, which shall be required in residential areas.<br>▪ Identify at least two points of access for day-to-day and evacuation purposes, make improvements, and maintain routes to ensure adequate capacity.<br>▪ Install visible home numbering and street signs that identify evacuation routes. |
| S-6.5* | **Fire safety plans.** Require new development in the Very High Fire Hazard Severity Zones to have a fire safety plan, in consultation with and approval by San Bernardino County Fire Protection District, prior to the issuance of building permits. |
| S-6.6* | **Fire safe regulations.** Require property owners of development in Local Responsibility Area shown on **Figure S-12**, to comply with building, defensible space, and fuel break standards in the Public Resources Code (PRC 4291) and Very High Fire Hazard Severity Zone Fire Safe Regulations. |
| S-6.7 | **Building code compliance.** Adopt and enforce the most recent version of the California Building Code and Fire Code, including local amendments, as well as the California Very High Fire Hazard Severity Zone Regulations for new and existing development. |
| S-6.8 | **Fire hazard reduction projects.** Continue to work with the San Bernardino County Fire Protection District to implement fire hazard reduction policies and projects, in accordance with the City's Local Hazard Mitigation Plan, the General Plan, and the Capital Improvement Program. |
| S-6.9 | **Brush removal and weed abatement.** Support brush removal and weed abatement in developed areas within the City to minimize fire risk, and coordinate with the San Bernardino County Fire Protection District, CAL FIRE, and the U.S. Forest Service for brush removal in areas outside of City limits. |

### Table 3.9-5 Wildfire Risk: Proposed General Plan Update Policies

| | |
|---|---|
| **Safety Element** | |
| S-6.10* | **Fuel modification zones.** Developers of property on or abutting hillsides shall implement, with consultation and approval from the Bernardino County Fire Protection District, a fuel-modification zone, between natural open space and planned development to lessen the fire hazard potential in interface areas. |
| S-6.11 | **CALFIRE unit fire plan.** The current version of the San Bernardino CAL FIRE Unit Fire Plan is hereby incorporated into this Safety Element, by reference, to ensure that non-conforming development reduces fire hazards by implementing Very High Fire Hazard Severity Zone Fire Safe Regulations for roads and vegetation. |
| S-6.12 | **Fire suppression water supply.** Ensure that public and private water distribution and supply facilities have adequate capacity and reliability to supply both daily and emergency firefighting needs consistent with the standards and requirements promulgated by the San Bernardino County Fire Protection District. |
| S-6.13 | **Water supply and infrastructure for wildfire.** Ensure that existing and future development within the City has sufficient water supplies, appropriate water delivery infrastructure, and appropriate water pressure nearby for fire-fighting purposes consistent with the standards and requirements promulgated by the San Bernardino County Fire Protection District. |
| S-6.14 | **Fire hazard public education.** Work with the San Bernardino County Fire Protection District to conduct public education, in languages and formats appropriate for people with different access, lingual, and functional needs, to inform the community of fire hazards and measures to minimize damage caused by fires. |
| S-6.15* | **Post-fire redevelopment.** Require redevelopment after wildfires to meet current California Building Code and Fire Code and California Very High Fire Hazard Severity Zone Fire Safe Regulation to reduce future vulnerabilities through site preparation, layout design, fire-resistant landscaping, and fire-retarding design and materials. |
| S-6.16 | **Post fire slope stabilization.** Coordinate with local, state, and federal agencies as appropriate to stabilize burned slopes after a wildfire to prevent debris flows during winter months and to encourage the regrowth of native plants that help (re)stabilize burned slopes. |

* Denotes mitigating policies

Note: Figures referenced in these policies refer to figures in the proposed Safety Element.

Implementation of the proposed General Plan Update would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.20-1 and Figure 3.20-2, the DTSP area is not mapped within a Very High FHSZ nor are the plan boundaries in proximity WUI. The DTSP area is highly urbanized and contains no large open space areas or excessive combustible vegetation to create the potential for wildfire fire hazards. Therefore, implementation of the DTSP area would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.9.5 Cumulative Impact Analysis

The geographic area for cumulative analysis includes the City of San Bernardino and surrounding areas where ongoing or planned development could involve the use, transport, storage, or disposal of hazardous materials, exposure to wildland fire, or potential interference with emergency response and evacuation plans. Relevant cumulative projects include residential, commercial, industrial, civic, and mixed-use developments within the city and adjacent jurisdictions, as well as redevelopment projects in urbanized and WUI areas, and transportation or infrastructure projects that could involve temporary lane closures or construction-related hazards.

**Would the project have a cumulative effect related to hazards and hazardous materials?**

The proposed General Plan Update, DTSP, and Development Code Update, in combination with other cumulative development projects, would involve construction and operational activities that include the transport, storage, and use of hazardous materials, and development in areas subject to wildfire hazards. While individual projects are required to comply with local, state, and federal regulations including those governing hazardous materials, emergency preparedness, and wildfire safety cumulative development increases the total volume of hazardous materials, potential exposure, and the overall population and structures located in or near hazard-prone areas. Cumulative development could also temporarily constrain emergency access during construction or exacerbate wildfire risks if proper access and fuel management standards are not maintained across multiple projects.

However, adherence to regulatory requirements, the City's LHMP, emergency operations plan, and standard wildfire and hazardous materials safety measures would minimize cumulative risks to people, structures, and the environment. Coordination with the San Bernardino County Fire Protection District, CAL FIRE, and other regulatory agencies ensures proper oversight of hazardous material handling, emergency preparedness, and wildfire prevention for both individual and cumulative projects. Compliance with applicable laws, regulations, and

emergency response plans ensures that cumulative projects in San Bernardino would not expose the public or the environment to substantial hazard-related risks. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

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# 3.10 HYDROLOGY AND WATER QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), together referred to as the "proposed project", to impact hydrology and water quality conditions in the City of San Bernardino. Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface- and groundwater. Surface water includes lakes, rivers, streams, creeks, and water that drains into these surface waters from storm drainage systems; groundwater is under the earth's surface. Additional information with respect to stormwater drainage and groundwater is provided in Section 3.19, *Utilities and Service Systems*.

The analysis in this section is based in part on the following technical reports:

- *City of San Bernardino General Plan Update Infrastructure Report for Water, Sewer, Storm Drainage, and Water Quality*, Fuscoe Engineering Inc., November 2025 (Appendix F-1).
- *City of San Bernardino Downtown Specific Plan Infrastructure Report for Water, Sewer, Storm Drainage, and Water Quality*, Fuscoe Engineering Inc., August 2022 (Appendix F-2).

## Terminology

- **BMPs**: best management practices
- **LID**: low impact development
- **MS4**: municipal separate storm sewer system
- **NPDES**: National Pollution Discharge Elimination System
- **SWPPP**: Stormwater Pollution Prevention Plan
- **SWQMP**: Stormwater Quality Management Plan
- **TMDL**: Total Maximum Daily Load. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards, with a factor of safety included. Required by Clean Water Act for impaired water bodies.
- **100-year storm**: rainfall total that has a 1 percent probability of occurring in a year.

## 3.10.1 Regulatory Framework

### CLEAN WATER ACT

The Clean Water Act (CWA) (Title 33 United States Code Sections 1251 to 1376) of 1972 is the primary federal law that governs and authorizes water quality control activities by the United

States Environmental Protection Agency (EPA), as well as the states. The statute's goal is to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters and sets water quality standards for all contaminants in surface waters. It is unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution. Section 402 of the CWA requires a permit for all point source (a discernible, confined, and discrete conveyance, such as a pipe, ditch, or channel) discharges of any pollutant into waters of the United States.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. As defined by the CWA, water quality standards consist of two elements: (1) designated beneficial uses of the water body in question and (2) criteria that protect the designated uses. Section 304(a) requires the EPA to publish advisory water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. In California, the EPA has delegated authority to the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) to identify beneficial uses and adopt applicable water quality objectives.

When water quality does not meet CWA standards and compromises designated beneficial uses of a receiving water body, Section 303(d) of the CWA requires that water body be listed as "impaired," and a total maximum daily load (TMDL) must be developed for the impairing pollutant(s). Once established, the TMDL allocates the load among the pollutant sources to the water body.

## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The National Pollutant Discharge Elimination System (NPDES) program under Section 402 of the CWA was established to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations include both point-source municipal waste discharge and nonpoint source stormwater runoff. All facilities that discharge stormwater into surface water from their municipal separate storm water systems (MS4s) are required to obtain an NPDES permit. The City of San Bernadino lies within the jurisdiction of the Santa Ana RWQCB and is subject to the waste discharge requirements of the Santa Ana RWQCB MS4 permit, Order No. R8-2010-0036, NPDES No. CAS618036.

Under NPDES Permit Provision XI, New Development (Including Significant Re-Development), the co-permittees are required to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects (SWRCB 2010). In addition, projects must address the potential for causing hydrologic conditions of concern if they disturb more than one acre of land and are not in an exempt area, as shown on the San Bernardino Hydrologic Conditions of Concern (HCOC) Exemption Map (San Bernardino County 2025).

## FEDERAL EMERGENCY MANAGEMENT AGENCY

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

## STATE

### Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code sections 13000 et seq.) is the basic water quality control law for California. This act established the SWRCB and divided the state into nine regional basins, each under the jurisdiction of an RWQCB. The SWRCB is the primary State agency responsible for the protection of California's water quality and groundwater supplies. The RWQCBs carry out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a water quality control plan or basin plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems.

The Porter-Cologne Act also authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, NPDES permits, Section 401 water quality certifications, and other approvals. Other State agencies with jurisdiction over water quality regulation in California include the California Department of Health Services for drinking water regulations, the CDFW, and the Office of Environmental Health and Hazard Assessment.

The City of San Bernardino is in the Santa Ana River Basin, Region 8, in the Upper Santa Ana Watershed. The Basin Plan was updated in October 2025 to comply with the current regulations and improve accessibility and Chapters 3 through 6 of the Basin Plan were updated to incorporate recent amendments effective on or before July 27, 2023 (Santa Ana RWQCB 2025a).

It gives directions on the beneficial uses of the state waters in Region 8; describes the water quality that must be maintained to support such uses; and provides programs, projects, and other actions necessary to achieve the established standards (Santa Ana RWQCB 2025a).

## SWRCB General Construction Permit

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the newly reissued SWRCB Construction General Permit (Order WQ 2022-0057-DWQ). Under the terms of the permit, applicants for construction permits must file Permit Registration Documents (PRDs) with the SWRCB before the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants for construction permits must also demonstrate conformance with applicable best management practices (BMPs) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a sampling program to ensure compliance with water quality standards, and on-site collection of samples and inspection of BMPs during a qualifying precipitation event.

## SWRCB General Industrial Permit

The Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ (2018) implements the federally required storm water regulations in California for storm water associated with industrial activities that discharge to waters of the United States. This regulation covers facilities that are required by federal regulations or by the RWQCBs to obtain an NPDES permit. Dischargers are required to eliminate non-storm water discharges, develop SWPPPs that include BMPs, conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program.

## SWRCB Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to control trash and Part 1, Trash Provisions, of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SWRCB 2025). They are collectively referred to as "the Trash Amendments." The Trash Amendments apply to

all surface waters of California and include a land use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high-density residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses.

The Trash Amendments provide a framework for permittees to implement their provisions. Full compliance must occur within 10 years of the permit, and permittees must also meet interim milestones such as average load reductions of 10 percent per year. The amendment mandates that the City needs to install catch basin filters on all City catch basins by December 2, 2030.

## Water Conservation in Landscaping Act of 2006

The Water Conservation in Landscaping Act includes the State of California's Model Water Efficient Landscape Ordinance (MWELO), which requires cities and counties to adopt landscape water conservation ordinances. The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and build resiliency for future droughts. State law requires all land use agencies, which includes cities and counties, to adopt a Water Efficient Landscape Ordinance that is at least as efficient as the MWELO prepared by the Department of Water Resources (DWR). The 2015 revisions to the MWELO improve water conservation in the landscaping sector by promoting efficient landscapes in new developments and retrofitted landscapes. The revisions increase water efficiency by requiring more efficient irrigation systems, incentives for grey water usage, improvements in on-site stormwater capture, and limiting the portion of landscapes that can be covered in high-water-use plants and turf. New development projects that include landscape areas of 500 square feet or more are subject to the MWELO. This applies to residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review. The size threshold for rehabilitated landscapes has not changed and remains at 2,500 square feet. The City of San Bernardino has enacted these provisions into its Municipal Code.

## California Government Code Section 8589.5

Government Code Section 8589.5 requires dam owners to submit inundation maps to the DWR. After the maps are approved, the dam owner must submit an emergency action plan to the California Office of Emergency Services. The dam owner must submit updated plans and inundation maps every 10 years, or sooner under certain conditions. The California Office of Emergency Services reviews and approves the emergency action plans. This law sets forth additional provisions for the emergency action plans including compliance requirements, exercises of the plan, and coordination with local public safety agencies (Cal OES 2025).

## California Water Code Section 13751

In 1949, the California Legislature concluded that collecting information on newly constructed, modified or destroyed wells would be valuable in the event of underground pollution, and

would also provide geologic information to better manage California's groundwater resources. Section 13751 of the Water Code requires Well Completion Report forms to be filed with DWR within 60 days from the date that construction, alteration, abandonment, or destruction of a well is completed. Completed forms are sent to the DWR regional office whose boundaries include the well (DWR 2025a).

### Sustainability Groundwater Management Act

The Sustainability Groundwater Management Act (SGMA) provides a framework for long-term sustainable groundwater management across California. Under the law local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP).

The City overlies the Bunker Hill Groundwater Basin. The Bunker Hill Basin is exempt from the SGMA requirements because it is an adjudicated basin with an established physical solution and court oversight for sustainable management. This exemption means that the basin does not need to develop a separate GSP under SGMA, as sustainable management is governed by the court judgment and implemented through the Watermaster. The court retains continuing jurisdiction to ensure beneficial use and avoid unreasonable groundwater use consistent with SGMA's sustainability goals, effectively fulfilling the state's groundwater sustainability objectives for this basin (DWR 2025b).

## REGIONAL

### San Bernardino County Flood Control District

The San Bernadino County Flood Control District (SBCFCD) is the regional drainage authority for San Bernardino County. The SBCFCD operates and maintains the county's extensive flood control facilities, including dams, conservation basins, channels, and storm drains. The SBCFCD issues encroachment permits for development within its facility or rights-of-way.

### San Bernardino County Hydrology Manual

The San Bernardino County Hydrology Manual, last updated in 2010, establishes the standardized methodology for calculating peak storm water runoff rates and volumes necessary for the design of flood control and drainage facilities maintained by SBCFCD. This manual provides instructions for determining design flows for various storm recurrence intervals (e.g., 25-, 50-, and 100-year events) to ensure that development projects adequately manage both on-site and off-site drainage impacts, prevent downstream erosion, maintain channel stability, and comply with state and federal regulations.

## San Bernardino County Storm Drain Master Plan

In 1982, the County of San Bernardino produced a Master Plan of Drainage which included the City of San Bernardino to manage the proper implementation of storm drain facilities, flood control facilities and drain inlets to safely protect people and property from flooding. Within the Master Plan of Drainage, there are more localized Comprehensive Storm Drain Plans covering specific areas. The City of San Bernardino falls within Comprehensive Storm Drain Plans # 3, #6 and #7. The DTSP Area is within Storm Drain Plan #7. The San Bernardino County Public Works Flood Control Planning Division is mainly responsible for long range advance planning and for coordinating flood control project development and funding with other agencies:

- Long Range Planning involves planning investigations and project studies; project prioritization; preparing annual capital improvement reports, special reports and studies; preparing and updating Master Plans of Drainage; documenting flooding events and damages; developing and processing funding agreements; preparing and tracking grant applications; Aerial photos and Historic information archiving and updating District's maps, exhibits, and displays.
- The Division conducts meetings with City Engineers in the respective Flood Zones. The meetings are designed to familiarize the City Engineers with flood control projects in planning, development and construction phases. District budget studies are also discussed.
- The Federal Projects Section of the Division is responsible for coordinating the development of federally sponsored flood control projects with the U.S. Army Corps of Engineers. Some of the past federally sponsored projects in our County included the construction of the Seven Oaks Dam and the San Timoteo Creek Basins and Channel.
- The Division coordinates Water Spreading Activities with local water agencies that use District facilities to recharge underground aquifers.

The City of San Bernardino Public Works Department implements the Comprehensive Storm Drain Plan No. #3, No. #6 and No. #7 on behalf of the SBCFCD within the City boundaries for all city projects. As projects come online, the City collects development impact fees for drainage improvements consistent with the Comprehensive Storm Drain Plans.

## Santa Ana RWQCB

The Santa Ana Regional Water Quality Control Board (RWQCB, Region 8) regulates water quality within the Santa Ana River watershed and adjacent coastal drainages. Its Water Quality Control Plan (Basin Plan) is the region's primary water quality planning document. The Basin Plan identifies the beneficial uses of surface waters and groundwater, establishes water quality objectives necessary to protect those uses, and outlines an implementation program consisting of projects, policies, and actions designed to achieve and maintain compliance with state and federal water quality standards.

The Basin Plan was originally adopted in 1995 and has since been amended multiple times, most recently in October 2025, which incorporated updates to Chapters 3 through 6 and revisions to salt and nutrient management provisions. The Basin Plan guides the RWQCB's permitting, enforcement, and monitoring programs and provides the regulatory basis for the issuance of the NPDES permits and other waste discharge requirements in Region 8 (Santa Ana RWQCB 2025a). Additional information regarding the NPDES permit is provided in the San Bernardino County Regional MS4 Permit section, below.

## San Bernardino County Regional MS4 Permit

In the San Bernardino County area of the Santa Ana River Basin, management and control of the municipal separate storm sewer system is shared by a number of agencies, including the San Bernardino County Flood Control District, San Bernardino County, and the cities of Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland, and Yucaipa.

On January 29, 2010, the Santa Ana RWQCB issued an area-wide MS4 permit to the San Bernardino County and municipalities in the county (Order No. R8-2010-0036, NPDES No. CAS618036). This permit expired on January 29, 2015. On August 1, 2014, the SBCFCD submitted a Report of Waste Discharge on behalf of San Bernardino County and its 16 incorporated cities. The submitted report serves as the permit renewal application for the MS4 permit. On March 1, 2024, staff of the Santa Ana Water Board released a tentative permit for MS4s. Pursuant to the 2010 MS4 Permit and 2024 tentative permit, the co-permittees were required to update and implement a Drainage Area Management Plan (DAMP) for its jurisdiction, as well as Local Implementation Plans (LIPs), which describe the Co-permittees' urban runoff management programs for their local jurisdictions (Santa Ana RWQCB 2025b).

Under the City's LIP, land development policies pertaining to hydromodification and low impact development (LID) are regulated for new developments and significant redevelopment projects. The use of LID Best Management Practices (BMPs) in project planning and design is to preserve a site's predevelopment hydrology by minimizing the loss of natural hydrologic processes such as infiltration, evapotranspiration, and runoff detention. These land development requirements are detailed in the San Bernardino County Technical Guidance Document, effective September 2013, which cities have incorporated into their discretionary approval processes for new development and redevelopment projects. Projects are required to comply with the LID requirements in accordance with the LID hierarchy.

The LID hierarchy requires new developments and re-developments to implement BMPs under the LID hierarchy as described in the Technical Guidance Document. The LID hierarchy requires new projects to first infiltrate, then harvest and reuse, then biofilter stormwater runoff from their project site. In areas where infiltration is determined to be infeasible, either through infiltration testing or groundwater concerns, harvest and reuse BMPs may prove feasible for

projects that incorporate ample landscaping and/or have high indoor toilet flushing demands (i.e. hotels). For areas that cannot infiltrate or utilize harvest and reuse systems, projects will be able to biofilter stormwater through biofiltration BMPs such as vegetated swales and bioretention basins.

## San Bernardino County Stormwater Program

The Technical Guidance Document for Water Quality Management Plans (WQMP) for the Region 8 area of San Bernardino County is the guidance document for the project's stormwater design in compliance with Santa Ana RWQCB requirements for Priority Projects or Transportation Projects. The MS4 permit requires that a preliminary project-specific WQMP be prepared early in the project development process and that a Final WQMP be submitted prior to the start of construction. A project-specific WQMP is required to address the following (Santa Ana RWQCB 2013):

- Develop site design measures using LID principles.
- Establish project-specific design capture volume and applicable hydrologic conditions of concern requirements.
- Evaluate feasibility of on-site LID BMPs.
- Maximum hydrologic source control, infiltration, and biotreatment BMPs.
- Select applicable source control BMPs.
- Address post-construction BMP maintenance requirements

As described below, this requirement under the MS4 Permit is implemented by the City under San Bernardino Municipal Code Section 8.80 which provides City-specific requirements for preparing a Storm Water Quality Management Plan similar to the WQMPs under the MS4 Permit.

## Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan

The 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (2020 IRUWMP) is the Urban Water Management Plan (UWMP) for the water management agencies in the Upper Santa Ana River Watershed. The UWMPs of the retail water suppliers for the City of San Bernardino, San Bernardino Municipal Water Department and East Valley Water District, are included as chapters within this document.

## LOCAL

### City of San Bernardino Storm Drain Design Policy

The City of San Bernardino's Storm Drain Design Policy provides storm drain design standards for all development projects. Specifically, the policy mandates that major drainage systems in developed areas must contain the 25-year storm frequency within the pipeline capacity, the 50-year storm between the street curbs, and the 100-year storm within the street right-of-way, thereby mitigating the risk of structural flooding. Hydrologic calculations must adhere to the San Bernardino County Hydrology Manual and projects must be designed to contain post-development peak flows, potentially requiring the incorporation of detention basins to ensure that flows are adequately attenuated prior to discharge into the municipal system.

### City of San Bernardino General Plan

The 2005 General Plan addresses water quality and hydrology in the Energy and Water Conservation Element. These include policies encourage compliance with existing regulations in addition to implementation of best management practices for reducing impacts of development projects.

### City of San Bernardino Municipal Code

The following sections of the San Bernardino Municipal Code (SBMC) are relevant to hydrology and water quality:

- **Title 8, Chapter 8.79, Floodplain Management**, this section outlines the flood load and flood resistant construction requirements of the building codes in specific flood hazard areas and establishes comprehensive regulations for management of flood hazard areas.
- **Title 8, Chapter 8.80, Storm Water Drainage System,** outlines the City's requirements for development to prevent non-storm water discharges into the city's storm water drainage system. The types of prohibited discharges are detailed in Article 2, General Conditions and Prohibitions. Article 3, Residential Requirements, and Article 4, Industrial and Commercial Requirements, detail requirements specific to residential and commercial/industrial developments, including that all businesses implement BMPs pursuant to the *California Storm Water Best Management Practice Handbook* or the current San Bernardino County Storm Water Program's *Report of Waste Discharge*. Requirements specific to construction activities in the City are as follows:
    - **Section 8.80.501, Storm Water Quality Management Plan**, states that prior to the issuance of any grading or building permit, all qualifying land development projects shall submit and have approved a storm water quality management plan (SWQMP) to the city engineer on a form provided by the City. The SWQMP shall identify all BMPs that will be incorporated into the operation of the project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary

during the life of the project. The SWQMP submittal applies to construction projects covered by the NPDES general construction permit as well as construction projects less than five acres. Following the approval of the SWQMP by the city engineer, the owner of the qualifying project and the city shall enter into a recordable Storm Water Quality Management Plan Agreement which shall contain enforceable mechanisms to ensure that the operations and maintenance costs of post-construction BMPs are paid in perpetuity.

- **Section, 8.80.502 General Permit for Storm Water Discharges from Construction Activity,** states that construction activities which disturb one acre or more of land shall apply for coverage under the general storm water permit for construction activity with the SWRCB.

- **Title 17, Chapter 17.06, Water Wise Landscape Program,** of the SBMC requires new development to submit and implement a water conservation plan to reduce water consumption in the landscape environment by using drought tolerant principals.

## 3.10.2 Existing Conditions

Unless otherwise noted, the following existing conditions information is from Appendices F-1 and F-2.

### CITYWIDE AREA

### Hydrology

#### *Regional Drainage*

The City of San Bernardino is located within the Santa Ana River Basin, which is regulated by the Santa Ana RWQCB. Specifically, the City is within the Upper Santa Ana River Watershed covers portions of the Counties of San Bernardino, Orange, and Riverside. The Santa Ana River Basin is generally arid and therefore has little natural perennial surface water. Because of the aridity, water is stored in a variety of downstream water storage reservoirs including Lake Perris, Lake Mathews, and Big Bear Lake, as well as in some flood control areas including the Prado Dam area and Seven Oaks Dam area.

#### *Local Drainage*

The City of San Bernardino and the San Bernardino Flood Control District (SBCFCD) share responsibility of the stormwater system in the City. The SBCFCD is responsible for operations and maintenance of the regional flood control facilities. The City is responsible for the local drainage system, detention basins, and storm drain lines that connect to the regional facilities. The City is located within Flood Control District Zone 2. The City's storm drain system eventually

empties into the Santa Ana River without being cleaned at treatment plants. The Santa Ana River flows in a southwesterly direction and eventually drains to the Pacific Ocean. The major creeks and watersheds within the City include Lytle Creek, Twin Creek, Warm Creek, and the Santa Ana River. A small portion of the San Matero Creek watershed also resides within the City near the southern boundary. The City's existing storm drain facilities are shown in Figure 3.10-1, *City and San Bernardino Flood Control District Existing Storm Drain Facilities*.

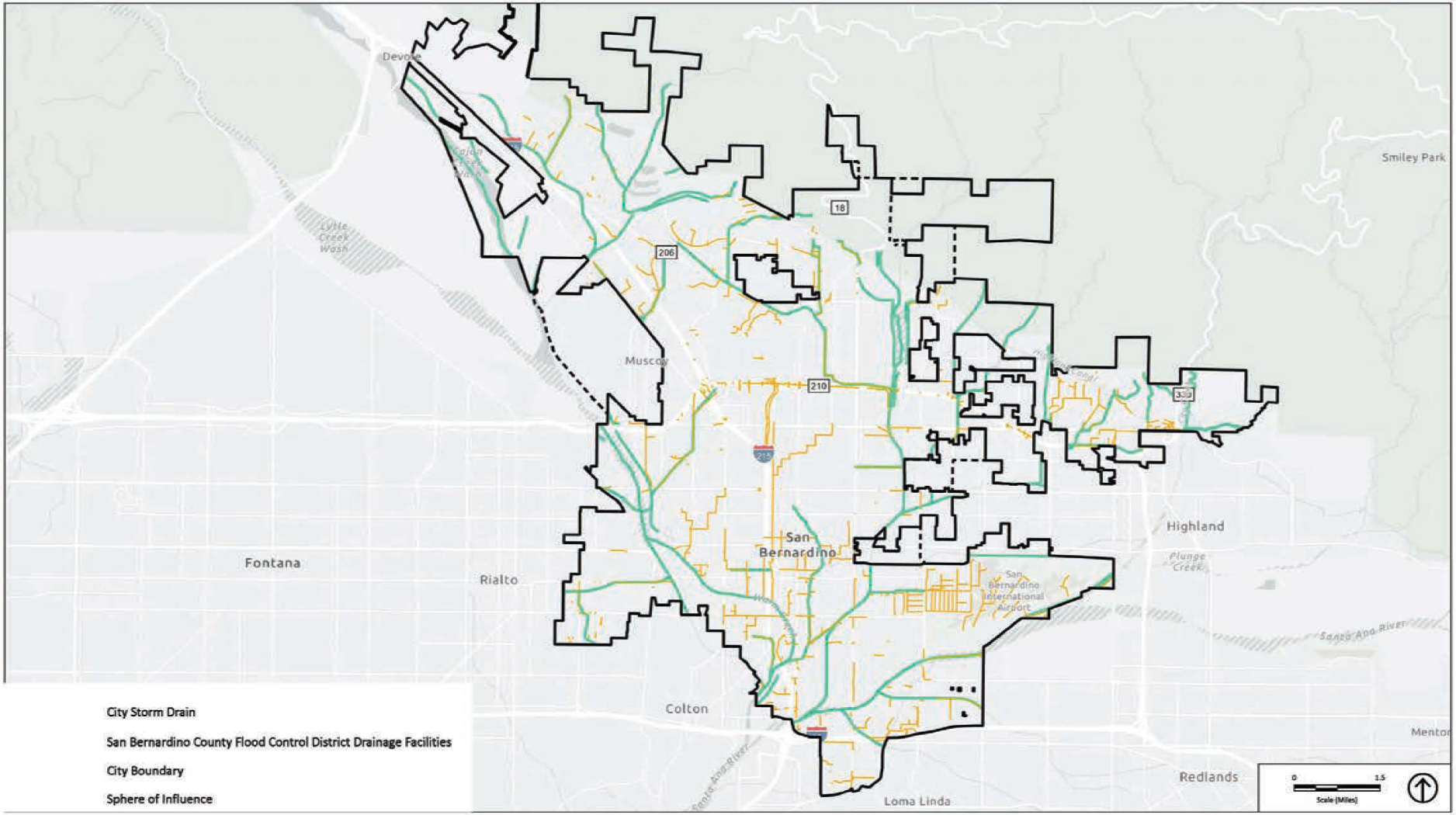
### *Groundwater Drainage*

The City lies primarily within the Bunker Hill Basin, a large groundwater basin that is located at the top of the Santa Ana River Watershed and receives runoff from the headwaters of the Santa Ana River, Mill Creek, Lytle Creek and other smaller tributaries. The Bunker Hill Basin serves as the primary water source for the City as well as numerous other water suppliers and individual water users. The Bunker Hill Basin extends over 120 square miles across San Bernardino Valley. The basin contains an estimated 3.5- to 5.0 million acre-feet of groundwater of which 1.5 million acre-feet is extractable. The Bunker Hill Basin is managed by the San Bernardino Valley Water Conservation District.

The City also resides within the Rialto-Colton Basin covering the southwestern portion of City. The basin contains an estimated 2.5 million acre-feet of groundwater of which 210,000 acre-feet is extractable. The Rialto-Colton Basin is managed by the San Bernadino Valley Municipal Water District, the City of Rialto and the West Valley Water District.

## Water Quality

The Santa Ana RWQCB regulates the water quality of the Santa Ana River Watershed through its Basin Plan. The Basin Plan specifically (i) designates beneficial uses for surface waters and ground waters, (ii) sets narrative and numerical objectives that must be met in order to protect the beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. The Santa Ana RWQCB Basin Plan provides all relevant information necessary to carry out federal mandates for the antidegradation policy, 303(d) listing of impaired waters, and related Total Maximum Daily Loads (TMDLs), and provides information relative to National Pollutant Discharge Elimination System (NPDES) and Waste Discharge Requirement (WDR) permit limits (Santa Ana RWQCB 2025c).




Source: Fuscoe 2025.

**Figure 3.10-1**
**City and San Bernardino County Flood Control District Existing Storm Drain Facilities**

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### *Surface Water*

According to the Basin Plan, the receiving water with existing beneficial uses in the General Plan Update Area is Warm Creek (Santa Ana RWQCB 2025a). These beneficial uses include: Water Contact Recreation (REC 1), Non-Contact Water Recreation (REC 2), Wildlife Habitat (WILD), and Warm Freshwater Habitat (WARM). Warm Creek is also the only impaired water body in the General Plan Update Area per Section 303(d) of the CWA based on indicator bacteria. A TDML is proposed for Warm Creek with an anticipated completion date of 2029. While numeric objectives have not been established for Warm Creek, the Basin Plan specifies 35 narrative objectives for all surface waters in the Upper Santa Ana River Basin (Santa Ana RWQCB 2025a).

### *Groundwater*

The Basin Plan has established specific water quality numeric objectives for the San Bernardino County groundwater management zones that include the City of San Bernardino (Santa Ana RWQCB 2025a). In the Bunker Hill Basin, two separate groundwater management zones apply to the City, each with their own water quality objectives. Table 3.10-1, *Groundwater Basin Water Quality Objectives*, shows the numeric objectives for these groundwater basins in the General Plan Update Area. 20 narrative objectives have also been established for the groundwater basins in the Upper Santa Ana River Basin.

**Table 3.10-1 Groundwater Basin Water Quality Objectives**

| Groundwater Management Zone | Total Dissolved Solids Objective (mg/L) | Nitrate (as N) Objective (mg/L) |
|---|---|---|
| Bunker Hill - A | 310 | 2.7 |
| Bunker Hill - B | 330 | 7.3 |
| Colton | 410 | 2.7 |
| Rialto | 230 | 2.0 |

Source: See Appendix F-1.

Notes: mg/L = milligrams of a dissolved substance per liter of water.

## Flooding

### *Flood Zones*

Floodplains in the City generally follow the drainage patterns of the Cajon Wash, Lytle Creek, East Twin Creek, Warm Creek, and City Creek, which all flow southeast from the mountains towards the Santa Ana River. Flood hazard areas identified on the Flood Insurance Rate Map are identified as a Special Flood Hazard Area (SFHA). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year

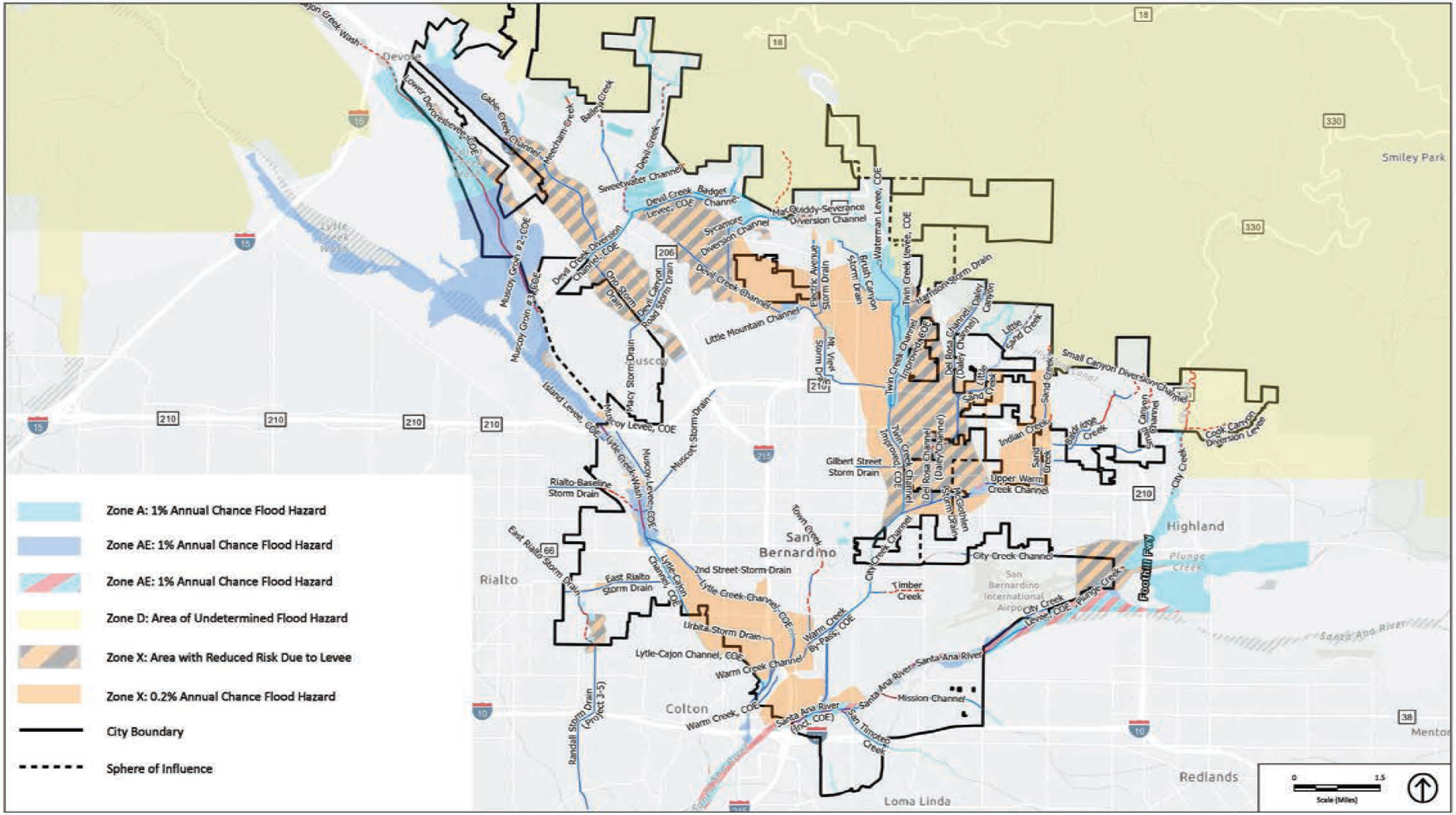
flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood hazard areas, labeled Zone B or Zone X (shaded) are also shown on the FIRM, and are the areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled Zone C or Zone X (unshaded).

According to FEMA, there are many areas within the City limits that are within SFHA flood zones (1% chance of annual flood or higher) and require flood insurance, as shown in Figure 3.10-2, *Citywide Flood Zones*. These zones are referred to as Zone A/Zone AE flood hazard zones. Other flood zones within the City include Zone X and Zone D. Zone X (unshaded) is designated as an area determined to be either outside the 500- year flood plain (0.2%) or protected by levee from 100-year flood (1%) (FEMA 2025). Zone D includes areas of undetermined flood risk. Any development within these areas will be required to follow FEMA and the City's floodplain safety requirements including flood analysis, proper setbacks, and sufficient pad elevations.

### *Dam Inundation*

Inundation hazards result from a partial or complete failure of a dam. Causes of dam failure include flooding, earthquake, blockage, landslide, improper maintenance or operation, poor construction, vandalism, and terrorism. While the probability of a complete failure of a dam is remote, it is extremely hazardous because it can occur quickly, with little warning. Areas directly below the dam are at the greatest risk. The area downstream of a dam that is potentially at risk for flooding if the dam fails is called the "dam inundation zone."

Dams are assigned hazard ratings. A dam has a "high" hazard potential if it stores more than 1,000 acre-feet of water, is higher than 150 feet, has the potential for downstream property damage and/or evacuation, and would likely cause loss of life if it failed. Dams with a "significant" hazard potential or those where failure would not result in the loss of human life, but could cause economic loss, damage the environmental, disrupt lifeline facilities, and so forth. Dams with a low hazard rating present a minimal hazard.




Source: Fuscoe 2025.

**Figure 3.10-2**
**Citywide Flood Zones**

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Figure 3.10-3, *Citywide Dam Inundation Areas*, shows the dam inundation zones in San Bernardino. Table 3.10-2, *Reservoir and Dam Inundation Hazards*, describes the dams and reservoirs that have the potential to cause inundation in the City under failure conditions. The primary inundation hazard to San Bernardino is Seven Oaks Dam, located four miles east of San Bernardino in Highland. Failure of the dam would cause severe flooding along the Santa Ana River in the southern and southeastern portions of the City. Should the dam fail, inundation is 30 minutes to San Bernardino City limits and about 80 minutes to the DTSP Area. However, since the dam is a flood control feature, it is usually dry and rarely approaches a third of the total capacity.

**Table 3.10-2 Reservoir and Dam Inundation Hazards**

| Dam/Reservoir | Year Built | Storage Capacity (acre-feet) | Hazard Rating | Condition of Dam |
|---|---|---|---|---|
| Seven Oaks | 1999 | 145,600 af | High | Satisfactory |
| Devils Canyon #1 | 1934 | 79 | High | Satisfactory |
| Perris Hill Reservoir | 1962 | 31 | High | Satisfactory |
| Devil Canyon | 1995 | 980 | High | Satisfactory |
| Little Mountain | 1958 | 150 | High | Satisfactory |
| Mineral Hot Springs | 1967 | 37 | High | Satisfactory |
| Small Canyon | 1957 | 20 | High | Satisfactory |

Source: DWR 2025c

There are no State or local restrictions for development in dam inundation zones; however, each dam owner is required to prepare an emergency action plan (EAP) and coordinate its response to a dam break with local authorities. The EAP is required to include warning and notification procedures that typically involve the Standard Emergency Management System, the San Bernardino County Sheriff's Department, the County, and the San Bernardino Fire Department.

### *Seiches and Tsunamis*

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin such as a reservoir, harbor, lake, or storage tank. Seiches can be created by winds, earthquakes, or tsunamis. Bodies of water such as bays, harbors, lakes, reservoirs, or large aboveground storage tanks can experience seiches. The San Bernardino Municipal Water Department manages 38 reservoirs within the vicinity of the City with a combined storage capacity of approximately 115 million gallons (San Bernardino 2025). If a seiche occurred at the dam with the largest inundation hazard for the City, the Seven Oaks Dam, it would cover a much smaller area than a catastrophic failure of the dam, and it would be unlikely that any flood waters would reach the City. Additionally, seismic activity at enclosed aboveground water tanks in the City are unlikely

to result in a seiche. Seismic seiche generation requires sufficient water volume and geometry to sustain standing wave motion and is generally evaluated in larger water bodies in hazard analyses (USGS 2025).

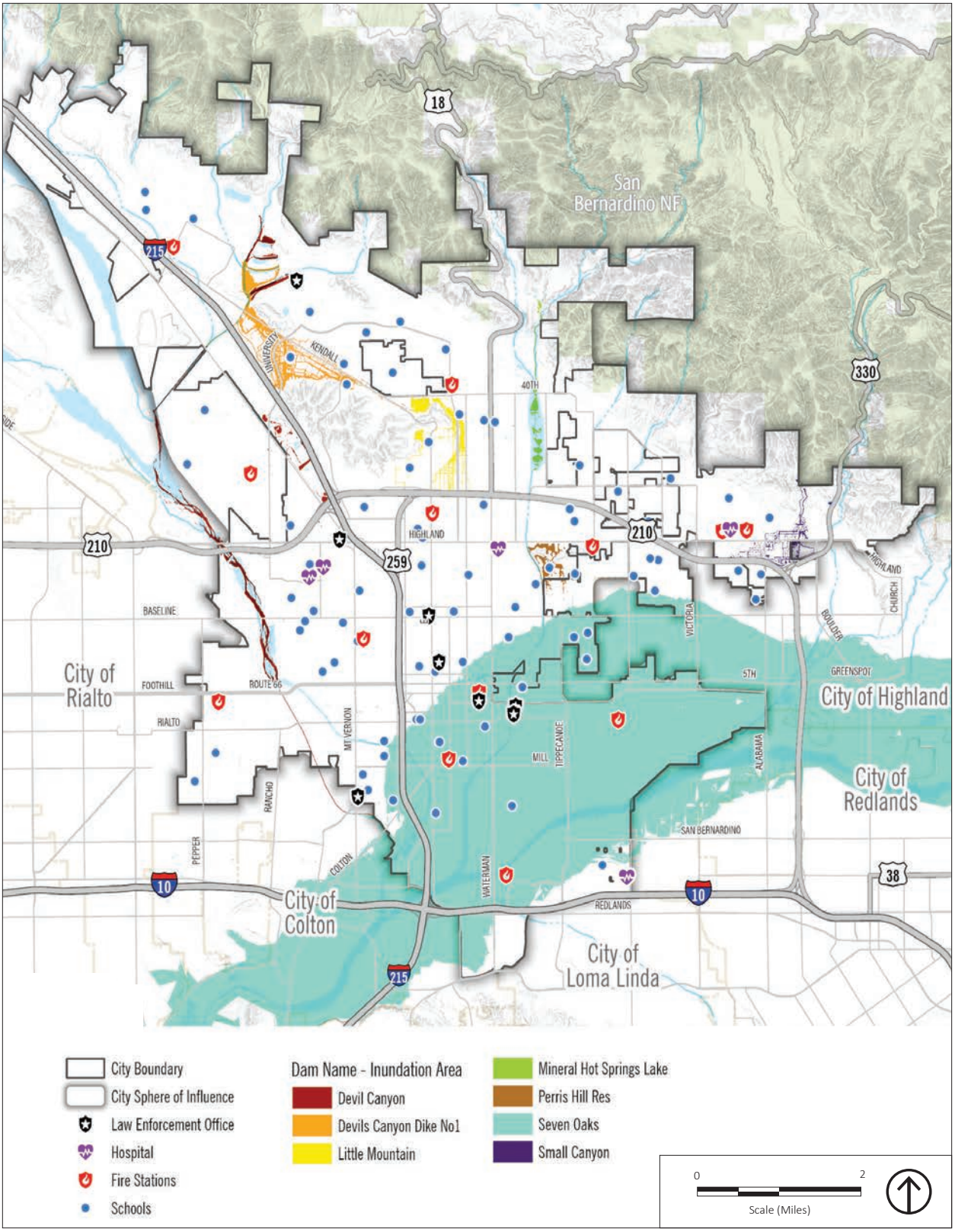
A tsunami is a great sea wave produced by undersea disturbances such as tectonic displacement or large earthquakes. The project site is approximately 100 miles inland from the ocean and therefore not at risk of flooding from a tsunami.

## DOWNTOWN AREA

The DTSP Area is mostly built-out with some vacant lots in the northwestern portions of the study area. Stormwater runoff connects to a series of storm drain lines within DTSP Area which include both City and SBCFCD drainage facilities. Storm drain sizes range from 12 inches to 72 inches within DTSP Area, as shown in Figure 3.10-4, *Downtown Specific Plan Area Drainage Facilities.*

The DTSP Area is within the Warm Creek sub-watershed and ultimately discharges into the Prado Reservoir. Warm Creek is listed on the 303(d) list for indicator bacteria, as described above.

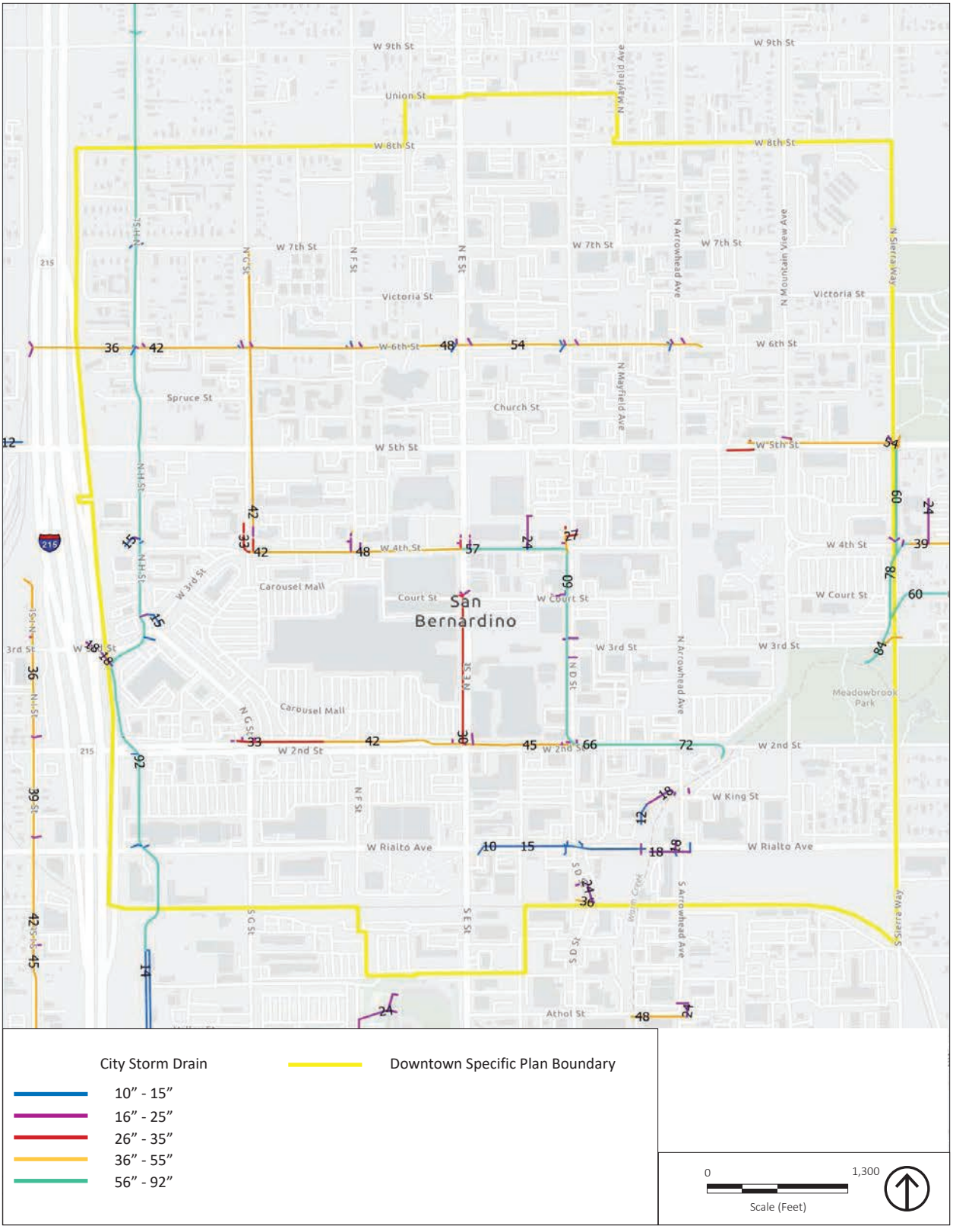
The entirety of the DTSP Area is identified as an area of minimal flood hazard, Zone X, higher than the elevation of the 0.2-percent-annual-chance flood, as shown in Figure 3.10-5, *Downtown Specific Plan Area Flood Zones*. As shown in Figure 3.10-3, the DTSP Area is the inundation area of the Seven Oaks Dam.




Source: PlaceWorks, City of San Bernardino, 2026

Figure 3.10-3
**Citywide Dam Inundation Areas**

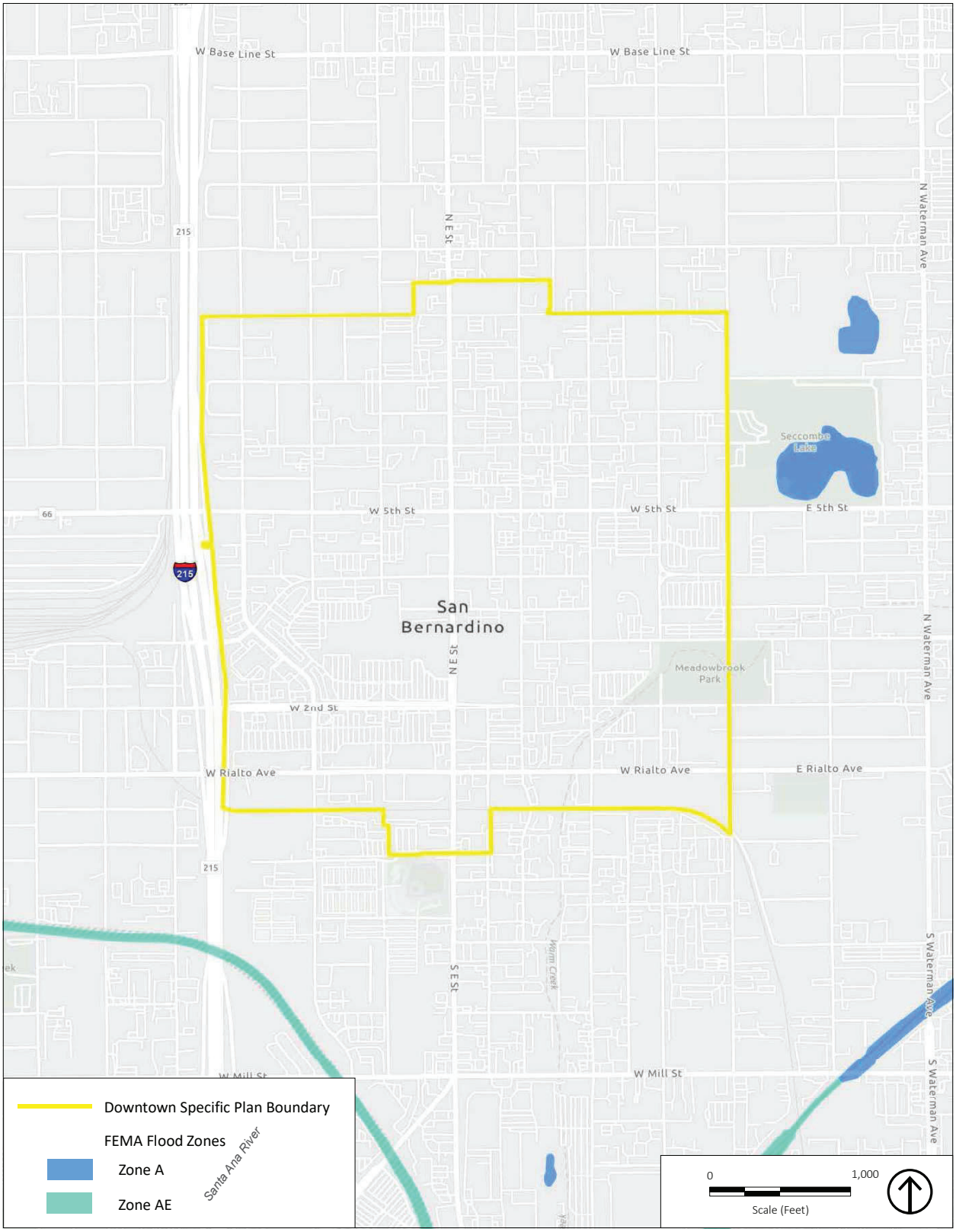
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Source: Fuscoe 2022.

Figure 3.10-4
**Downtown Specific Plan Area Drainage Facilities**

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Source: Fuscoe 2022.

Figure 3.10-5
**Downtown Specific Plan Area Flood Zones**

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## 3.10.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning hydrology and water quality. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning hydrology and water quality if it would:

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

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i) Result in a 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 polluted runoff.

    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.

### METHODOLOGY

The analysis presented below is based on a review of existing regulatory procedures, plans, and ordinances that reduce impacts to water quality and hydrology, including the State Construction Stormwater General Permit, the Santa Ana RWQCB MS4 Permit, provisions in the SBMC, San Bernardino County Department of Public Works Manual and Technical Guidance Document, and the City's Local Hazard Mitigation Plan, among other regulations. This analysis also refers to

FEMA's National Flood Hazard Layer and the DWR's Dam Inundation web tool. Information pertaining to the City's existing storm drainage infrastructure was derived from reports prepared by Fuscoe Engineering Inc. for the DTSP Area in August 2022 (See Appendix F-2) and General Plan Update Area in November 2025 (Appendix F-2). It should be noted that when new development on vacant lots occurs or properties are redeveloped, it provides opportunities for upgraded flood control improvements, on-site detention, reduction of localized ponding in the adjacent streets and water quality treatment. In determining the level of significance, the analysis assumes that future projects facilitated by the proposed project would comply with these federal, state, and local laws, ordinances, and regulations.

## 3.10.4 Project Impact Analysis

**a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

#### Construction

The proposed General Plan Update would result in new development and redevelopment in the City, including infill development of vacant lots, changes in impervious conditions, reduction in large parking lots replaced with mixed use and parking structures, and increased landscaping throughout the area. Buildout in accordance with the proposed project would result in construction activities that could impact water quality and waste discharge throughout the City.

Clearing, grading, excavation, and construction activities associated with General Plan Update have the potential to impact water quality through soil erosion and by increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, future development would require compliance with the SWRCB Construction General Permit (Order WQ 2022-0057-DWQ). The SWRCB mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide Construction General Permit. The Construction General Permit also requires that prior to the start of construction activities, the project applicant must file PRDs with the SWRCB, which includes notice of intent, risk assessment, site map, annual fee, signed certification statement, and SWPPP.

A SWPPP requires the incorporation of BMPs to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. The construction contractor is always required to maintain a copy of the SWPPP at the site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the project applicant is required to provide proof of filing of the PRDs with the SWRCB, which include preparation of SWPPP.

In addition, SBMC Chapter 8.80, *Storm Water Drainage System*, requires that an SWQMP be submitted and approved by the City Engineer. The SWQMP submittal applies to construction projects covered by the General Construction Permit as well as construction projects that are less than five acres. Submittal of the PRDs, implementation of the SWPPP, and the SWQMP throughout the construction would address anticipated and expected pollutants of concern as a result of construction activities.

While the proposed project would accommodate additional development intensity and associated construction activity, compliance with existing state and local regulatory requirements—such as the Construction General Permit, preparation and implementation of a SWPPP, and submittal of SWQMPs—would ensure that construction-related pollutants are effectively managed. The City's established regulatory framework, combined with BMPs, would continue to minimize potential erosion, sedimentation, and contaminant discharges during construction. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## Operation

Pollutants commonly generated during the post-construction phase of urban development include sediment, metals, nutrients, pesticides, hydrocarbons, and other contaminants associated with vehicular use, landscaping, and impervious surfaces. Under the proposed project, future development would comply with the SBMC and applicable regional and state water quality regulations. For example, new development under the proposed project would be required to comply with the Santa Ana RWQCB MS4 Permit and SBMC Chapter 8.80 through the preparation of a SWQMP. The SWQMPs would identify all BMPs that to be incorporated into the operation of the project to control stormwater and non-stormwater pollutants during and after construction and shall be revised as necessary during the life of the project. Operational BMPs include:

- **Site Design BMPs:** Incorporation of permeable surfaces, preservation of natural drainage features such as swales, and use of detention and retention basins to reduce runoff volumes and promote infiltration.

- **Source Control BMPs:** Minimizing pollutant exposure through impervious paving in fueling and trash storage areas, directing run-on away from pollutant sources, implementing spill containment, and ensuring proper waste handling.

- **Non-structural BMPs:** Public education, employee training, operational restrictions (e.g., prohibiting fertilizer, pesticide, and waste discharges to streets or storm drains), and routine inspection and maintenance programs.

- **Treatment Control BMPs:** On-site pollutant removal through vegetated biofiltration swales, infiltration systems, and hydrodynamic separators, designed in accordance with the San Bernardino County Technical Guidance Document for WQMPs (Santa Ana RWQCB 2013).

Following the approval of the SWQMP by the City Engineer, the owner of the qualifying project and the City would enter into a recordable Storm Water Quality Management Plan Agreement which would contain enforceable mechanisms to ensure that the operations and maintenance costs of post-construction BMPs are paid in perpetuity. These regulatory mechanisms and engineering controls would ensure that urban runoff is managed to meet or exceed applicable water quality standards. Implementation of these requirements would minimize pollutant loads to the City's storm drain system and prevent degradation of surface water or groundwater quality.

Additionally, the proposed General Plan Update contains policies that would require compliance with existing federal, state, and local regulations controlling water quality and encourage the City to pursue actions that would benefit water quality in the City. These policies are shown in Table 3.10-3, *Water Quality: Proposed General Plan Update Policies*.

**Table 3.10-3 Water Quality: Proposed General Plan Update Policies**

| | |
|---|---|
| **Open Space and Conservation Element** | |
| OSC-5.1 | **Waterway protection**. Require all public and private activities to take appropriate measures to protect the integrity of waterways and comply with antidegradation rules of the State Water Resources Control Board. |
| OSC-5.2 | **Groundwater pollution**. Work with businesses and appropriate governmental agencies to pursue and ensure full remediation of groundwater or soil contamination from hazardous materials and use. |
| OSC-5.4 | **NPDES compliance**. Ensure compliance with the National Pollutant Discharge Elimination System permits, including requiring Storm Water Pollution Prevention Plans for new projects and redevelopment |
| OSC-5.5 | **Urban runoff**. Require new projects to incorporate best management practices to control discharge of pollutants during construction and for the project life. Require:<br>▪ Source controls to minimize pollutants, such as oil and grease, industrial discharges, pesticides, etc.<br>▪ Structural controls such as green roofs, permeable pavement, infiltration basins, and biofiltration.<br>▪ Non-structural controls to reduce impervious surfaces, plant trees/landscaping, and so forth.<br>▪ Construction site controls that are aimed at reducing erosion and sediment drainage. |
| OSC-5.6 | **Impaired waterways**. Continue to partner with regional agencies, industry, and the community on projects and enforcement of regulations that aim to restore impaired waterways in the City to their full beneficial uses. |

Mandatory preparation and implementation of project-specific SWQMPs, adherence to LID principles, enforcement of NPDES permit and County Technical Guidance Document requirements, and compliance with General Plan Update policies would ensure that post-construction discharges are effectively controlled and treated prior to entering the storm drain system. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As with the proposed General Plan Update, projects pursuant to the DTSP would be subject to the requirements under the statewide Construction General Permit and the Santa Ana RWQCB MS4 permit, which would reduce water quality impacts for construction and operational activities. Construction sites of 1 acre or larger would be required to prepare and implement a SWPPP in accordance with the requirements of the Construction General Permit subject to the oversight of the Santa Ana RWQCB. The SWPPP would include BMPs to reduce or eliminate erosion and sedimentation from soil disturbing activities, as well as proper materials and waste

management to reduce the potential for pollutants to enter receiving waters. As outlined above, the incorporation of site design, LID features and BMPs, as required under the Santa Ana RWQCB MS4 Permit, would ensure that operational-related pollutants of concern are diverted from the City's stormwater drainage system. The SMBC's SWQMP requirement also ensures that construction practices and operational BMPs and LID features are incorporated into projects within the City. Compliance with these regulations would ensure that impacts to surface water and groundwater quality in the DTSP Area are **less than significant**.

Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

### Groundwater Supplies

Water service in the City of San Bernardino is provided by San Bernardino Municipal Water Department (SBMWD) and the East Valley Water District (EVWD). Each water retail supplier extracts its own groundwater and EVWD also purchases imported surface water from the San Bernardino Valley Municipal Water District (SBVMWD). SBMWD and EVWD's groundwater is from the Bunker Hill Basin, which is adjudicated and managed by the Western-San Bernardino Watermaster. The Western-San Bernardino Watermaster conducts monitoring of groundwater extractions to ensure sustainable yield of the basin. New or modified wells must comply with Watermaster rules and state/county permitting requirements, ensuring that project operations would not substantially decrease groundwater supplies (WSBW 2025).

The Bunker Hill Basin is also considered by DWR to be a very low priority groundwater basin (DWR 2025c). The SBVMWD has an allotted amount of water that can be pumped from the basin so that the safe yield is not exceeded. The 2020 Upper Santa Ana River Watershed IRUWMP also projects that this groundwater basin would have adequate supply for demand under the General Plan Update, as discussed in Section 3.19, *Utilities and Service Systems*. Therefore, the General Plan Update would not substantially decrease groundwater supplies such that it would impede sustainable groundwater management. Therefore, impacts are **less than significant**.

**Significance without Mitigation:** Less than significant.

## Groundwater Recharge

The City primarily overlies the Bunker Hill Basin and a western portion of the City overlies the Rialto-Colton Basin. Future development pursuant the proposed General Plan Update would increase the amount of impermeable surfaces in the City and reduce the amount of permeable surfaces available for groundwater recharge. Such development would be required to meet the regulatory requirements for limiting impacts to groundwater recharge, including:

- BMPs for compliance with NPDES regulations, for instance, preservation of existing vegetation.
- Preparation of project-specific hydrology studies estimating project impacts on drainage, in accordance with procedures in the San Bernardino County Technical Guidance Document for WQMPs.

Additionally, the General Plan Update contains Policy OSC-5.5 which would promote recharge on project sites through the implementation of BMPs, as shown in Table 3.10-3.

With the implementation of policies that promote LID and infiltration for new development projects, the projects under the proposed General Plan Update would not substantially interfere substantially with groundwater recharge such that it would impede sustainable groundwater management. Therefore, impacts are considered **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is within the service area of the SBWMD, which purchases groundwater from SBVMWD. According to the 2020 IRUWMP, SBVMWD's projected supply, which consists of water from the Bunker Hill Basin, during five consecutive single and multiple dry years (2025, 2030, 2035, 2040, and 2045), would exceed its water demands (SBVMWD 2021). As discussed in Section 3.19, *Utilities and Service Systems*, the increase in demand within the DTSP Area would not exceed the supply available to SBVMWD. Additionally, since the Bunker Hill Basin is adjudicated by the Western-San Bernardino Watermaster which ensures sustainable management of the basin, the DTSP would not impede sustainable management of the basin.

Much of the DTSP Area is currently developed with impervious surfaces. Compliance with existing regulatory standards that require adherence to the SBMC and incorporation of LID features would likely increase the amount of pervious surfaces under redevelopment properties in the DTSP Area. These BMPs and LID features would help to capture stormwater onsite and allow for infiltration of stormwater that would be available for groundwater recharge. Therefore, implementation of the DTSP would not substantially interfere with groundwater recharge or deplete groundwater supplies. This impact would be **less than significant**.

**Significance without Mitigation:** Less than significant.

**c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:**

**i) Result in a substantial erosion or siltation on- or off-site?**

**ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?**

**iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**iv) Impede or redirect flood flows?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The proposed General Plan Update contains policies that would reduce impacts associated with drainage and hydrology impacts, as shown in Table 3.10-4, *Hydrology: Proposed General Plan Update Policies*. These policies are referenced in the following analysis.

**Table 3.10-4 Hydrology: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-3.1 | **Floodplain Development**. Restrict new development in the designated floodway. Require new development in the 100-year and 500-year flood hazard zones to comply with provisions of the Flood Plan Overlay Zone. |
| S-3.2 | **Flood Infrastructure Maintenance**. Coordinate with the San Bernardino County Flood Control District to maintain flood control systems and keep natural drainage courses free of obstructions. |
| S-3.3 | **Reducing Development Impact**. Require the use of green infrastructure and low impact development practices, as feasible, to mimic natural processes and absorb impacts from stormwater and flooding. |
| S-3.4 | **Storm Drain Requirement**. Coordinate with the County Planning Department for projects within the City's Sphere of Influence to disapprove development projects that do not have adequate storm drain systems. |
| S-3.5 | **Storm Drain Capacity**. Ensure that storm drains in developed areas comply with the County Flood Control Storm Drain Plans; design drains in foothills to convey 100-year flows where downstream systems are lacking. |
| S-3.6 | **National Flood Insurance.** Continue to participate in FEMA's National Flood Insurance Program to ensure that residents and business property owners in San Bernardino can obtain flood insurance. |

## Erosion and Siltation

Future development associated with the proposed General Plan Update would involve site improvements that require grading, excavation, and soil exposure during construction, with the potential for erosion or siltation to occur. If not controlled, the transport of these materials to local waterways could temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles. To minimize this impact, future projects pursuant to the General Plan Update would be required to comply with the requirements in the State's Construction General Permit, including preparation of a notice of intent and SWPPP prior to the start of construction activities (see Impact a). The SWPPP would describe the BMPs to be implemented during the project's construction activities. The implementation of the BMPs during the construction phase would include the following measures to minimize erosion and siltation:

- Minimize disturbed areas of the site.
- Install on-site sediment basins to prevent off-site migration of erodible materials.
- Implement dust control measures, such as silt fences and regular watering of open areas.
- Stabilize construction entrances/exits.
- Install storm drain inlet protection measures.

- Install sediment control measures around the site, including silt fences or gravel bag barriers.

Compliance with SBMC Chapter 8.80 also requires the implementation of BMPs to control erosion, debris, and construction-related pollutants. This would further reduce the potential for erosion and siltation during the construction phase.

For post-construction, projects under the General Plan Update would be required to control stormwater discharges through preparation of a SWQMP identifying BMPs for reducing or eliminating runoff (see Impact a). Therefore, impacts with respect to erosion and siltation would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Flooding On- and Off-Site

Future development would increase the amount of impermeable surfaces in the City, which could result in future on- and off-site flooding. As discussed above, under "Erosion and Siltation," future development projects would implement BMPs outlined in SWPPPs to reduce flooding impacts due to runoff during construction and BMPs included in SWQMPs to reduce the potential for post-construction flooding impacts. Projects that would connect to City and SBCFCD storm water drainage infrastructure would be required to comply City and County hydrology requirements which include the preparation of hydrology studies and drainage analyses that document the peak runoff rates from the developed site and evaluate the capacity of the storm drain system flows from project sites. Additionally, General Plan Update Policy S-3.3, requiring use of LID practices and green infrastructure for development projects would ensure that projects include pervious surfaces in their design to minimize stormwater runoff. In addition, the majority of the flood control channels within the City are concrete lined and not susceptible to scour or erosion (HCOC Exempt). For those channels (or washes) that are subject to potential erosion and scour, upstream hydromodification controls for projects draining to these channels would be required.

Adherence to these regulatory requirements would minimize the amount of stormwater runoff from new development and redevelopment in the City. Therefore, potential future development under the proposed project would not result in flooding on- or off-site, and impacts would be less than significant. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## Surface Runoff and Capacity of Storm Drain System

Development under the proposed General Plan Update may require improvements to the City's storm drainage system to accommodate runoff from project sites, as discussed in detail within

Section 3.19. This could include changes to existing locations of laterals, upsizing of storm drains, and additional catch basins, among other improvements. The construction of such improvements would be required to comply with the San Bernardino County's Comprehensive Storm Drain Plan # 3, 6 & 7. Development impact fees would also be collected to be used for capital improvement projects related to drainage based on the priority set by the City of San Bernardino Public Works and based on the consistency with the San Bernardino County Storm Drain Master Plan.

Additionally, as noted, projects would be required to prepare project-specific hydrology and hydraulic studies following the methodology in the San Bernardino County Hydrology Manual, as applicable to ensure that flows from project sites do not exceed the capacity of the storm drain systems. In compliance with the MS4 Permit and San Bernardino County Stormwater Program, new development projects would also be mandated to install stormwater treatment BMPs that retain the 2-year, 24-hour rainfall event (Santa Ana RWQCB 2013). Compliance with the MS4 Permit and SBMC Chapter 8.80 requirements, including preparation of a SWQMP would also ensure that projects do not result discharge polluted runoff. General Plan Update Policies S-3.4 and S-3.5 would also ensure that new development is adequately served by storm drainage systems and that these systems are designed to accommodate 100-year storm flows.

Although the proposed project would result in an increase in impervious surfaces and potentially increase surface runoff, compliance with the appliable regulations would ensure that flows from project sites do not exceed the capacity of storm drainage systems in the City. Therefore, impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Flood Flows

As shown in Figure 3.10-2, there are 100-year and 500-year flood zones throughout the City. FEMA periodically updates its FIRMs to incorporate improved topographic data, updated hydrologic and hydraulic modeling, and revised flood risk information. As a result, floodplain boundaries may shift between map versions. These updates do not necessarily indicate an increase in flood risk but reflect improved mapping accuracy. Future development under the General Plan Update would be required to comply with applicable flood hazard regulations and policies based on the most current FEMA mapping. For example, any developments proposed within a FEMA floodway would likely include processing a Conditional Letter of Map Revision or a Letter of Map Revision (LOMR). A LOMR officially revises the FIRM to reflect changes in floodplains, floodways, or flood elevations due to completed projects. All drainage facilities would be sized in accordance with proper flood control requirements.

Additionally, development in SFHAs would be subject to the requirements of Section 8.79 of the SBMC which requires specific documentation, building, and inspection measures. Development within the City's Flood Plain Overlay Zone would also be subject to the requirements in

proposed Dev Code Update Section 19-02.02.060 C. General Plan Update Policies S-3.1, S-3.2, and S-3.6 would also help to avoid or minimize flooding impacts. Therefore, the proposed General Plan Update would result in **less than significant impacts** with respect to impeding or redirecting flood flows.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Development under the DTSP would largely be subject to the same regulatory requirements as development within the rest of the General Plan Update Area, which would reduce impacts related to erosion and siltation, surface runoff and flood flows, and stormwater drainage systems. Much of the DTSP Area is currently developed with impervious surfaces. As such, drainage patterns would largely be maintained and utilize the existing drainage facilities within the public right-of-way. Current runoff is captured and conveyed by existing storm drain infrastructure. Under the proposed conditions, overall drainage patterns, flow rates, and flow volumes would be maintained based on the high level of impervious condition under the existing condition and would not substantially increase the opportunity for erosion or scour downstream.

Like development under the General Plan Update, development under the DTSP would involve construction activities that could increase the potential for erosion and/or siltation. However, none of the future development projects would alter the course of an existing stream or river. Standard erosion control measures would be implemented as part of the SWPPP for any future project to minimize the risk of erosion or sedimentation during construction. The SWPPP must include an erosion control plan that prescribes measures such as phasing grading, limiting areas of disturbance, designating restricted-entry zones, diverting runoff disturbed areas, outlet protection, and provisions for revegetation or mulching. The erosion control plan would also include treatment measures to trap sediment, including inlet protection, straw bale barriers, straw mulching, straw wattles, silt fencing, check dams, terracing, and siltation or sediment ponds.

Additionally, hydromodification requirements and standard flood control requirements for new development would minimize impacts of potential increased flows and volumes on downstream receiving waters. Onsite storm drain systems would likely change with individual project components but would still utilize the existing City facilities within the public right-of-way. The proposed land uses within future redevelopment areas of the DTSP would not substantially increase surface water peak flows or volumes over the existing conditions and would likely result in reduced discharges due to onsite water quality and LID features, such as bio-swales, silt fencing, and berms.

Where there is potential to increase storm runoff, the City would require new development or significant redevelopment projects to complete drainage and hydrology analyses to ensure that on- and off-site drainage facilities can accommodate potential increased stormwater flows. Implementation of these provisions, which would include LID design, BMPs, and possibly onsite retention basins, would minimize increases in peak flow rates or runoff volumes. All new development or significant redevelopment project applicants would also be required to prepare a SWQMPs for submittal for the City that describes the BMPs and site features that would be implemented to minimize storm runoff from the sites.

The entirety of the DTSP Area is identified as an area of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood (Zone X). Additionally, as noted, future BMPs and project design features would reduce impacts from on- and offsite flooding. Overall, impacts with respect to drainage and hydrology in the DTSP Area would be **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

### Flood Hazard

As described in Impact c), portions of the city are in the 100-year and 500-year floodplains. All development in these areas would require conformance with FEMA requirements and setbacks to adequately protect structures from flood hazards. Future development within the 100-year flood zones would also be subject to the floodplain requirements in SBMC Chapter 8.79, which requires new construction to be built above the base flood elevation or be designed to mitigate flooding impacts. Upon completion of a structure in an SFHA, the building must be certified by a registered civil engineer and verified by the community building inspector and City Floodplain Administrator. In general, the standards of construction include provisions for flood risk reduction, including anchoring and flood-resistant materials and construction methods, with the lowest floors elevated at or one foot above the base flood elevation. The City does not allow structures to be built within floodways, i.e., the drainage area necessary for a 100-year floodplain. Development within the City's Flood Plain Hazard Overlay per proposed Dev Code Update Section 19-02.02.060 C, would also be required to subject to special building and inspection requirements.

Additionally, compliance with flood hazard-related the General Plan Update, as shown in Table 3.10-4, would reduce flood hazard impacts for future development. Compliance with FEMA's National Flood Insurance Program, SBMC and Dev Code requirements, and proposed General

Plan Update policies would reduce potential flood hazards and ensure that pollutants are not released during flood inundation. Impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Tsunami

The City is located approximately 100 miles inland of the Pacific Ocean and is not subject to tsunami inundation hazards. In addition, regional topography provides substantial physical barriers that prevent tsunami waves from reaching the City. Impacts with respect to tsunami hazards **no impact would occur**.

**Significance without Mitigation: No impact.**

## Seiche

There are no large natural water bodies within or adjacent to the City that could generate a seiche during seismic activity. Existing reservoirs and aboveground storage tanks are enclosed and engineered to prevent sloshing or overflow, minimizing any potential for seiche-related impacts. With respect to seiche zones, **no impact would occur.**

**Significance without Mitigation:** No impact.

## Dam Inundation

As shown in Figure 3.10-3, a large portion of southeastern portion of the City is within the inundation area of the Seven Oaks Dam, which under failure conditions, could cause severe flooding along the Santa Ana River. Since this dam acts as a flood control feature, it is usually dry and rarely approaches a third of the total capacity. Additionally, the DWR reports that the condition of the dam is satisfactory and that the probability of dam failure is very low (DWR 2025d). Several smaller portions in the northern and western areas of the City are also within the inundation areas of smaller dams and reservoirs. Each of these facilities are reported to be in satisfactory condition (DWR 2025d).

Dam owners are required to maintain emergency action plans that include procedures for damage assessment and emergency warnings. An EAP identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. EAPs contain procedures and information that instruct dam owners to issue early warning and notification messages to downstream emergency management authorities, such as the San Bernardino Fire Department. Because the likelihood of dam or debris basin failure is low and emergency response and notification procedures are in place, the potential for the release of pollutants due to inundation is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is not within a flood hazard zone. As shown in Figure 3.10-3, the DTSP Area is within the inundation area of the Seven Oaks Dam and would be subject to inundation hazards in the event of failure. While failure of this dam is unlikely, emergency action plans are in place to ensure safe evacuation of potentially affected areas. Tsunami and seiche hazards, like under the General Plan Update, would not affect the DTSP Area. Overall inundation impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

### e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As noted in Impact b), the City's groundwater supplies are extracted from the Bunker Hill Basin, which is adjudicated and managed by the Western-San Bernardino Watermaster. The Bunker Hill Basin is exempt from legislative requirements under the SGMA because it is an adjudicated basin and is not required to prepare a groundwater sustainability plan (DWR 2025b). As concluded in Impact b), the proposed General Plan Update would not impede sustainable management of the Bunker Hill Basin.

The City is within the Santa Ana River Basin which is subject to the water quality measures in the Santa Ana RWQCB's Basin Plan. During construction, adherence to the State Construction General Permit, implementation of a SWPPP, and compliance with project specific SWQMPs would ensure that surface water and groundwater quality are not adversely affected. During long-term operation, development under the General Plan Update would also be required to comply with the provisions in the Santa Ana RWQCB MS4 Permit and SBMC Section 8.80. The SWQMPs would identify BMPs for the prevention of stormwater pollution, including site design, source control, and treatment measures. Proposed General Plan Update policies relevant to reducing water quality impacts are shown in Table 3.10-3.

Through compliance with applicable regulatory requirements, the proposed General Plan Update would not conflict with or obstruct implementation of the Basin Plan or any groundwater management plan. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

Like development under the General Plan Update, future development under the DTSP would comply with existing regulations that ensure development does not impact water quality in the Santa Ana River Basin. For example, future development would be required to comply with the Statewide General Construction Permit and the Santa Ana RWQCB MS4 Permit, as well as the requirements in project-specific SWQMPs. Therefore, the DTSP would not impede sustainable groundwater management of the basin and impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.10.5 Cumulative Impact Analysis

The cumulative setting of water quality and hydrology impacts are the Santa Ana River Basin, specifically the Upper Santa Ana River Watershed, with respect to surface water impacts and the Bunker Hill Basin with respect to groundwater impacts.

**Would the project have a cumulative effect related to hydrology or water quality?**

### HYDROLOGY

Development in the City of San Bernardino under the General Plan Update and DTSP, in addition to other projects in these watersheds, would increase impervious areas, thus increasing runoff and flows into storm drainage systems. Within San Bernardino County, other projects would be required to prepare hydrology and hydraulic studies in accordance with the County Hydrology Manual and analyze stormwater flows from various storm recurrence intervals (e.g., 25-, 50-, and 100-year events) to ensure that the capacities of the storm drain systems are not exceeded. Additionally, other projects would be required to comply with MS4 permits applicable in those watersheds. The Santa Ana RWQCB MS4 permit applies to portions of three counties in the Santa Ana River Basin. Other projects' compliance with the requirements of the Santa Ana RWQCB MS4 permit, the San Bernardino County Stormwater Program, and San Bernardino County Hydrology Manual guidance would reduce cumulative impacts to hydrology and drainage to **less than significant** and would not be cumulatively considerable.

**Significance without Mitigation:** Less than significant.

### FLOODING

Projects within 100-year flood zones would be mandated to comply with National Flood Insurance Program and SBMC requirements. Cumulative impacts to hydrology, drainage, and flooding would be **less than significant**, and impacts of the proposed project would not be cumulatively considerable.

**Significance without Mitigation:** Less than significant.

### WATER QUALITY

Cumulative projects could also generate pollutants that would contaminate stormwater. Compliance with the MS4 permit includes implementation of site design and source control BMPs that reduce the potential for pollutants to enter runoff and treatment control BMPs that remove pollutants from stormwater. Cumulative water quality impacts would be **less than significant** after compliance with such permits, and project impacts would not be cumulatively considerable.

**Significance without Mitigation:** Less than significant.

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# 3.11 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to land use in the City of San Bernardino from implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project."

Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this DEIR.

## 3.11.1 Regulatory Framework

### STATE

### State Planning and Zoning Law and California Complete Streets Act

State Planning and Zoning Law (California Government Code Section 65300) requires every city in California to adopt a comprehensive, long-term general plan for the physical development of the city. A general plan should consist of an integrated and internally consistent set of goals and policies that are grouped by topic into a set of elements and are guided by a citywide vision. State law requires that a general plan address eight required elements (land use, circulation, housing, conservation, open space, noise, safety, and environmental justice), but allows some discretion on the arrangement and content. Additionally, each of the specific and applicable requirements in state planning and zoning law should be examined to determine if there are environmental issues within the community that the general plan should address, including, but not limited to, hazards and flooding.

Additionally, on September 30, 2008, Assembly Bill (AB) 1358, the California Complete Streets Act, was signed into law, becoming effective January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of the general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

California Government Code Chapter 18.39 (Specific Plans) provides authority for a city/county to adopt a specific plan by ordinance (as a regulatory plan) or resolution (as a policy). When a specific plan is adopted by ordinance, the specific plan effectively replaces a portion or all the current zoning regulations for specified parcels. It becomes an independent set of zoning

regulations that provide clear direction to the type and intensity of uses permitted or define other types of design and permitting criteria.

## REGIONAL

### Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the nation's largest metropolitan planning organization (MPO), representing 6 counties, 191 cities, and more than 19 million residents. SCAG undertakes a variant of planning and policy initiatives to encourage a more sustainable Southern California. The SCAG region includes the county of San Bernardino and the City of San Bernardino. SCAG is a regional council whose purpose is to create a more sustainable Southern California through planning and policy initiatives.

#### *Regional Transportation Plan/Sustainable Community Strategy*

As part of the Regional Transportation Planning (RTP) process that occurs every 4 years, SCAG is responsible for determining the growth in housing, employment, and population across the region and for identifying efficient and effective methods to accommodate that growth as demographic, economic, and policy circumstances change. On April 4, 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal 2024").

### San Bernardino Council of Governments (SBCOG)

SBCOG is an association of local governments in the San Bernardino County region. SBCOG partners with twenty-four cities in its jurisdiction including the City of San Bernardino. SBCOG provides transportation and sustainability planning for the region as well as serves as a collective voice on regional issues.

## LOCAL

### City of San Bernardino General Plan

The City of San Bernardino General Plan is a comprehensive plan which guides the future actions of the community. Chapter 2 of the City's 2005 General Plan provides goals and policies specifically for the City's intended land uses.

#### *City of San Bernardino General Plan's Strategic Areas*

The City of San Bernardino General Plan's land use designation system is organized in a three-tier hierarchy: Foundation Component Plan, General Plan Land Use, and Strategic Areas. Strategic Areas are selected areas of the city where change is either imminent and needs guidance or is desired and needs guidance and/or stimulation. The City of San Bernardino

General Plan designates the San Bernardino's Downtown is a strategic area (General Plan, pg. 2-66) thus will have tailored policy guidance to address specific needs and issues.

### San Bernardino Development Code

Article II, Zones, and Article III, General Regulations, of the City's existing Development Code (Title 19 of the Municipal Code) serve as the implementation component of the General Plan to ensure the orderly development of the city and to protect, promote, and enhance the public health, safety, and general welfare. The Zoning Ordinance establishes standards and procedures for development in each zoning district, including height, setback, housing density, yard, parking, walls, landscaping, and land use standards.

## 3.11.2 Existing Conditions

### CITYWIDE AREA

The City of San Bernardino is home to a wide variety of urban, suburban, and rural development patterns, offering a mix of residential neighborhoods, commercial corridors and centers, industrial districts, civic and educational facilities, parklands, and open spaces. Table 2-1, *Existing Land Use by Acreage*, in Chapter 2, *Project Description*, categorizes land within the City by land use type.

### Existing Land Use Plan

The 2005 General Plan organizes the City's Land Use Plan into a three-tiered hierarchy. The first and most basic tier described in the 2005 General Plan is the *Foundation Component Plan*, which functions as the City's existing General Plan Land Use Diagram. It broadly describes the fundamental pattern, type, and distribution of uses allowed on each parcel of land. The acreages of each land use in the first tier of the City's existing Land Use Plan are shown in Table 2-2, *Existing Land Use Plan Acreages*, in Chapter 2. The second tier is titled the *General Plan Land Use Map* and functions as the land use plan that implements the City's Zoning Map and development regulations. Therefore, these designations correspond to the City's Development Code zoning designations. This tier of the 2005 General Plan's Land Use Plan is shown in Chapter 2, Figure 2-4, *2005 General Plan Land Use Plan*. The third tier of land use guidance includes the existing Strategic Areas within the city. The 2005 General Plan provides detailed policy guidance tailored to address unique issues in these areas.

### DOWNTOWN AREA

The DTSP Area covers an approximately 621-acre area of the City's downtown. Its northern and southern boundaries are at 8th Street and the railroad tracks to the south of Rialto Avenue, respectively. It is bounded to the east and west by Sierra Way and I-215. Land uses in the north and west of the DTSP Area consist of residential neighborhoods characterized by one- to three-

story single-family homes, duplexes, triplexes, and 4-plexes. To the west of the DTSP Area, I-215, the San Bernardino Depot Rail yard, and other industrial uses create a barrier between neighborhoods and commercial areas. The southern area of the DTSP Area is largely characterized by commercial and industrial centers. Much of the land in the east and central portions of the DTSP Area is developed with civic uses for government buildings.

As shown in Chapter 2, Figure 2-7, *Existing Land Uses in the Downtown Specific Plan Area*, the DTSP area is primarily designated and zoned with commercial uses. The Commercial Regional-Downtown (CR-2) designation encompasses a large portion of the area between 2nd Street and 7th Street, west of Arrowhead Avenue, while much of the land east of Sierra Way, west of Arrowhead Avenue and north Rialto Avenue, south of 2nd Street, is designated Commercial General (CG-1) and Commercial Office (CO). These areas also contain pockets of Residential Medium High-designated sites that are developed with existing multi-family and single-family housing. The northern portions of the DTSP area between 7th and 8th Streets are primarily designated Residential Medium. The acreages of existing land uses in the DTSP area are summarized in Table 2-6, *Existing Land Use Designations in the Downtown Specific Plan Area,* of Chapter 2.

## 3.11.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning land use and planning. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning land use and planning if it would:

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.

### METHODOLOGY

The evaluation of impacts related to land use and planning is based on a review of existing policies, plans, and regulations that guide development and growth in the City. Information obtained from these sources was reviewed and summarized to describe existing conditions and identify environmental effects based on the proposed project's consistency with the regulatory background presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the proposed project would comply with relevant federal, state, and local laws, ordinances, and regulations.

## 3.11.4 Project Impact Analysis

### a) Would the project physically divide an established community?

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The physical division of an established community typically refers to the construction of a physical feature or the removal of a means of access that would impair mobility within an existing community or between a community and outlying areas.

The proposed Land Use Plan focuses growth and development inward in the form of infill and intensification of vacant and underutilized properties within the City's existing urbanized areas, while preserving the uses and densities of its established residential neighborhoods and open spaces. Growth on the city's periphery, in its foothills and undeveloped lands, is limited to the uses and densities permitted by existing zoning. Primary growth under the proposed Land Use Plan would occur in the downtown, under the DTSP which concentrates new retail, office, government, and housing use in a pedestrian-oriented environment. Existing retail commercial centers with extensive surface parking and segments of commercial corridors would also be intensified with a mix of expanded commercial and new housing development to evolve as key activity centers and destinations for the community and surrounding neighborhoods. Chapter 2, Figure 2-6, *General Plan Update Growth Areas*, identifies these commercial and mixed use corridors and centers where this growth is expected to occur, in addition to nine Strategic Areas that have additional policy guidance in the proposed Land Use Plan.

Additionally, the proposed General Plan Update would maintain the existing roadway patterns and would not include any new major roadways or other physical features through existing neighborhoods that would create new physical barriers in the General Plan Update Area.

While the proposed General Plan Update and Development Code do not prohibit development opportunities outside of infill locations, it does require the City to ensure that growth and change serve community needs and protect the environment. The Land Use and Urban Form Element of the proposed General Plan Update contains goals, policies, and actions that require local planning and development decisions to consider impacts on growth and development. Table 3.11-1, *Land Use: Proposed General Plan Update Policies,* show all the policies and actions that would minimize impacts related to land use development and growth.

## Table 3.11-1 Land Use: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-1.1 | **Distinct places**. Maintain and facilitate the development of districts, neighborhoods, open spaces, and other places that are linked but differentiated by use, form, density, and character. |
| LU-1.2 | **Complete neighborhoods**. Maintain, strengthen, and create complete neighborhoods with parks, schools, and community facilities and a mix of housing types, and ensure their connection to neighborhood-serving businesses, trails, and transit. |
| LU-1.3 | **Development concentrated in nodes along corridors**. As a means to revitalize corridors, consolidate land uses along commercial corridors by creating major and minor nodes that concentrate commercial and residential uses. |
| LU-1.4 | **Neighborhood centers**. Establish neighborhood-serving centers that provide uses meeting the daily needs of residents such as grocery stores, local-serving restaurants, and service businesses and are located within safe walking distance of residents. |
| LU-1.5 | **Transit-oriented places**. Facilitate development of residential, commercial, and office uses near rail and bus rapid transit stations, differentiated from surrounding areas by higher densities/intensities, options for station access, development standards, and gathering spaces. |
| LU-1.6 | **District placemaking**. Create distinct pedestrian-active districts (e.g., Downtown, Santa Fe Depot, Entertainment District, and Mount Vernon) by distinguishing land uses, orienting buildings around plazas and open spaces, and incorporating street landscaping and amenities. |
| LU-2.1 | **City gateways.** Strengthen the sense of arrival into San Bernardino, neighborhoods, and districts with gateways that include neighborhood-appropriate signage, monuments, and other themed design elements at locations such as those illustrate in Figure LU-4. |
| LU-2.3 | **Pedestrian environment.** Establish and create a network of attractive, pedestrian-oriented, human-scale streets, civic spaces, paseos, and public gathering places throughout the city that are accessible, walkable, and inviting for all ages and abilities. |
| LU-2.5 | **Sustainable design in the public realm**. Encourage the use of sustainable design features, including sustainable building and construction materials, permeable paving where feasible, drought-tolerant landscaping, and green infrastructure that reduce the urban heat island effect. |
| LU-3.2 | **Building design standards**. Establish and implement objective design standards to facilitate the development of housing, mixed-use buildings, commercial and industrial uses, and other desired uses with innovative design techniques and evolving technologies. |
| LU-3.3 | **Building designs and sites near freeways and rail.** Require physical design elements in new construction and rehabilitation of buildings to protect the public from the adverse effects of vehicle-generated air emissions, noise, and vibration from freeways and rail. |
| LU-3.6 | **Location-specific design guidelines**. Develop location-specific design guidelines that reinforce the character of a district or neighborhood, such as the downtown, Santa Fe |

## Table 3.11-1 Land Use: Proposed General Plan Update Policies

| Land Use and Urban Form Element | |
|---|---|
| | Depot area, Mount Vernon neighborhood, or other areas that merit location-specific design guidance. |
| LU-4.4 | **Compliance with environmental laws.** Require and work with appropriate regulatory agencies to ensure business activities remain in compliance with relevant environmental laws with respect to noise, odor, emission of pollution, waste transfer, fire safety, and so forth. |
| LU-4.6 | **Capital improvements.** Continue to provide resources necessary to maintain the City's built environment in exemplary condition, including public right-of-way and other capital improvements, as articulated in the Public Facilities and Services Element. |
| LU-5.1 | **Development review and entitlement**.. Ensure existing and proposed land uses standards and regulations in the Municipal Code, including building codes, development standards, and nuisance codes are adhered to through development review entitlement process. |
| LU- 5.2 | **Land use transitions.** To the extent feasible, require new development along major thoroughfares and at the edges of commercial centers adjoining low-scale residential neighborhoods to be located and scaled to provide transitions in building height and bulk, consistent with their character. |
| LU- 5.3 | **Mitigation of impacts of differing land uses**. As a condition of project approval, require new land uses and projects to mitigate potential impacts on existing land uses where significant adverse impacts could result due to their purpose and proposed operations. |
| LU-5.5 | **Environmental land uses.** Require technical studies when reviewing new developments to ensure that they do not impose unacceptable levels of noise, air pollution, traffic, dust, vibration, odors, or other detrimental impacts on nearby sensitive land uses. |
| LU-5.6 | **Reducing impacts from existing incompatible uses.** Where existing land uses that have been approved and built adversely impact adjacent sensitive uses, work with affected parties to seek funding and develop creative ways to reduce negative impacts on sensitive land uses. |
| LU-6.1 | **Urban form to reduce GHG emissions**. Promote residential, commercial, and industrial development within urbanized areas that is compact, pedestrian friendly, and served by transportation options along major corridors and in key activity areas. |
| LU-6.2 | **Adaptive reuse of buildings for sustainability**. Encourage the adaptive reuse of existing structures, buildings, and improvements to minimize water and energy use, capitalizing on a building's embodied energy, and supporting environmental sustainability. |
| LU-6.3 | **Net-zero buildings**. Encourage new or expanded commercial and industrial projects exceeding 100,000 square feet of gross floor area, such as big-box stores, warehouses, distribution centers, and similar uses, to set a goal to achieve net zero energy and water uses. |
| LU-6.4 | **Measures to reduce GHG emissions from buildings.** Encourage incorporation of measures to reduce or eliminate preventable GHG emissions in new projects exceeding 100,000 square feet of gross floor area. Measures may include, but are not limited to: |

### Table 3.11-1 Land Use: Proposed General Plan Update Policies

| Land Use and Urban Form Element | |
|---|---|
| | ▪ Reducing on-site energy consumption.<br>▪ Increasing on-site energy generation and storage.<br>▪ Supporting renewable energy projects in the city.<br>Reducing vehicle trips and waste generation. |
| LU-6.5 | **Transportation measures to reduce GHG emissions.** Implement multi-modal transportation improvements, transportation demand management programs, and encourage use of mass transit, car-pooling, ridesharing, and telecommuting in accordance with policy and program guidance in the Circulation Element. |
| LU-6.6 | **Sustainable landscapes**. Require new development projects to use and encourage existing development to retrofit properties to use low impact landscaping techniques that enhance habitat quality, reduce water use, support a diverse ecosystem, and increase resilience to a changing climate. |
| LU-6.7 | **Heat island mitigation**. Require private development to incorporate measures that are intended to materially reduce the heat island effect and promote climate resiliency through measures such as:<br>▪ Planting trees and landscaping.<br>▪ Installing green or cool roofs.<br>▪ Increased tree canopy in parking lots.<br>▪ Cooler permeable pavements.<br>▪ Orienting buildings for passive cooling. |
| LU-6.8 | **Plant and maintain an urban forest.** Significantly increase the City's urban forest for its aesthetic, heat mitigation, and air quality benefits, including, but not limited to the following measures:<br>▪ Require new development to plant street trees on site and along the adjacent roadway.<br>▪ Seek to use creative strategies to preserve and nurture mature trees in existing development.<br>▪ Prioritize, to the extent possible, tree species that maximize air quality and shade benefits. |
| LU-6.9 | **Alternative energy generation sources.** Promote and facilitate technologies that reduce the burning of fossil fuels and their deleterious impact on the environment. Examples include, but are not limited to:<br>▪ Alternative (non-fossil fuel) fueling stations and power sources for autos and trucks.<br>▪ Alternative energy sources, including hydroelectricity, solar, and wind to the extent feasible.<br>▪ Emergent zero emission technology for trains and mass transit alternatives**.** |
| LU-7.1 | **Conform development with natural setting**. Locate and design development within the City's hillsides and open spaces to preserve natural features, habitat, and wildlife corridors and to retain the character and aesthetic value of the natural landform. |

### Table 3.11-1 Land Use: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-7.5 | **Environmental protection**. Prohibit development practices, land uses, and unauthorized operations that degrade the quality of the City's natural environment and natural habitats; seek enforcement actions as needed to obtain cessation of activities and restore damages. |
| LU- 8.1 | **Foundation for accommodating growth.** Accommodate growth that aligns with community values, that complements the scale and character of City neighborhoods, business districts, and environment, and that is consistent with the categories and standards of land uses depicted on the Land Use Map (Figure LU-1). |
| LU-8.2 | **Infrastructure supporting development and services.** Coordinate the location and timing of new development and redevelopment of existing properties to ensure that the capacities of infrastructure, public facilities, and services are sufficient to meet their needs concurrent with the completion of new development. |
| LU-8.3 | **Distinct identities of districts**. Establish and maintain distinct identities for activity centers, neighborhoods, corridors, and districts to reflect their location, history and culture, mix of uses, and targeted markets, differentiating these by use, scale and form. |
| LU-8.4 | **Focused development.** Focus growth and development in downtown, along commercial corridors, in commercial and mixed-use centers, adjoining transit corridors/ stations and near major community anchors such as Orange Show/ stadium and California State University. |
| LU-8.5 | **Transit-oriented development.** Plan for transit-oriented development by encouraging future development activity within 1/2 mile of the sbX line, primary transit corridors, and major activity/employment centers, including Downtown San Bernardino. |
| LU-8.6 | **Balanced land uses.** Maintain a balance mix of land use designations that allows for the full range of housing, commerce, services, and institutional needs required for San Bernardino to be a community of choice; amend the Land Use Plan as necessary to achieve this objective. |
| LU-8.7 | **Fiscal impacts of growth.** Require developers seeking land use changes for their projects to prepare a fiscal impact analysis to identify the proportional level of services needed to support their projects via impact fees, assessments, improvements, and so forth. |
| LU-9.1 | **Housing development capacity**. Continuously provide, through the Land Use Element, sufficient residential development capacity to accommodate a range of housing types that are affordable; adhere to the density requirements for sites in the Housing Element to address the Regional Housing Needs Allocation. |
| LU-9.2 | **Complete neighborhoods**. Enable the development of neighborhoods that contain land uses meeting residents' day-to-day needs. These include a mix of housing types, parks, schools, childcare, community centers, religious facilities, and other uses that contribute to quality of life. |

### Table 3.11-1 Land Use: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-9.3 | **Diversity of housing**. Encourage the development of a wide range of housing types that serve varying household needs, including, but not limited to, single-family units, accessory dwellings, duplexes, triplexes, courtyard housing, and apartments. |
| LU-9.7 | **Housing compatibility**. Require new projects to be well integrated into neighborhoods, with smooth transitions in scale, form, density, and character, especially in transitional areas between single- and multi-family housing consistent with City objective design standards. |
| LU-9.8 | **Compatible uses near homes and in neighborhoods**. Require new development with potentially adverse impacts on neighborhoods or residents, such as noise, traffic, emissions, and stormwater runoff, be located and designed so that quality of life and safety are preserved. |
| LU-9.9 | **Active neighborhoods.** Require that neighborhoods include adequate public and private open space, recreational uses and opportunities, sidewalks, parkways, street trees, and landscaping that improve aesthetics and promote healthy living. |
| LU-9.10 | **Neighborhood associations.** Work with neighborhood associations throughout San Bernardino to facilitate community building and neighborhood identity, provide for an acceptable level of public safety, and provide a unified voice to City decisionmakers about local needs. |
| LU-9.11 | **Supporting neighborhood-oriented uses**. Allow for limited neighborhood-supportive retail, commercial, and service uses within or adjacent to residential neighborhoods on collector and arterial street types to serve the needs of the immediate neighborhood. |
| LU-10.1 | **Priority Land Uses.** Allow for a full range of commercial activities that meet the daily needs of residents and business, including grocery stores, personal services, entertainment, office, restaurants, medical services, clothing, home furnishing, and others. |
| LU-10.2 | **Neighborhood-serving retail.** Provide for development of quality neighborhood retail and service centers within reasonable walking, biking, or short driving distance of residential neighborhoods and employment centers where such uses are economically feasible. |
| LU-10.10 | **Mixed-use development**. Enable development of housing integrated with commercial and/or office uses on properties; allow for flexibility in how mixed uses are physically arranged—into single use buildings, vertically integrated in the same building, or arranged horizontally in separate buildings on the same or adjacent parcel. |
| LU-10.11 | **Commercial and housing compatibility**. Require buildings and sites that integrate nonresidential uses with housing to ensure compatibility among uses, addressing issues of parking, odors, traffic, noise, and other issues that affect the livability viability of both uses |
| LU-10.12 | **Transitions with residential neighborhoods**. Require that development projects in commercial and mixed-use corridors and centers are designed to ensure transitions in density and scale, and avoidance of impacts on adjoining residential neighborhoods |

**Table 3.11-1 Land Use: Proposed General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-12.1 | **Integrate infrastructure with community setting.** Sensitively integrate regional and local-supporting infrastructure into San Bernardino's neighborhoods, commercial and industrial districts, and corridors. |
| LU-13.1 | **Priority Land Uses.** Accommodate a full range of public facilities that include, but are not limited to: schools, government, fire and police facilities, utility, and institutional uses that serve the needs of residents and business in accordance with applicable land use designations, design standards, and development policy. |

Therefore, because no physical features or the removal of a means of access that would impair mobility within an existing community or between a community and outlying areas would occur with implementation of the proposed General Plan Update, the physical division of an established community would not occur and thus, **no impact** would occur.

**Significance without Mitigation:** No impact.

## DOWNTOWN SPECIFIC PLAN

The aim of the DTSP is to provide new housing and employment opportunities in the DTSP Area while increasing pedestrian connectivity and access to transit. However, it is anticipated to result in substantial redevelopment of the existing uses in the DTSP Area to achieve this vision. While redevelopment would occur, the DTSP proposes no actions that would physically divide and instead proposes improvements to the accessibility of transportation facilities for non-motorized uses, which would improve connectivity for existing uses in the DTSP Area. Development under the DTSP would also occur incrementally and largely integrate into the existing community. As noted above, several policies under the General Plan Update would ensure that existing and future development is compatible. Additionally, Table 3.11-2, *Downtown Land Use: Proposed General Plan Update Policies*, lists the policies specifically targeted for the DTSP Area.

### Table 3.11-2 Downtown Land Use: Proposed General Plan Update Policies

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-14.1 | **Downtown reinforced as the focus of community and regional identity.** Build upon downtown's historic role as the civic and cultural center of the City and region, distinguishing it as a unique place through its land uses, density, physical form, character, architecture, and activities as guided by the Downtown Specific Plan. |
| LU-14.2 | **Placemaking Improvements**. Create a sustainable and vibrant mixed-use district that includes a network of connected streets, parks, walkways, and street-level storefront commerce, and plazas that offers an active environment and a sense of security and safety. |
| LU-14.3 | **Priority Land Use Streamlining**. Streamline approval of uses consistent with the Downtown Specific Plan (DTSP), ensuring that projects consistent with the DTSP are moved efficiently through the review and approval process using all available streamlining methods. |
| LU-14.4 | **Contributors to Downtown's identity and economy**. Support programs and projects that enhance creative arts and culture, protect historic and other significant buildings, and create parks and dynamic public places as significant components of Downtown's ecosystem. |
| LU-14.5 | **Mobility alternatives.** Support pedestrian- and transit-oriented mobility by encouraging the replacement of surface lots with structured parking, leveraging access to rail and bus transit, and providing sufficient building densities and land uses within walking distance. |
| LU-14.6 | **Landscape and parks**. Ensure that the Downtown is revitalized with a coordinated series of parks, walkways, greenways, and landscaping that are integrated with development and along streetscapes where feasible, contributing to the Downtown's vitality and livability. |
| LU-14.7 | **Linkage to adjoining districts and activity centers**. Establish and maintain pedestrian and transit linkages to adjoining neighborhoods, districts, and destinations including the Transit Center, Downtown Gateway, San Manuel Stadium, and the National Orange Show. |
| LU-15.1 | **Defining the entry to Downtown San Bernardino.** Establish a well-defined entry to the Downtown from the north and incentivize transit use by concentrating development of commercial, office, housing, and mixed uses on lands adjoining the sbX transit corridor. |
| LU-15.2 | **Street-frontage design for development**. Orient buildings to the street frontage and design the ground floor of buildings to enhance pedestrian activity along the Downtown Gateway corridor. |
| LU-15.3 | **Pedestrian-oriented streetscapes**. Improve the streetscapes along the Downtown Gateway to create a quality and highly frequented walking environment and connectivity to transit portals, including a consistent and dense tree canopy to reduce the heat island effect. |
| LU-15.4 | **Transitions with adjoining uses**. With intensification of land uses along the Downtown Gateway, manage the height and orientation of mixed use and commercial buildings to transition with and prevent impacts upon the adjoining residential neighborhoods. |

No aspect of the DTSP would divide the existing City as the roadway network is fully established and developed, and all future development is likely to use the network, or modify it as appropriate while maintaining function. For example if a roadway is closed to vehicular traffic to support an plaza or event center, routes for access may still be provided for cyclists, transit, and pedestrians. While the extent and location of such a change would be subject to further review, the General Plan Update policies listed in Table 3.11-1 and 3.11-2 would help to prevent physical division of the community. Therefore, **no impact would occur.**

**Significance without Mitigation:** No impact.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

### Airport Land Use Plan

The proposed General Plan Update is consistent with the San Bernardino International Airport Land Use Plan (ALUP). Land use designations and policies in the General Plan Update ensure that development within areas surrounding the airport is compatible with airport operations, including adherence to safety zones, height restrictions, and noise exposure contours. As a result, implementation of the General Plan Update would not conflict with the ALUP, and potential impacts related to airport safety or noise exposure would be minimized. Additionally, Table 3.11-3, *Airport District Land Use: Proposed General Plan Update Policies*, lists the policies specifically targeted for the airport district.

**Table 3.11-3 Airport District Land Use: Proposed General Plan Update Policies**

| **Land Use and Urban Form Element** | |
|---|---|
| LU-18.1 | **Priority land uses**. Support projects on adjoining lands that are related to, support operations of, and facilitate access with the SBIA. Development proposals must be consistent with the SBIA Land Use Plan, Alliance California Specific Plan, and Airport Overlay District. |
| LU-18.2 | **Development standards**. Limit the type of development, population density, site coverage, and height of structures as specified in the applicable safety zones in the Comprehensive Land Use Plan for the SBIA and the Airport Overlay District of the Municipal Code. |
| LU-18.3 | **Connections and access**. Continue to support buildout of the internal and adjacent street network surrounding the airport in accordance with City street design specifications and the classifications in the Alliance California Specific Plan. |

**Table 3.11-3 Airport District Land Use: Proposed General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-18.4 | **Safety and noise**. Prohibit sensitive land uses on the airport property and within surrounding applicable areas, as noted in the Airport Overlay District, that cannot achieve the noise reduction, safety, or development standards of the Airport Overlay District. |
| LU-18.5 | **Airport land use plan**. Cooperate and work with the IVDA and SBIA to develop a long-term land plan for the San Bernardino International Airport that can serve as an Airport Land Use Compatibility Plan that is appropriate for a mixed cargo and passenger airport. |
| LU-18.6 | **Cleanup activities**. Continue to monitor and advocate for remaining cleanup activities at the Airport, including activities to address the newly identified contamination from per- and polyfluoroalkyl substances (PFAS), particularly in the former fire training area. |

Implementation of the General Plan Update would be consistent with the goals and requirements of applicable ALUP and would not conflict with their provisions. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## Habitat Conservation Plan

The General Plan Update Area is within or adjacent to several regional conservation efforts, including the Upper Santa Ana River Habitat Conservation Plan (Upper SAR HCP), the Upper Santa Ana River Wash Habitat Conservation Plan (Wash Plan), the San Bernardino County Regional Conservation Investment Strategy (RCIS), and the Colton West Valley HCP. These efforts establish conservation strategies for sensitive species and habitats across the region, guiding land use and development while promoting long-term ecological sustainability.

The General Plan Update includes policies and mitigation measures specifically designed to support habitat connectivity, species protection, and resource conservation. These include avoidance and minimization strategies for impacts to riparian habitat, wildlife corridors, and sensitive vegetation communities, as well as coordination with state and federal agencies during project-level review. Implementation of the General Plan Update would be consistent with the goals and requirements of applicable conservation plans and would not conflict with their provisions. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## SCAG Connect SoCal Consistency

SCAG's RTP/SCS is the primary plan that guides transportation and land use decisions on a regional level. While the RTP/SCS goals are intended to direct decisions made by SCAG, local land use plans and projects are encouraged to analyze consistency with the RTP/SCS to ensure that local and regional land use decisions are aligned. The proposed General Plan Update is intended to be consistent with SCAG's regional goals for land use and transportation. When compared to the existing 2005 General Plan, the General Plan Update's Land Use Plan would increase density and mixed-use development in the City and improve the City's jobs-housing ratio, as described in Section 3.14, *Population and Housing*. SCAG's RTP/SCS generally encourages land use choices and transportation improvements that would decrease vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions and increase accessibility and connectivity for all modes of transportation, while supporting regional and local economies. An analysis of the proposed project's consistency to the goals of the RTP/SCS is provided below in Table 3.11-3, *Proposed Project Consistency Analysis with RTP/SCS Goals.* The DTSP, which would be consistent with the land uses under the General Plan Update, is also included in this analysis.

**Table 3.11-4 Proposed Project Consistency Analysis with RTP/SCS Goals**

| Goals | Consistency Analysis |
|---|---|
| **Mobility:** Build and maintain an integrated multimodal transportation network. | |
| Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. | **Inconsistent**. Although the General Plan Update's Land Use Plan and policies align with the GHG reduction imperatives of the RTP/SCS, impacts associated with air quality, GHG and VMT would be significant and unavoidable due to the scale of development proposed under the proposed project and the programmatic level of this analysis, as discussed in Section 3.2, *Air Quality*, Section 3.8*, Greenhouse Gas Emissions*, and Section 3.17, *Transportation.* Therefore, the proposed project would not be consistent with this goal. |
| Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. | **Consistent**. Section 3.17 discusses transportation, mobility, and circulation policies that align with this RTP/SCS goal. |
| Support planning for people of all ages, abilities and backgrounds. | **Consistent**. The General Plan Update includes policies that support the health of its residents and ensure equitable access to resources, including Policies LUD-1.1 through LUD-1.7, LUD-9.9 and LUD-9.10, as shown in Table 3.11-1. Additional policies in Table 3.11-1 encourage compatibility between land uses to promote healthy lifestyles, active transportation, access to transit, new open space and |

### Table 3.11-4 Proposed Project Consistency Analysis with RTP/SCS Goals

| Goals | Consistency Analysis |
|---|---|
| | parkland opportunities, and bicycle and pedestrian connectivity to recreational amenities. Section 3.17 also discusses additional transportation, mobility, and circulation policies that align with this goal. |
| **Communities:** Develop, connect and sustain livable and thriving communities. | |
| Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. | **Consistent.** Section 3.17 discusses transportation, mobility, and circulation policies that align with this RTP/SCS goal. |
| Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households**.** | **Consistent**. The proposed Land Use Plan and DTSP supports a variety of housing types, including High Density Residential and mixed-use development to encourage better connectivity to employment and commercial uses. Policies LUD-1.1 through LUD-1.7 encourage a balanced land use pattern, a diversity of housing types, jobs-housing balance, and transit-oriented development. Therefore, the proposed project would be consistent with this policy. |
| **Environment:** Create a healthy region for the people of today and tomorrow. | |
| Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change**.** | **Inconsistent**. Although the General Plan Update's Land Use Plan and policies align with the GHG reduction imperatives of the RTP/SCS, impacts associated with air quality, GHG and VMT would be significant and unavoidable due to the scale of development proposed under the proposed project and the programmatic level of this analysis. Therefore, the proposed project would not be consistent with this goal. |
| Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emission and enable more sustainable use of energy and water. | **Inconsistent**. Section 3.17 discusses transportation, mobility, and circulation policies that align with this RTP/SCS goal. Although the General Plan Update's Land Use Plan and policies align with the GHG reduction goals of the RTP/SCS, General Plan Update and DTSP buildout would result in significant and unavoidable impacts with respect to air quality, GHG emissions, and VMT. Therefore, the proposed project is considered inconsistent with this RTP/SCS goal. |
| Conserve the region's resources. | **Consistent**. The General Update contains several policies in the Land Use and Urban Form Element and the Open Space and Conservation Element that would preserve and enhance areas that may provide habitat for special-status species (LU- |

**Table 3.11-4 Proposed Project Consistency Analysis with RTP/SCS Goals**

| Goals | Consistency Analysis |
|---|---|
| | 7.1, OSC-1.1, and OSC-4.4). Therefore, the proposed project would be consistent with this policy. |
| **Economy:** Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | |
| Improve access to jobs and educational resources. | **Consistent.** This RTP/SCS goal focuses on adopting policies and investments in regional infrastructure in support of improving regional economic development and competitiveness. Policies such as LUD-4.2, LUD-10.2, and LUD-12.2 encourage employment opportunities and infrastructure improvements. Therefore, the General Plan Update would not adversely affect the ability of SCAG to align plan investments and policies with economic development and competitiveness and would contribute to achieving this goal by advancing the other RTP/SCS goals. |
| Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. | **Consistent**. The General Plan Update includes policies that support the health of its residents and ensure equitable access to resources, including Policies LUD-1.1 through LU-D-1.7, LUD-9.9 and LUD-9.10, which encourage compatibility between land uses to promote healthy lifestyles, active transportation, access to transit, new open space and parkland opportunities, and bicycle and pedestrian connectivity to recreational amenities. |

Source: SCAG 2024

Implementation of the General Plan Update would result in a significant and unavoidable impact related to regional air quality, GHG emissions, and VMT. While the General Plan Update includes policies intended to promote infill development, multimodal transportation, and reduced automobile dependence, the level and geographic distribution of projected growth would result in increases in regional travel demand, mobile-source emissions, and overall VMT that cannot be fully mitigated. As a result, the General Plan Update would be inconsistent with applicable goals and objectives of the SCAG Connect SoCal RTP/SCS, which emphasize reducing VMT, improving air quality, and achieving regional GHG reduction targets. Therefore, impacts related to air quality, greenhouse gas emissions, and VMT would be **potentially significant**.

**Significance without Mitigation:** Potentially significant.

**Impact LU-1a: Implementation of the General Plan Update would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect.**

**Mitigation Measures**: Implement AIR-1, AIR-2, AIR-3, AIR-4, GHG-1 and GHG-2.

**Significance with Mitigation:** Significant and unavoidable.

There are no additional mitigation measures to fully reduce the General Plan Update's inconsistencies with the goals of SCAG's 2024–2050 RTP/SCS. As a result, future development under the General Plan Update would conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect and project impacts, and cumulative impacts, would be **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

### Airport Land Use Plan

The proposed General Plan Update, including the DTSP Area, is consistent with the San Bernardino International ALUP. Land uses within the DTSP area are located outside designated airport safety and noise zones, and no incompatible development is proposed that would conflict with airport operations. As a result, implementation of the DTSP under the General Plan Update would not conflict with the ALUP, and potential impacts related to airport safety or noise exposure would be minimal. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### Habitat Conservation Plan

The DTSP Area is highly urbanized and does not contain any designated critical habitat, sensitive biological resources, or areas covered by an adopted HCP or NCCP. Although the DTSP Area is within the service areas of several mitigation and conservation banks (e.g., Cajon Creek, Riverpark, and Soquel Canyon), the nature of existing development and limited habitat value within the DTSP boundaries means that future projects are unlikely to affect regional conservation objectives. Therefore, the DTSP would not conflict with any adopted HCP, NCCP, or other approved conservation plan, and impacts would be **less than significant**.

**Significance without Mitigation:** Less than significant.

### SCAG Connect SoCal Consistency

The primary vision under the DTSP is to transform the DTSP Area into a vibrant downtown area that capitalizes on the area's proximity to transit services. To achieve this vision, the DTSP would substantially increase the development capacity of the DTSP Area. Therefore, the policy and

land use vision of the DTSP is largely consistent with SCAG's RTP/SCS vision for improving transit access and density in Southern California. However, as described in Table 3.11-3, buildout of the DTSP would result in significant and unavoidable impacts related to regional air quality, GHG emissions and VMT. These are impacts on the programmatic level and individual projects under the DTSP may have less than significant impacts with respect to these topical areas. Nonetheless, these significant impacts conflict with the GHG emissions reduction goals in the RTP/SCS, therefore making land use plan consistency impacts, **potentially significant**.

**Significance without Mitigation:** Potentially significant.

**Impact LU-1b: Implementation of the DTSP would conflict with appliable plans adopted for the purpose of avoiding or mitigation of an environmental effect.**

**Mitigation Measures**: Implement AIR-1, AIR-2, AIR-3, AIR-4, GHG-1 and GHG-2.

**Significance with Mitigation: Significant and unavoidable.**

There are no additional feasible mitigation measures to fully reduce the DTSP's air quality, GHG emissions, and VMT impacts to less than significant, and therefore the DTSP's inconsistency with the goals of RTP/SCS cannot be mitigated to less than significant. As a result, impacts would be **significant and unavoidable**.

## 3.11.5 Cumulative Impact Analysis

The cumulative setting for land use and planning impacts is the region served by SCAG. Land use decisions in this area are generally regulated by individual agencies through their respective general plans, development codes, and other land use documents. Jurisdictional boundaries limit implementation of regional mitigation by any one city, and therefore, land use coordination on the regional level is facilitated by SCAG.

**Would the project have a cumulative effect related to land use?**

Future development associated with the proposed project includes dwelling units, residents, employment, and industry. This DEIR evaluates projected development, along with future development in surrounding municipalities, which will result in impacts to the region. The proposed project involves no actions that could physically divide a community, nor would cumulative development in the region directly result in projects that would divide a community. Cumulative development in the City and surrounding areas has the potential to increase exposure of people and structures to airport-related safety and noise hazards, as well as affect sensitive biological resources. However, because the proposed General Plan Update and Downtown Specific Plan are consistent with the San Bernardino International ALUP and applicable HCP, future development would be guided by established safety, noise, and

conservation standards, minimizing cumulative impacts related to airport operations and habitat conservation.

The total of this buildout facilitated by the proposed project has potential to combine with regional projected growth to conflict with SCAG's RTP/SCS goals that target improving air quality and reducing GHG emissions. Therefore, the proposed project's contribution to a cumulative effect would be **potentially significant** and **cumulatively considerable**.

**Impact LU-2: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in land use buildout that conflicts with a regional land use plan.**

**Significance with Mitigation: Significant and unavoidable**.

While air quality and GHG emissions mitigation measures would reduce these impacts to the extent possible, impacts to these topical areas would remain significant and unavoidable at the plan level. Therefore, impacts with respect to land use plan consistency would remain **significant and unavoidable**.

## 3.11.6 References

SCAG. 2024. The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments: Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf

# 3.12 MINERAL RESOURCES

This section outlines the regulatory framework governing mineral resources in the City of San Bernardino and assesses impacts related to the availability of mineral resources associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project." Minerals are naturally occurring chemical elements or compounds formed through inorganic processes, excluding organic substances. A minable mineral, or "ore deposit," refers to a concentration of minerals or ore with an economic value significantly exceeding the costs associated with exploration, extraction, processing, and site reclamation.

## STATE

### Surface Mining and Reclamation Act

California's Surface Mining and Reclamation Act of 1975, referred to as SMARA, was enacted to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. Requirements for SMARA are codified under Public Resources Code Sections 2710 et seq. Under state law, all mining operations are required to obtain permits prior to commencing operations and to abide by local and state operating requirements. Mining operations are also required to have appropriate reclamation plans in place, provide financial assurances, and abide by state and local environmental laws.

### Classification

The California Geological Survey's Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources per SMARA. Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt and dimension stone; and construction aggregate including sand, gravel, and crushed stone. Development generally results in a demand for minerals, especially construction aggregate. Urban preemption of prime deposits and conflicts between mining and other uses throughout California led to passage of the SMARA, which requires all cities and counties to incorporate in their General Plans the mapped designations approved by the State Mining and Geology Board. The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption). The P-C regional boundaries are modified to include only the portions of the region that are urbanized or urbanizing and are classified for their aggregate content. An aggregate appraisal further evaluates the presence or absence of significant sand, gravel, or stone deposits that are suitable sources of aggregate. The classification of these mineral

resources is a joint effort of the state and the local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the following four mineral resource zones (MRZ).

- **MRZ-1.** A mineral resource zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2.** A mineral resource zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence, and development should be controlled.
- **MRZ-3.** A mineral resource zone where the significance of mineral deposits cannot be determined from the available data.
- **MRZ-4.** A mineral resource zone where there is insufficient data to assign any other designation.

## 3.12.1 Existing Conditions

### CITYWIDE AREA

The City of San Bernardino lies on a broad, gently sloping lowland that flanks the southwest margin of the San Bernardino Mountains. The lowland is underlain by alluvial sediments eroded from bedrock in the adjacent mountains and washed by rivers and creeks into the valley region, where they have accumulated in layers of gravel, sand, silt and clay. Sediment accumulation has continued for a few million years, increasing the thickness of sediments, which have gradually buried the original hill and valley topography of the Bunker Hill-San Timoteo Basin. Shandin Hills and smaller hill areas in the basin are remnants of the original topography.

The San Bernardino Mountains, Shandin Hills, and other hilly areas made up of mostly Mesozoic and older crystalline basement terrain. Younger sedimentary deposits consist of late Pleistocene alluvium outcropping on the older alluvial fans northeast of the city and underlying the younger Holocene alluvium of the San Bernardino Valley. These younger sediments accumulated in alluvial fans and floodplain deposits. Alluvial fans that extend downslope from the mouths of the San Bernardino Mountain canyons consist of coarser grained and poorly sorted boulders, cobbles, gravels, sands, silts, and clays that decrease in size and abundance to the southwest. Floodplain deposits from the Santa Ana River and Cajon and Lytle Creeks in the vicinity of metropolitan San Bernardino consist mostly of sand, sandy silt, and silt. The alluvial fan and floodplain deposits interfinger and form highly variable and often laterally discontinuous layers of various sizes of alluvial materials.

In the San Bernardino City area, the bulk of construction aggregate is found in the natural sand and gravel deposits of Cajon Wash, Lytle Creek, Warm Creek, City Creek, and the Santa Ana River. Figure 3.12-1, *Mineral Resource Zones Map*, depicts the MRZs for the city and its SOI, as

classified in the 2008 Updated Mineral Land Classification Map (CDC 2008). The primary goal of mineral resource classification is to identify regionally significant mineral deposits and to conserve and develop them for anticipated aggregate production needs of the region. The State of California designates a large meandering swath of MRZ-2 area near the western and southern city boundaries. The MRZ-2 areas indicate the existence of construction aggregate deposits that meet certain State criteria for value and marketability based solely on geologic factors. After the State of California has designated the most valuable sand and gravel deposits (MRZ-2) along specific waterways like Cajon Wash and the Santa Ana River, the remainder of the city's land, meaning all areas outside of these prime resource zones is classified as MRZ-1, MRZ-3, or MRZ-4. These classifications indicate lands with no significant mineral deposits, deposits of undetermined significance, or deposits that are not considered regionally important. In short, once the key resource areas are mapped, the rest of the city is categorized under less critical mineral designations. By statute, the State Mining and Geology Board (SMGB) does not utilize "existing land uses" as a criterion in its classification of MRZs. This sometimes results in the classification of MRZs that are already developed and therefore unsuitable for mineral production. However, additional State studies in San Bernardino include the criteria of "existing land use." This helps identify resource sectors that contain aggregate resources which remain potentially available from a land use perspective. The regionally significant construction aggregate sectors in city planning areas are depicted in Figure 3.12-2, *Regionally Significant Aggregate Deposits*. Private land within the city limits that is part of the significant construction aggregate sectors is designated IE, Industrial Extractive, and IH, Industrial Heavy, to facilitate mineral resource development.

## DOWNTOWN AREA

The downtown area of San Bernardino lies within a region underlain by younger Holocene alluvial deposits, primarily consisting of sand, sandy silt, and silt deposited by the Santa Ana River and nearby creeks. Unlike the coarser alluvial fan deposits found closer to the San Bernardino Mountains, downtown's floodplain sediments are finer grained, reflecting their position further from the primary sediment sources. Though the city as a whole contains MRZ-2 areas with significant construction-grade aggregates, particularly near Cajon Wash and Lytle Creek, downtown itself is not a major source of extractable mineral resources. Instead, it is designated as MRZ-1, MRZ-3, or MRZ-4, indicating lower mineral potential due to urban development and finer sediment composition. The city's zoning for downtown prioritizes commercial, residential, and industrial uses rather than mineral extraction.

## 3.12.2 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form,** includes questions concerning mineral resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning mineral resources if it would:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

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

### METHODOLOGY

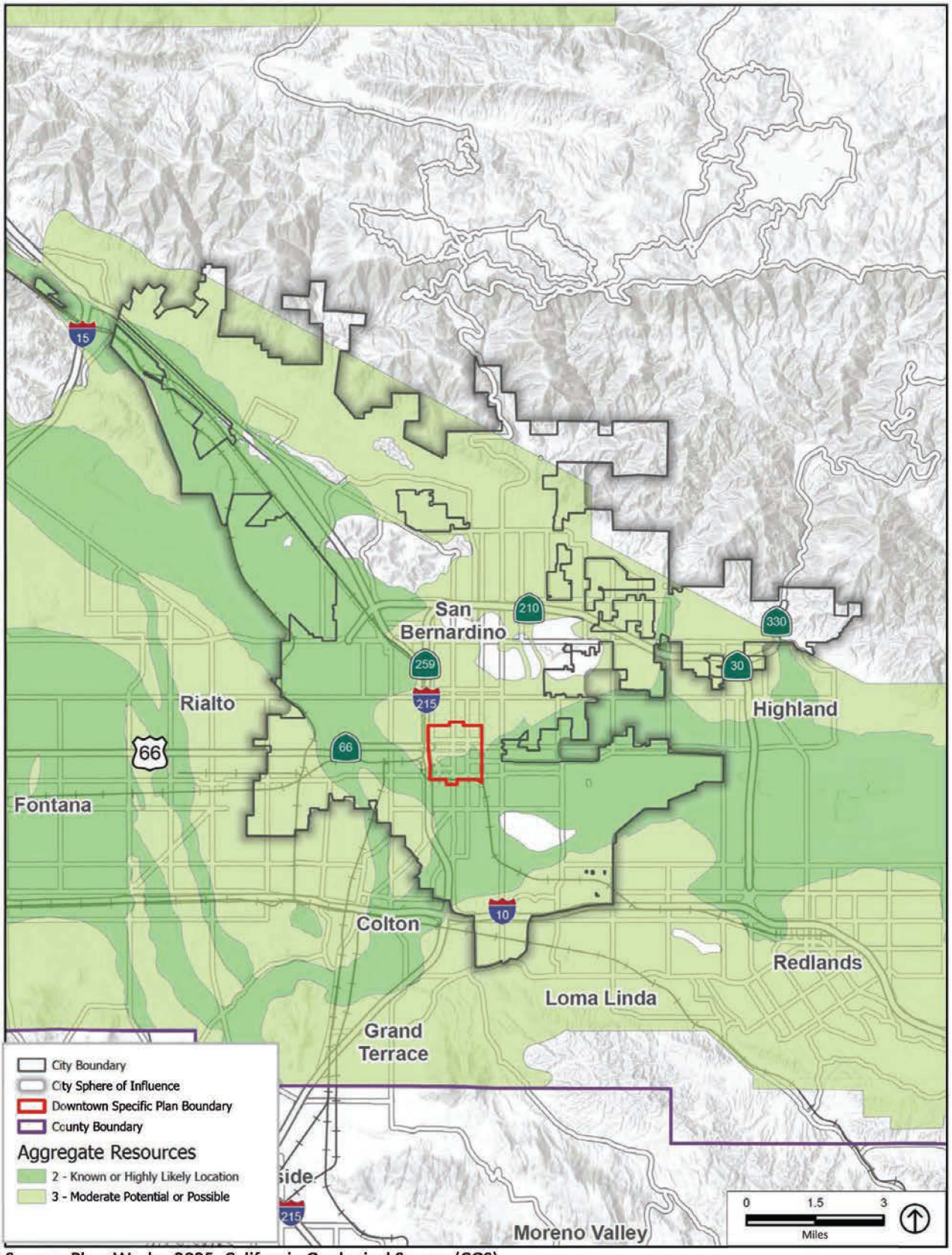
Impacts to mineral resources under the proposed General Plan Update and DTSP are evaluated by comparing the land uses under these plans to mineral resource information available from the CDC and USGS to determine whether the land uses proposed for areas containing important mineral resources would be incompatible with extraction uses. If areas that overlie important mineral resources do not allow for mineral resources to be extracted, development under the proposed project would be considered significant. However, if areas containing important mineral resources are already developed with incompatible uses, the proposed project is considered to result in loss of these resources.

## 3.12.3 Project Impact Analysis

**a) Would the proposed project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

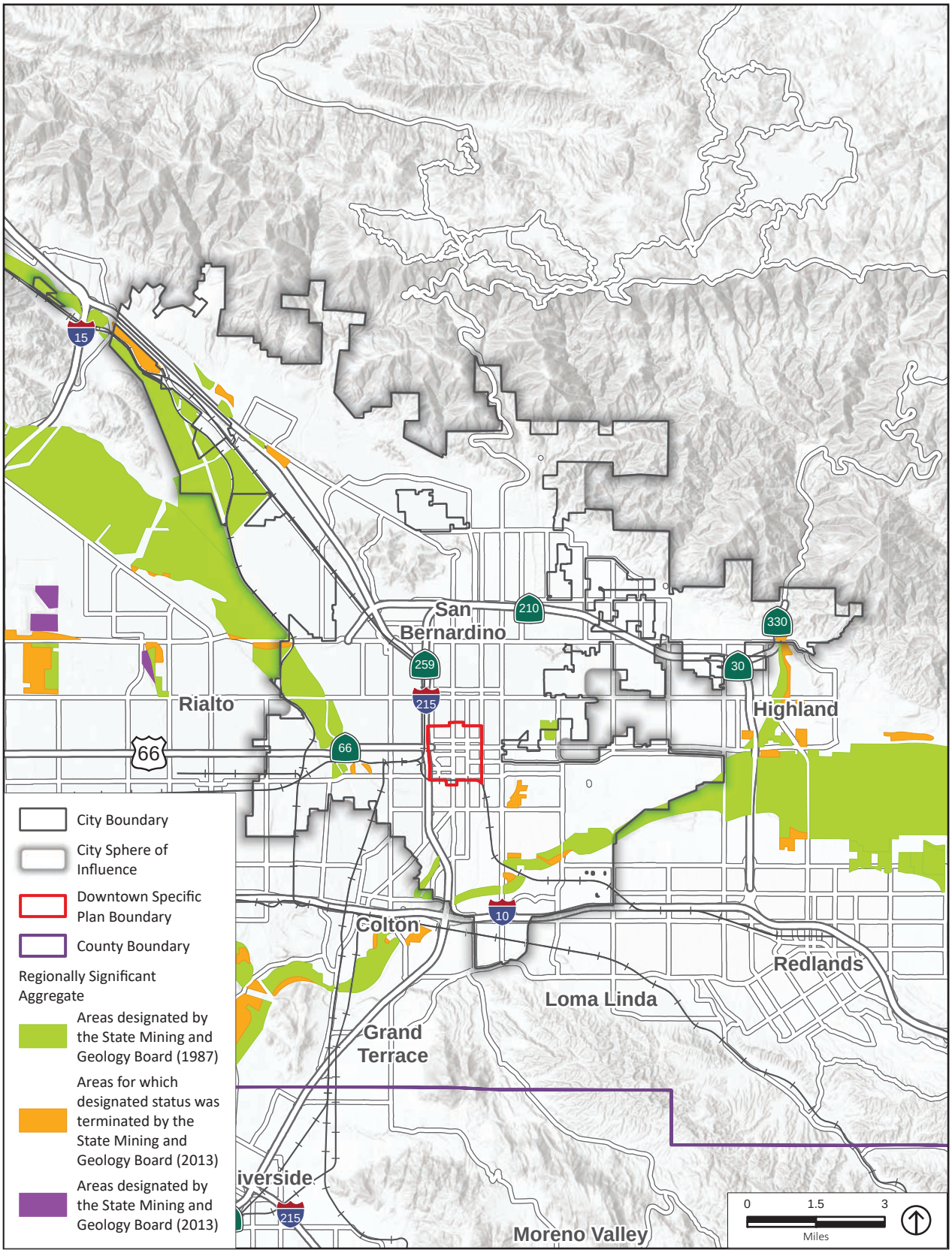
The City of San Bernardino contains regionally significant mineral resources, particularly in MRZ-2 zones near Cajon Wash, Lytle Creek, Warm Creek, and the Santa Ana River, where coarse alluvial deposits (gravel, cobbles, and sand) provide essential construction aggregates. State and local land use designations (such as IE-Industrial Extractive and IH-Industrial Heavy) already protect viable mineral extraction sites. Urbanized areas, including downtown and other developed zones, are not considered available for mining. Though the City has MRZ-2 designated areas, many of these areas are no longer suitable for mineral extraction because of existing development.




Source: PlaceWorks, 2025; California Geological Survey (CGS)

Figure 3.12-1
**Mineral Resource Zones Map**

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Source: PlaceWorks, 2025; SMGB Designation Report No. 14 State Mining and Geology Board 2017.

Figure 3.12-2
**Regionally Significant Aggregate Deposits**

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As illustrated in Figure 3.12-2, the City has regionally significant sources of aggregate mineral resources on the west and northwest edges of the city. Since the General Plan Update does not affect MRZ-2 zones or disrupt active or planned aggregate operations, it would not result in the loss of availability of a known mineral resource that would be of value to the region or the state. Table 3.12-1, *Preventing Mineral Loss: Proposed General Plan Update Policies,* show the policies and actions that would minimize impacts related to mineral resource loss. Policy OSC-6.1 specifically prohibits and restricts development of incompatible uses in areas defined as containing important mineral resources, ensuring that impacts are **less than significant**.

### Table 3.12-1 Preventing Mineral Loss: Proposed General Plan Update Policies

| **Open Space and Conservation Element** | |
|---|---|
| OSC-6.1* | **Mineral Resources Protection.** Protect valuable mineral resources by prohibiting or restricting incompatible projects and land uses (i.e., those that interfere with extraction, processing, or transportation of minerals) within resource areas in Figure OSC-9. |
| OSC-6.2 | **Site Design**. Encourage compact design and layout for mineral resource processing areas, preserving as much land as possible for buffering between these areas and adjacent land uses. |
| OSC-6.3 | **Mining Oversight**. In cooperation with San Bernardino County, provide oversight of extraction sites, including sand and gravel quarries, and monitor the status and duration of existing permits and approvals. |
| OSC-6.4* | **Mineral Extraction Operations**. Impose conditions and enforce mitigation measures to reduce the dust, noise, and safety hazards due to the mining, processing, and removal of aggregate and to minimize impacts on adjacent properties and environmental resources. |
| OSC-6.5* | **Access Routes**. Determine and designate approved access routes to and from quarries, mining operations, and processing and transporting locations to minimize the impacts on City streets and neighborhoods. |
| OSC-6.6* | **SMARA Requirements**. Require that the operation and reclamation of surface mines be compliant with the SMARA, applicable City and County codes, and environmental regulations from resource agencies. |
| OSC-6.7* | **Reclamation Procedures**. Designate post-aggregate extraction reclamation procedures to mitigate potential environmental impacts and safety hazards. Long-term monitoring of the effectiveness of reclamation procedures should be an integral part of the program. |

* Denotes mitigating policies

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Roughly one-third of the DTSP Area contains MRZ-2 designated resources, specifically in the southern portion past 5th Street to Rialto Avenue, as seen in Figure 3.12-1. However, no part of the DTSP Area has been designated for mining or extraction land use by the General Plan, and no site in the DTSP Area has been identified by the U.S. Geological Survey as having past or current mineral producing or processing uses (USGS 2011). The DTSP Area is now, and has long been highly developed with dense urban land uses, making mining or extraction operations physically and functionally incompatible. Consequently, the availability of any underlying mineral resource for regional or state use was effectively foreclosed by prior urban development. The DTSP would result in redevelopment of already developed uses in urbanized context. It does not change the fundamental incompatibility with mining established by the existing built environment. Therefore, the DTSP would not result in a new or incremental loss of a known mineral resource. The impact on mineral resource availability is a pre-existing condition to the historical development of the downtown core. The DTSP does not alter the area's established, non-extractive character or remove a currently viable resource option, and is therefore, **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update explicitly protects MRZ-2 areas through IE and IH land use designations to prevent incompatible development that could disrupt aggregate mining. Projects in these zones must comply with SMARA and demonstrate either avoidance of resource conflicts or mitigation measures (e.g., alternative sourcing, site restoration). If a project were to displace an active or planned mineral recovery site, it would need approval under General Plan Update Policy OSC-6.6, which ensures SMARA compliance. Surrounding uses in these areas are also generally industrial or commercial in nature, minimizing land use compatibility for uses that would be sensitive to nuisances related to mineral extraction. For projects outside these designated areas, no loss of locally important mineral resources would occur. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

No mineral resource recovery operations exist in or adjacent to the DTSP Area. Implementation of the DTSP would not result in the loss of availability of a locally important mineral resource recovery site delineated in any land use plan. Therefore, **no impact** would occur.

**Significance without Mitigation:** No impact.

## 3.12.4 Cumulative Impact Analysis

The geographic scope of cumulative impacts on mineral resources is evaluated based on the potential impacts of past and future development in the City of San Bernardino.

**Would the project have a cumulative effect related to mineral resources?**

Though the city contains regionally significant mineral resources in designated MRZ-2 zones near Cajon Wash, Lytle Creek, Warm Creek, and the Santa Ana River. Additionally, urban development has rendered many potential mineral resource areas unsuitable for extraction, and the General Plan Update's policies (OSC-6.1 through OSC-6.7) ensure protection of remaining viable sites through SMARA compliance, zoning restrictions, and reclamation requirements. Therefore, the proposed project's individual impact on mineral resources is less than significant. Furthermore, because the project does not affect protected MRZ-2 zones and the regulatory framework minimizes cumulative loss, the project's contribution to a cumulative impact on mineral resources is less than cumulatively considerable.

**Significance without Mitigation:** Less than significant.

## 3.12.5 References

CDC (California Department of Conservation). 2008. Mineral Land Classification Map. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc.

USGS (United States Geological Survey). 2011. California Mineral Resources. https://databasin.org/maps/new/#datasets=f2985196ca6b45cf8f2ad604beb95b34.

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# 3.13 NOISE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the City of San Bernardino General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project", to result in noise impacts on the noise environment within the city and its sphere of influence. Specifically, this section summarizes relevant State and local noise guidelines, policies, and standards; characterizes existing noise levels in the planning area; and evaluates potential long-term noise impacts resulting from forecasted land use changes and population growth. The analysis in this section is based in part on the noise modeling in the following technical study:

- *Noise Modeling*, PlaceWorks, November 2025 (Appendix G).

## Terminology

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Lmax.** The instantaneous maximum noise level for a specified period of time.
- **Equivalent Continuous Noise Level (Leq); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level that, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the Leq metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.
- **Statistical Sound Level (Ln).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L50 level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L10 level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the "intrusive sound level." The L90 is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."
- **Day-Night Sound Level (Ldn or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.

- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the Ldn value). As a matter of practice, Ldn and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Peak Particle Velocity (PPV).** The peak signal value of an oscillating vibration velocity waveform usually expressed in inches per second (in/sec).
- **Sensitive Receptor.** Sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.

## Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

## Sound Fundamentals

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale

(dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

## Sound Measurement

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, while 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called $L_{eq}$), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the $L_{50}$ noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the $L_2$, $L_8$, and $L_{25}$ values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance for stationary noise sources with a city's noise ordinance, as discussed

below. Other values typically noted during a noise survey are the Lmin and Lmax. These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level ($L_{dn}$). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 a.m. to 10:00 p.m. and 10 dBA for the hours from 10:00 p.m. to 7:00 a.m. The $L_{dn}$ descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 p.m. and 10:00 p.m. Both descriptors give roughly the same 24 hour level with the CNEL being only slightly more restrictive (i.e., higher).

## Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear.

## Vibration Fundamentals

Vibration is an oscillatory motion through a solid medium, such as the ground or a building. Vibration is normally associated with activities stemming from operations of railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers.

## Amplitude

Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square (RMS) velocity. PPV is the maximum instantaneous peak of the vibration signal, and RMS is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Persons accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 3.13-1, *Human Reaction to Typical Vibration Levels*, shows the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

**Table 3.13-1 Human Reaction to Typical Vibration Levels**

| Vibration Level Peak Particle Velocity | Human Reaction | Effect on Buildings |
|---|---|---|
| 0.006–0.019 in/sec | Threshold of perception, possibility of intrusion | Vibrations unlikely to cause damage of any type |
| 0.08 in/sec | Vibrations readily perceptible | Recommended upper level of vibration to which ruins and ancient monuments should be subjected |
| 0.10 in/sec | Level at which continuous vibration begins to annoy people | Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings |
| 0.20 in/sec | Vibrations annoying to people in buildings | Threshold at which there is a risk to “architectural” damage to normal dwellings – houses with plastered walls and ceilings |
| 0.4–0.6 in/sec | Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges | Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage |

Source: Caltrans 2013.

# Regulatory Framework

## FEDERAL

### U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) has identified the relationship between noise levels and human response. The USEPA determined that over a 24-hour period, an Leq of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at an Leq of 55 dBA and interior levels at or below 45 dBA. These levels are relevant to planning and design and useful for informational purposes, but they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community; therefore, they are not mandated.

The USEPA also set 55 dBA Ldn as the basic goal for exterior residential noise intrusion. However, other federal agencies, in consideration of their own program requirements and goals, as well as the difficulty of actually achieving a goal of 55 dBA Ldn, have settled on the 65 dBA Ldn level as their standard. At 65 dBA Ldn, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

### United States Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) has set a goal of 65 dBA Ldn as a desirable maximum exterior standard for residential units developed under HUD funding. (This level is also generally accepted by the State of California.) While HUD does not specify acceptable interior noise levels, standard construction of residential dwellings typically provides more than 20 dBA of attenuation with the windows closed. Based on this premise, the interior Ldn should not exceed 45 dBA.

### Federal Highway Administration

Proposed federal or federal-aided highway construction projects at a new location, or the physical alteration of an existing highway that significantly changes the horizontal or vertical alignment or increases the number of through-traffic lanes, require an assessment of noise and consideration of noise abatement per the Code of Federal Regulations Title 23, Part 772, “Procedures for Abatement of Highway Traffic Noise and Construction Noise.” The FHWA has adopted noise abatement criteria for sensitive receivers—such as picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals—when “worst-hour” noise levels approach or exceed 67 dBA Leq (FHWA 2017a).

### Federal Transit Administration

The Federal Transit Administration (FTA) oversees safety measures related to noise and vibration. The FTA’s Transit Noise and Vibration Impact Assessment manual indicates that 80 A-

weighted decibels (dBA) equivalent sound level ($L_{eq}$) is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018). In the absence of local construction noise limits, the FTA recommended 80 dBA $L_{eq}$ criteria is used to assess the significance of construction noise levels at residential receivers as shown in Table 3.13-2, *FTA Detailed Analysis Construction Noise Criteria*.

**Table 3.13-2 FTA Detailed Analysis Construction Noise Criteria**

| Building/Structural Category | Leq (8hr) dBA | |
|---|---|---|
| | Daytime | Nighttime |
| Residential | 80 | 70 |
| Commercial | 85 | 85 |
| Industrial | 90 | 90 |

Source: FTA 2018.

Notes: dBA = A-weighted decibels

FTA = Federal Transit Administration

Leq = equivalent continuous sound level

The FTA also provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 3.13-3, *FTA Construction Vibration Damage Criteria*.

**Table 3.13-3 FTA Construction Vibration Damage Criteria**

| Building/Structural Category | Peak Particle Velocity (PPV) (in/sec) | Approximate Vibration dB |
|---|---|---|
| I. Reinforced-concrete, steel, or timber (no plaster) | 0.5 | 102 |
| II. Engineered concrete and masonry (no plaster) | 0.3 | 98 |
| III. Non-engineered timber and masonry buildings | 0.2 | 94 |
| IV. Buildings extremely susceptible to vibration damage | 0.12 | 90 |

Source: FTA 2018.

in/sec = inches per second

According to FTA's *Transit Noise and Vibration Impact Assessment Manual*, a vibration velocity (VdB) of 75 to 80 VdB will annoy individuals. Table 3.13-4, *Human Response to Different Levels of Groundborne Vibration and Noise*, presents the human response to different levels of ground-borne vibration and noise.

**Table 3.13-4 Human Response to Different Levels of Groundborne Vibration and Noise**

| Vibration Velocity Level | Nosie Level | | Human Response |
|---|---|---|---|
| | Low Frequency | Mid Frequency | |
| 65 VdB | 25 dBA | 40 dBA | Approximate threshold of perception for many humans. Low-frequency sound: usually inaudible. Mid-frequency sound: excessive for quiet sleeping areas. |
| 75 VdB | 35 dBA | 50 dBA | Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise: tolerable for sleeping areas. Mid-frequency noise: excessive in most quiet occupied areas. |
| 85 VdB | 45 dBA | 60 dBA | Vibration tolerable only if there are an infrequent number of events per day. Low-frequency noise: excessive for sleeping areas. Midfrequency noise: excessive even for infrequent events for some activities. |

Source: FTA 2018, Table 5-5.

Low Frequency= Approximate noise level when vibration spectrum peak is near 30 hertz (Hz).

Mid Frequency= Approximate noise level when vibration spectrum peak is near 60 Hz.

## Federal Rail Administration

The Burlington Northern Santa Fe (BNSF), Union Pacific, and Metrolink railroads also transverse the City of San Bernardino. The EPA is charged with regulating railroad noise under the Noise Control Act, however, the Federal Railroad Administration (FRA) regulates railroad operations in the United States. The Federal Railroad Administration (FRA). Table 3.13-5, *Summary of EPA/FRA Railroad Noise Standards*, summarizes the EPA railroad noise standards that set operating noise standards for railroad equipment and set noise limit standards for new equipment.

**Table 3.13-5 Summary of EPA/FRA Railroad Noise Standards**

| Noise Sources | Operating Conditions | Noise Metric [1, 2] | Measured Distance (feet) | Standard (dBA) |
|---|---|---|---|---|
| Non-Switcher Locomotives built on or before 12/31/79 | Stationary | Lmax (Slow) | 100 | 73 |
| | Idle Stationary | Lmax (Slow) | 100 | 93 |
| | Non-Idle Moving | Lmax (Fast) | 100 | 95 |
| Switcher Locomotives plus Non-Switcher Locomotives built after 12/31/79 | Stationary | Lmax (Slow) | 100 | 70 |
| | Idle Stationary | Lmax (Slow) | 100 | 87 |
| | Non-Idle Moving | Lmax (Fast) | 100 | 90 |
| Rail Cars | Speed < 45 mph | Lmax (Fast) | 100 | 88 |
| | Speed > 45 mph | Lmax (Fast) | 100 | 93 |
| | Coupling | Adj. Avg. Max. | 50 | 92 |

Source: United States Environmental Protection Agency Railroad Noise Emission Standard (40 Code of Federal Regulations Part 201).

1 Slow and fast exponential-time-weighting is used.

2 Note that these values are in terms of the Lmax, and can be considerably greater than the Leq typically used in the measurement of obtrusive noise.

## STATE

### State of California General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. The General Plan Guidelines provide cities with recommended community noise and land use compatibility standards that can be adopted or modified at the local level based on conditions and types of land uses specific to that jurisdiction.

### California Code of Regulations

The California Department of Health Services' (DHS) Office of Noise Control has developed noise standards, as shown in Table 3.13-6, *State of California Interior and Exterior Noise Standards*, based on studies correlating noise levels and their effects on various land uses.

**Table 3.13-6 State of California Interior and Exterior Noise Standards**

| Land Use Category | | CNEL (dBA) | |
|---|---|---|---|
| **Categories** | **Uses** | **Interior[1]** | **Exterior[2]** |
| Residential | Single and multi-family, duplex | 45[3] | 65 |
| | Mobile Homes | ---- | |
| Commercial | Hotel, motel, transient housing | 45 | 65[4] |
| | Commercial retail, bank, restaurant | 55 | ---- |
| | Office building, research and development, professional offices | 50 | ---- |
| | Amphitheater, concert hall, auditorium, movie theater | 45 | ---- |
| | Gymnasium (Multipurpose) | 50 | ---- |
| | Sports Club | 55 | ---- |
| | Manufacturing, warehousing, wholesale, utilities | 65 | ---- |
| | Movie Theaters | 45 | ---- |
| Institutional, Public | Hospital, school classrooms, playgrounds | 45 | 65 |
| | Church, library | 45 | ---- |
| Open Space | Parks | ---- | 65 |

Source: Governor's Office of Planning and Research. Noise Element Guidelines.

1 Indoor environment excluding: bathrooms, kitchens, toilets, closets, and corridors

2 Outdoor environment limited to:

Private yard of single-family dwellings

Multi-family private patios or balconies accessed from within the dwelling (Balconies 6 feet deep or less are exempt)

Mobile home parks

Park picnic areas

School playgrounds

Hospital patios

3 Noise level requirement with closed windows, mechanical ventilation or other means of natural ventilation shall be provided as per Chapter 12, Section 1205 of the Uniform Building Code.

4 Exterior noise levels should be such that interior noise levels will not exceed 45 dBA CNEL.

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations (CCR), Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive

method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA $L_{eq}$ (1hr).

### Airport Noise Standards

California Code of Regulations Title 21, Section 5012, establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Noise-sensitive land uses are generally incompatible in locations where the aircraft exterior noise level exceeds 65 dBA CNEL unless an aviation easement for aircraft noise has been acquired by the airport proprietor. Assembly Bill (AB) 2776 requires any person who intends to sell or lease residential properties in an Airport Influence Area to disclose that fact to the person buying the property.

### California Department of Transportation

The California Department of Transportation (Caltrans) recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards. A conservative vibration limit of 0.25 to 0.30 in/sec PPV has been used for older buildings that are found to be structurally sound but cosmetic damage to plaster ceilings or walls is a major concern. For historic buildings or buildings that are documented to be structurally weakened, a conservative limit of 0.08 in/sec PPV is often used to provide the highest level of protection. All of these limits have been used successfully and compliance with these limits has not been known to result in appreciable structural damage. All vibration limits referred to herein apply on the ground level and take into account the response of structural elements (i.e., walls and floors) to groundborne excitation.

### Assembly Bill 1307

Signed into law on September 7, 2023, AB 1307 amends the California Environmental Quality Act (CEQA) and adds Public Resources Code (PRC) Section 21085. Pursuant to PRC Section 20185 for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment. Accordingly, the noise from residential development projects is limited to construction noise, noise from the operation of the house (e.g., heating, ventilation, and air conditioning equipment), and increases in transportation noise from vehicle trips generated from the residential project.

## REGIONAL

### San Bernardino International Airport Authority

Operations and activity associated with the San Bernardino International Airport (SBIA) produce noise that may be heard within the City. The SBIA was initially built as Norton Air Force Base by the United States Air Force (USAF). Under the Base Realignment and Closure Act of 1990,

Norton Air Force base was closed and disposed of by the USAF for civilian aviation reuse in 1994, and was then transferred to the San Bernardino International Airport Authority (SBIAA). The SBIAA operates the facility as a public-use general aviation airport that accommodates aircraft ranging from piston-powered propeller aircraft to multi-engine jet aircraft, including large cargo aircraft. The Eastgate Air Cargo Facility Final Environmental Assessment identifies noise compatibility zones in the form of airport noise contour graphics, published by the SBIAA on July 2, 2019, that are intended to prevent development that is incompatible with airport operations.

## LOCAL

### City of San Bernardino General Plan

The City of San Bernardino General Plan Noise Element identifies several goals and policies to minimize the impacts of excessive community noise levels. The Noise Element provides policy guidance addressing the generation, mitigation, avoidance, and the control of excessive noise. The noise policies specified in the General Plan Noise Element provide the guidelines necessary to satisfy these goals.

### City of San Bernardino Noise Ordinance

The City has established citywide noise level standards in the San Bernardino Municipal Code (SBMC). The purpose of the Noise Ordinance is to control loud, unnecessary and unusual noises, sounds, or vibrations emanating from areas of the city. Sections of the SBMC comprising the Noise Ordinance include Section 8.54, Noise Control, which establishes permissible noise limits in the City as well as prohibited noises. Additionally, Section 15.68.020 provides permissible vibration limits for equipment and machinery. The existing Dev Code also establishes acceptable exterior and interior noise standards for residential uses in Section 19.20.30. The following provides the specific standards in these sections of the SBMC and existing Dev Code:

- **Section 8.54.050, Controlled Hours of Operation**. It shall be unlawful for any person to engage in the following activities other than between the hours of 8:00 a.m. and 8:00 p.m. in residential zones and other than between the hours of 7:00 a.m. and 8:00 p.m. in all other zones:

  A. Operate or permit the use of powered model vehicles and planes;

  B. Load or unload any vehicle, or operate or permit the use of dollies, carts, forklifts or other wheeled equipment that causes any impulsive sound, raucous or unnecessary noise within 1,000 feet of a residence;

  C. Operate or permit the use of domestic power tools, or machinery or any other equipment or tool in any garage, workshop, house or any other structure;

D. Operate or permit the use of gasoline or electric powered leaf blowers, such as commonly used by gardeners and other persons for cleaning lawns, yards, driveways, gutters and other property;

E. Operate or permit the use of privately operated street/parking lot sweepers or vacuums, except that emergency work and/or work necessitated by unusual conditions may be performed with the written consent of the City Manager;

F. Operate or permit the use of electrically operated compressor, fan and other similar devices.

G. Operate or permit the use of any motor vehicle with a gross vehicle weight rating in excess of 10,000 pounds, or of any auxiliary equipment attached to such a vehicle, including, but not limited to, refrigerated truck compressors for a period longer than 15 minutes in any hour while the vehicle is stationary and on a public right-of-way or public space except when movement of said vehicle is restricted by other traffic; and

H. Repair, rebuild, reconstruct or dismantle any motor vehicle or other mechanical equipment or devices in a manner so as to be plainly audible across property lines.

- **Section 8.54.060, Exemptions**. The following activities and noise sources shall be exempt from the provisions of this chapter:

A. The use of horns, sirens or other signaling or warning devices by persons vested with legal authority to use the same, and in pursuit of their lawful duties, such as on ambulances, fire, police or other governmental or official equipment;

B. Such noises as are an accompaniment and effect of a lawful business, commercial or industrial enterprise carried on in an area zoned for that purpose, except where there is evidence that such noise is a nuisance and that such a nuisance is a result of the employment of unnecessary and injurious methods of operation;

C. Activities conducted on the grounds of any public or private school during regular hours of operation;

D. Outdoor gatherings, public dances, shows and sporting and entertainment events provided said events are authorized by the city;

E. Activities conducted at public spaces during regular hours of operation;

F. Any mechanical devices, apparatus or equipment used, related to or connected with emergency machinery, vehicle or work;

G. Construction, repair or excavation necessary for the immediate preservation of life or property;

H. Construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation departments, public work projects or essential

public services and facilities, including, but not limited to, trash collection and those of public utilities subject to the regulatory jurisdiction of the State Public Utilities Commission;

I. Construction, repair or excavation work performed pursuant to a valid written agreement with the city, or any of its political subdivisions, which provides for noise mitigation measures;

J. Any activity to the extent that regulation thereof has been preempted by state or federal law; and

K. Sounds generated in connection with speech or communication protected by the U.S. Constitution or the California Constitution, except to the extent such sounds are subject to permissible time, place and manner restrictions.

- **Section 8.54.070, Disturbances From Construction Activity**. No person shall be engaged or employed or cause any other person to be engaged or employed in any work of construction, erection, alteration, repair, addition, movement, demolition or improvement to any building or structure except within the hours of 7:00 a.m. and 8:00 p.m.
- **Section 15.68.020 Permit For Installation.** The purpose of this chapter is to regulate the installation, operation and maintenance of equipment or machinery, including, but not limited to, washers, dryers, extractors and washer extractors of 55-pound capacity or larger, and compressors.

  B. A design drawing and calculations shall be submitted with the application for a permit showing all information pertaining to the equipment or machinery which is necessary for a determination of foundation requirements in order that it may operate efficiently, safely and with a minimum of vibration. A requirement of installation based on the design shall be that the ground vibration inherently and recurrently generated does not cause a displacement of the earth greater than 0.033 of one inch as measured at any point radially in any plane from the foundation, as determined by the City Engineer.

- **Section 19.20.30(15), Noise.** No loudspeaker, bells, gongs, buzzers, mechanical equipment or other sounds, attention attracting, or communication device associated with any use shall be discernible beyond any boundary line of the parcel, except fire protection devices, burglar alarms and church bells. The following provisions shall apply:

  A. In residential areas, no exterior noise level shall exceed 65 dBA and no interior noise level shall exceed 45 dBA.

  B. All residential developments shall incorporate the following standards to mitigate noise levels:

     1. Increase the distance between the noise source and receiver.

2. Locate land uses not sensitive to noise (i.e., parking lots, garages, maintenance facilities, utility areas, etc.) between the noise source and the receiver.
3. Bedrooms should be located on the side of the structure away from major rights-of-way.
4. Quiet outdoor spaces may be provided next to a noisy right-of-way by creating a U-shaped development which faces away from the right-of-way.

C. The minimum acceptable surface weight for a noise barrier is four pounds per square foot (equivalent to ¾-inch plywood). The barrier shall be of a continuous material which is resistant to sound including:
   1. Masonry block
   2. Precast concrete
   3. Earth berm or a combination of earth berm with block concrete.

D. Noise barriers shall interrupt the line-of-sight between noise source and receiver.

- **Section 19.20.30(21), Screening**. Any equipment, whether on the roof, side of structure, or ground, shall be screened. The method of screening shall be architecturally compatible in terms of materials, color, shape, and size. The screening design shall blend with the building design and include landscaping when on the ground.
- **Section 19.20.30(29), Vibration.** No vibration associated with any use shall be permitted which is discernible beyond the boundary line of the property.

## 3.13.1 Existing Conditions

### CITYWIDE AREA

Across the City of San Bernardino, ambient noise conditions reflect a diverse urban soundscape shaped by transportation corridors, residential activity, and localized industrial operations. The 14 short-term monitoring locations distributed throughout the city reveal a broad range of A-weighted sound levels, with Leq values spanning from 48.8 dBA (ST-9) in quieter residential zones to 69.8 dBA (ST-11) adjacent to State Route 66. Locations near major arterials and freeways, such as SR-215, SR-210, and SR-66, consistently registered elevated Leq and Lmax values, often exceeding 65 dBA, indicating persistent vehicular noise as a dominant contributor. Rail adjacent sites like ST-3 and ST-10 also exhibited high Lmax values (up to 90.7 dBA), underscoring the influence of freight and Metrolink operations. Residential zones such as ST-1, ST-2, and ST-13 showed moderate Leq levels in the mid-50s, punctuated by intermittent spikes from dogs, birds, and passing vehicles. Parks and school-adjacent sites (ST-4, ST-5, ST-7) demonstrated variability depending on proximity to traffic corridors, with ST-7 reaching 80.9 dBA Lmax due to Highland Avenue traffic. Overall, the citywide noise environment is characterized by a mix of steady transportation-related sources and episodic residential or

mechanical activity, with several locations approaching or exceeding thresholds relevant to land use compatibility and sensitive receptor exposure.

## DOWNTOWN AREA

Within the Downtown Specific Plan area, existing noise conditions are shaped by transit infrastructure, mixed-use development, and concentrated vehicular activity. Monitoring locations ST-12 and ST-13, situated within or adjacent to the Downtown boundary, reflect this dynamic acoustic profile. ST-12, located at the San Bernardino Transit Center along Rialto Avenue, recorded a Leq of 65.4 dBA and Lmax of 81.8 dBA, driven by bus operations, Metrolink activity, and arterial traffic. These levels suggest a consistent and elevated ambient condition typical of multimodal transit hubs. ST-13, positioned near 655 W 8th Street, exhibited a lower Leq of 55.6 dBA, more indicative of residential influence, though still subject to intermittent vehicular and neighborhood noise. The Downtown area's proximity to SR-215 and the rail corridor contributes to elevated background levels, particularly during peak travel periods.

## AMBIENT NOISE MEASUREMENTS

### Short Term

Thirteen short-term (15-minute) measurement locations were selected and conducted around the City of San Bernardino (project site). All measurements were conducted July 1st and 2nd, 2025 in the afternoon to evening hours. The selection of locations was based on proposed land use district maps, noise sources, and noise sensitive receptor locations.

The short-term sound level meter used (Larson Davis LxT) for noise monitoring satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation.[1] The short-term sound level meter was set to "slow" response and "A" weighting (dBA). The meter was calibrated prior to and after each monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Short-term measurement locations are described below and shown in Figure 3.13-1, *Approximate Noise Monitoring Locations,* and results are summarized in Table 3.13-7.

[1] Monitoring of ambient noise was performed using Larson-Davis model LxT sound level meters.

**Table 3.13-7 Short-Term Noise Measurements Summary in A-weighted Sound Levels**

| Monitoring Location | Description | 15-minute Noise Level, dBA | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Leq | Lmax | Lmin | L50 | L25 | L8 | L2 |
| ST-1 | The end of the North Grape Court cul-de-sac next to 250 N Grape Ct. 7/1/25, 4:15 PM | 55.1 | 67.2 | 45.4 | 51.8 | 55.9 | 59.7 | 60.8 |
| ST-2 | Adjacent to the residence at 2260 Vermont Street. 7/2/25, 12:54 PM | 56.1 | 73.2 | 40.2 | 47.1 | 50.6 | 56.8 | 67.3 |
| ST-3 | North I Street, approximately 55 feet from the nearest rail line. 7/1/25, 12:00 PM to 1:00 PM | 67.3 | 89.0 | 52.6 | 57.8 | 61.2 | 69.0 | 74.8 |
| | 7/1/25, 1:00 PM to 2:00 PM | 68.2 | 89.4 | 52.2 | 57.8 | 61.3 | 67.5 | 77.4 |
| | 7/1/25, 2:00 PM to 3:00 PM | 69.0 | 88.1 | 52.8 | 62.9 | 64.8 | 67.7 | 77.8 |
| | 7/1/25, 3:00 PM to 4:00 PM | 68.0 | 90.7 | 55.1 | 59.6 | 62.3 | 67.4 | 71.5 |
| ST-4 | Centrally Located at Guhin Park. 7/2/25, 3:10 PM | 60.1 | 70.1 | 54.6 | 59.6 | 61.1 | 62.4 | 63.5 |
| ST-5 | North of Victoria Elementary School. 7/2/25, 11:51 AM | 59.7 | 73.2 | 44.7 | 54.2 | 60.4 | 64.6 | 67.4 |
| ST-6 | Southern portion of a vacant undeveloped parcel. 7/1/25, 12:59 PM | 64.5 | 68.4 | 58.3 | 64.4 | 65.6 | 66.4 | 67.1 |
| ST-7 | Northern end of Perris Hill Park. 7/1/25, 12:32 PM | 63.3 | 80/9 | 49.3 | 61.2 | 63.4 | 66.2 | 69.4 |
| ST-8 | Western portion of Cable Canyon Road. 7/2/25, 12:32 PM | 67.0 | 82.3 | 61.1 | 66.0 | 67.0 | 68.4 | 72.1 |
| ST-9 | Western end of West Darby Street. 7/2/25, 2:28 PM | 48.8 | 63.6 | 39.8 | 45.2 | 47.1 | 52.9 | 57.9 |
| ST-10 | At the end of an unmarked trail. 7/2/25, 3:47 PM | 57.3 | 73.6 | 50.3 | 53.9 | 55.4 | 58.2 | 67.9 |
| ST-11 | The southern end of a vacant undeveloped parcel along SR-66. | 69.8 | 83.1 | 49.4 | 67.8 | 71.0 | 73.5 | 75.8 |

**Table 3.13-7 Short-Term Noise Measurements Summary in A-weighted Sound Levels**

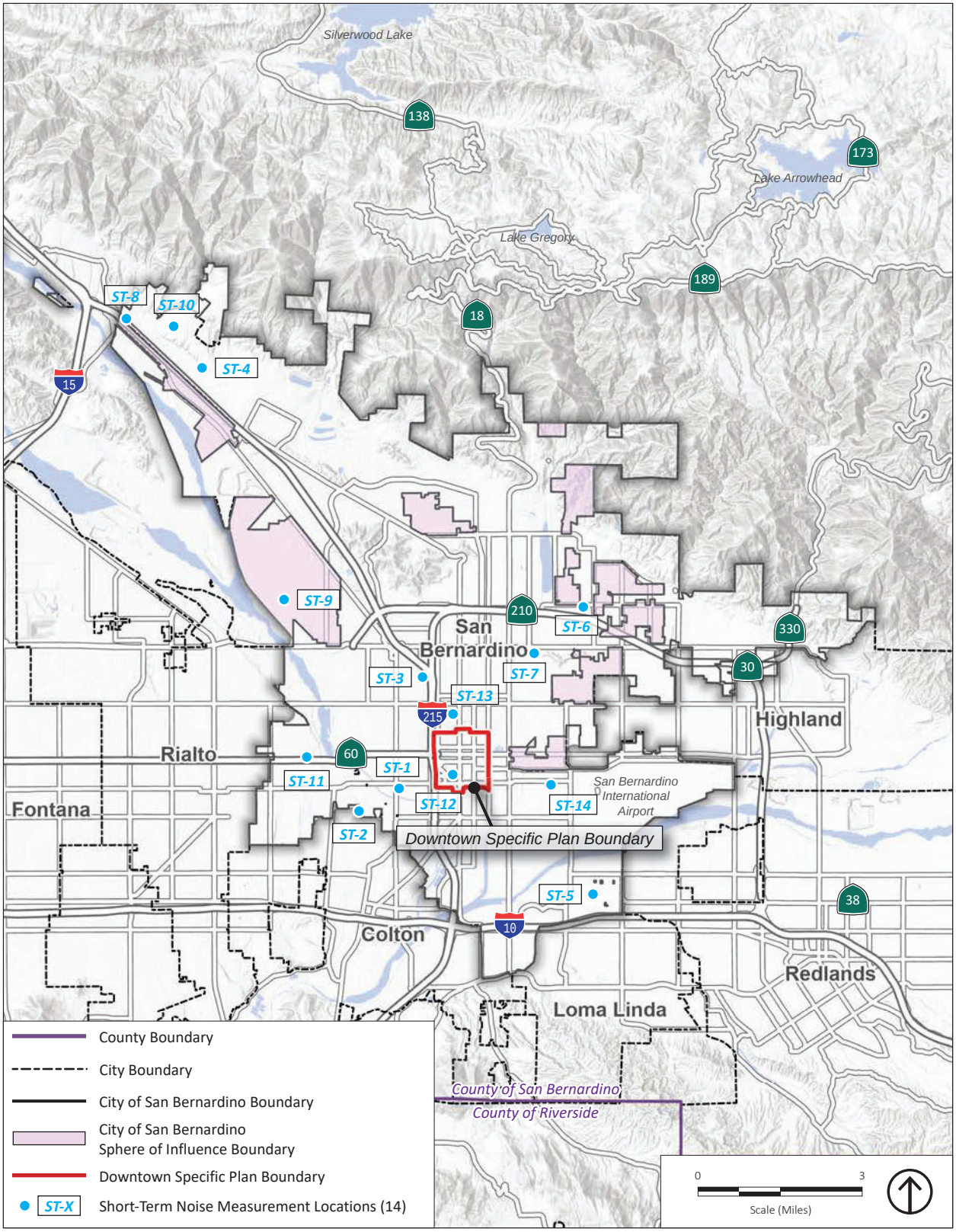
| Monitoring Location | Description | 15-minute Noise Level, dBA | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | | Leq | Lmax | Lmin | L50 | L25 | L8 | L2 |
| | 7/1/25, 3:43 PM | | | | | | | |
| ST-12 | At the northern portion of the San Bernardino Transit Center. 7/1/25, 2:28 PM | 65.4 | 81.8 | 56.5 | 62.2 | 64.8 | 68.8 | 72.9 |
| ST-13 | Southwestern end of a vacant undeveloped parcel adjacent to 655 W 8th Street. 7/1/25, 1:43 PM | 55.6 | 66.1 | 49.5 | 53.3 | 55.5 | 59.3 | 63.2 |
| ST-14 | At the southern end of the mobile home park at 907 East Rialto Avenue. 7/2/25, 12:21 PM | 53.0 | 71.7 | 41.9 | 45.4 | 47.4 | 52.9 | 61.5 |

Source: PlaceWorks 2025

**Short-Term Location 1 (ST-1)** was conducted at the end of the North Grape Court cul-de-sac in front of the residence on 250 N Grape Ct. The measurement was located approximately 500 feet south of the San Bernardino Rail Depo main tracks. A 15-minute noise measurement began at 4:15 PM on Tuesday, July 1, 2025. The noise environment is characterized by residential noises (i.e., birds, dogs barking, cars driving by) in the nearby area, and freight trains at the San Bernardino Train Depo. Noise levels measured 55.1 dBA $L_{eq}$ and 67.2 dBA $L_{max}$ during the measurement period at ST-1.

**Short-Term Location 2 (ST-2)** was conducted at the northern end of Vermont Street adjacent to the residence at 2260 Vermont Street, approximately 400 feet away from the train tracks. A 15-minute noise measurement began at 12:54 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by residential noise (i.e., street sweeper, cars, birds, ice cream trucks), and distant freight activity. Noise levels measured 56.1 dBA $L_{eq}$ and 73.2 dBA $L_{max}$ during the measurement period at ST-2.

**Short-Term Location 3 (ST-3)** was conducted centrally along North I Street, approximately 55 feet from the nearest rail line to the east. Continuous 60-minute noise measurement intervals began at 12:00 PM and ended at 4:00 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by neighborhood chickens, roosters and dog activity, and rail operations. Vehicle traffic associated with Interstate 215 also contributed to the noise environment. Noise levels measured 60.1 dBA $L_{eq}$ and 70.1 dBA $L_{max}$ during the measurement period at ST-3.




Source: Generated using GIS Pro 2026.

Figure 3.13-1
**Approximate Noise Monitoring Locations**

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**Short-Term Location 4 (ST-4)** was conducted centrally at Guhin Park, approximately 250 feet from the portable buildings to the south. A 15-minute noise measurement began at 3:10 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by activity vehicle traffic at State Route 215 (SR-215). Noise levels measured 60.1 dBA $L_{eq}$ and 70.1 dBA $L_{max}$ during the measurement period at ST-4.

**Short-Term Location 5 (ST-5)** was conducted north of Victoria Elementary School at the vehicle access road to the urban run-off creek. A 15-minute noise measurement began at 11:51 PM on Wednesday, July 2, 2025. The noise environment is characterized by residential noises (i.e., birds, dogs barking, cars driving by) in the nearby area. Noise levels measured 59.7 dBA $L_{eq}$ and 73.2 dBA $L_{max}$ during the measurement period at ST-5.

**Short-Term Location 6 (ST-6)** was conducted at the southern portion of a vacant undeveloped parcel, approximately 375 feet from residences at 2935 Mountain Avenue. A 15-minute noise measurement began at 12:59 PM on Tuesday, July 1, 2025. The noise environment is characterized primarily by vehicle traffic from SR-210, small planes, and residential noise (i.e., dogs barking, and car music). Noise levels measured 64.5 dBA $L_{eq}$ and 68.4 dBA $L_{max}$ during the measurement period at ST-6.

**Short-Term Location 7 (ST-7)** was conducted at the northern end of Perris Hill Park, approximately 280 feet from the San Bernadino YMCA building and approximately 180 feet from the San Bernadino Parks and Recreation marquee sign. A 15-minute noise measurement began at 12:32 PM on Tuesday, July 1, 2025. The noise environment is characterized primarily by vehicle traffic from Highland Avenue. Noise levels measured 63.3 dBA $L_{eq}$ and 80.9 dBA $L_{max}$ during the measurement period at ST-7.

**Short-Term Location 8 (ST-8)** was conducted at the western portion of Cable Canyon Road. A 15-minute noise measurement began at 4:25 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by activity vehicle traffic at State Route 215 (SR-215). Noise levels measured 67.0 dBA $L_{eq}$ and 82.3 dBA $L_{max}$ during the measurement period at ST-8.

**Short-Term Location 9 (ST-9)** was conducted at the western end of West Darby Street. A 15-minute noise measurement began at 2:28 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by residential noise (i.e., birds, and cars), distant vehicles on SR-210, and mechanical equipment at the mine directly south. Noise levels measured 48.8 dBA $L_{eq}$ and 63.6 dBA $L_{max}$ during the measurement period at ST-9.

**Short-Term Location 10 (ST-10)** was conducted at an unmarked trail south of the southern end of a private residential roadway, approximately 745 feet from the residence directly northwest. A 15-minute noise measurement began at 3:47 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by distant vehicle traffic from SR-215, and BNSF freight

train in the distance. Noise levels measured 57.3 dBA $L_{eq}$ and 73.6 dBA $L_{max}$ during the measurement period at ST-10.

**Short-Term Location 11 (ST-11)** was conducted at the southern end of a vacant undeveloped parcel along SR-66. A 15-minute noise measurement began at 3:43 PM on Tuesday, July 1, 2025. The noise environment is characterized primarily by consistent vehicle traffic at State Route 66 (SR-66). Noise levels measured 69.8 dBA $L_{eq}$ and 83.1 dBA $L_{max}$ during the measurement period at ST-8.

**Short-Term Location 12 (ST-12)** was conducted at the northern portion of the San Bernardino Transit Center along Rialto Avenue. A 15-minute noise measurement began at 2:28 PM on Tuesday, July 1, 2025. The noise environment is characterized by vehicle traffic (i.e., including busses), and the metro link. Noise levels measured 65.4 dBA $L_{eq}$ and 81.8 dBA $L_{max}$ during the measurement period at ST-12.

**Short-Term Location 13 (ST-13)** was conducted at the southwestern end of a vacant undeveloped parcel along 8th Street, adjacent to 655 W 8th Street. A 15-minute noise measurement began at 1:43 PM on Tuesday, July 1, 2025. The noise environment is characterized primarily by residential noise (i.e., birds, dogs, and cars). Noise levels measured 55.6 dBA $L_{eq}$ and 66.1 dBA $L_{max}$ during the measurement period at ST-13.

**Short-Term Location 14 (ST-14)** was conducted at the southern end of the mobile home park at 907 East Rialto Avenue. A 15-minute noise measurement began at 12:21 PM on Wednesday, July 2, 2025. The noise environment is characterized primarily by airport traffic overhead (small and large planes), semi-trailers/ trucks loading and unloading, and residential noise (i.e., leaf blower, cars). Noise levels measured 53.0 dBA $L_{eq}$ and 71.7 dBA $L_{max}$ during the measurement period at ST-14.

## Traffic Noise

Noise from motor vehicles is generated by engine vibrations, the interaction between tires and the road, and the exhaust system. Reducing the average motor vehicle speed reduces the noise exposure of receptors adjacent to the roadway. Given the prevalence of mobile-source noise in the project area, it is necessary to determine the noise currently generated by vehicles traveling through the project area. Average daily traffic volumes were based on the existing daily traffic volumes calculated using peak hour intersection movements provided by KOA (see Appendix I-1).

The traffic noise levels for this project were estimated using a version of the FHWA Highway Traffic Noise Prediction Model. The FHWA model determines a predicted noise level through a series of adjustments to a reference sound level. These adjustments account for traffic flows, speed, truck mix, varying distances from the roadway, and length of exposed roadway. Vehicle speeds on each roadway were assumed to be the posted speed limit, and no reduction in speed

was assigned due to congested traffic flows. Current roadway characteristics, such as the number of lanes and speed limits, were determined from field observations and according to roadway classification.

The results of traffic noise modeling indicate that average noise levels along project area roadway segments currently range from approximately 54 dBA to 78 dBA CNEL (as calculated at a distance of 50 feet from the centerline of the road). Traffic noise levels for existing conditions, including distances to the 70 dBA, 65 dBA, and 60 dBA CNEL contours, along analyzed roadways are presented in Table 3.13-8, *Existing Roadway Traffic Noise Levels*. Table 3.13-9, *Existing Interstate and State Route Traffic Noise Levels,* shows existing traffic noise levels 100 feet from the centerline and contour distances to the 70 dBA, 65 dBA, and 60 dBA CNEL.

**Table 3.13-8 Existing Roadway Traffic Noise Levels**

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| 2nd St | Mt. Vernon Ave | I-215 NB Ramps | 8,798 | 69 | 45 | 97 | 209 |
| 2nd St | I-215 NB Ramps | E St | 24,929 | 74 | 94 | 201 | 434 |
| 3rd Street | Arrowhead Ave | Mountain View Ave | 5,424 | 64 | 19 | 42 | 90 |
| 3rd St | Waterman Ave | Lena Rd | 11,382 | 74 | 93 | 201 | 432 |
| 3rd St | Tippecanoe Ave | Del Rosa Dr | 22,201 | 77 | 145 | 313 | 675 |
| 4th St | G St | F St | 4,026 | 57 | 7 | 15 | 32 |
| W 5th St | Foothill Blvd | Flores St | 23,822 | 74 | 95 | 204 | 439 |
| 5th St | I-215 NB Ramps | Mt. Vernon Ave | 41,454 | 77 | 147 | 316 | 680 |
| 5th St | I-215 NB Ramps | H St | 36,801 | 76 | 135 | 292 | 629 |
| 5th Street | Arrowhead Ave | Mountain View Ave | 19,012 | 74 | 87 | 188 | 405 |
| 5th St | Lankershim Ave | Sterling Ave | 5,220 | 70 | 49 | 105 | 225 |
| 6th Street | G St | F St | 3,556 | 60 | 11 | 24 | 53 |

**Table 3.13-8 Existing Roadway Traffic Noise Levels**

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| 6th Street | Arrowhead Ave | Mountain View Ave | 761 | 54 | 4 | 9 | 19 |
| 40th St | Waterman Ave | Golden Ave | 8,129 | 67 | 31 | 67 | 145 |
| D Street | 6th St | 7th St | 2,976 | 63 | 16 | 34 | 74 |
| D Street | Rialto Ave | 2nd St | 1,829 | 60 | 12 | 25 | 53 |
| E St | 36th St | Base Line St | 6,091 | 67 | 32 | 68 | 147 |
| E Street | 6th St | Victoria Ave | 6,591 | 67 | 31 | 67 | 144 |
| E St | Rialto Ave | Mill St | 8,422 | 68 | 37 | 80 | 172 |
| E St | Orange Show Rd | Mill St | 13,225 | 72 | 71 | 153 | 329 |
| S E St | Sunwest Ln | Hunts Ln | 20,320 | 74 | 94 | 202 | 435 |
| F Street | 6th St | Victoria Ave | 2,255 | 55 | 5 | 10 | 23 |
| G Street | 6th St | Victoria Ave | 8,281 | 60 | 11 | 24 | 53 |
| G Street | 2nd St | 3rd St | 9,339 | 66 | 28 | 60 | 129 |
| H Street | 6th St | Victoria Ave | 9,999 | 65 | 23 | 49 | 105 |
| Arrowhead Ave | 4th St | 5th St | 4,912 | 65 | 22 | 47 | 100 |
| Auto Center Rd | E St | Fairway Dr | 6,081 | 69 | 41 | 89 | 192 |
| Baseline St | California St | Medical Center Dr | 16,689 | 73 | 75 | 161 | 346 |
| Baseline St | I-215 SB Ramps | Perris St | 25,605 | 74 | 97 | 209 | 450 |
| Baseline St | G St | Berkeley St | 34,851 | 76 | 119 | 257 | 553 |
| Cajon Blvd | Shelter Way | Kendall Dr | 5,149 | 70 | 51 | 111 | 239 |
| Cajon Blvd | Palm Ave | 5th Ave | 5,730 | 71 | 55 | 119 | 256 |
| Cajon Blvd | Darbin St | Mt Vernon Ave | 12,128 | 74 | 88 | 190 | 409 |
| Central Ave | Tippecanoe Ave | Mountain View Ave | 11,637 | 68 | 40 | 85 | 184 |
| Del Rosa Ave | Date St | Highland Ave | 22,827 | 73 | 80 | 172 | 370 |
| Del Rosa Dr | Baseline St | 9th St | 7,945 | 72 | 73 | 158 | 340 |

**Table 3.13-8 Existing Roadway Traffic Noise Levels**

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Electric | 40th St | Northpark Blvd | 9,150 | 66 | 27 | 59 | 127 |
| Highland Ave | N Macy St | W City Limit | 11,327 | 70 | 49 | 106 | 228 |
| Highland Ave | H St | Mt Vernon Ave | 17,146 | 72 | 65 | 140 | 301 |
| Highland Ave | SR-259 | H St | 23,113 | 73 | 77 | 165 | 356 |
| Highland Ave | N Harrison St | Newport St | 22,980 | 73 | 80 | 172 | 371 |
| Highland Ave | Sterling Ave | Victoria Ave | 17,037 | 72 | 66 | 141 | 304 |
| W Hospitality Ln | Hunts Ln | Sunwest Ct | 8,512 | 69 | 45 | 97 | 210 |
| Hunts Ln | Redlands Blvd | Barton Rd | 18,309 | 74 | 87 | 188 | 406 |
| Inland Center Dr | I-215 NB Ramps | Adell St | 16,605 | 73 | 82 | 178 | 383 |
| Inland Center Dr | I-215 SB Ramps | I St | 16,710 | 73 | 83 | 178 | 384 |
| Kendall Dr | Palm Ave | University Pkwy | 20,310 | 75 | 114 | 245 | 527 |
| Kendall Dr | W 48th St | Little Mountain Dr | 15,518 | 74 | 95 | 205 | 441 |
| Mill St | Meridian Ave | Macy St | 13,450 | 72 | 65 | 139 | 300 |
| Mill St | I-215 SB Ramps | I St | 29,502 | 76 | 121 | 260 | 561 |
| Mill St | I-215 NB Ramps | G St | 18,818 | 74 | 90 | 193 | 416 |
| Mill St | S E St | Arrowhead Ave | 20,305 | 74 | 94 | 203 | 437 |
| Mill St | Waterman Ave | Lena Rd | 15,876 | 75 | 116 | 250 | 540 |
| Mountain View Ave | 4th St | 5th St | 1,854 | 54 | 4 | 9 | 20 |
| Mt Vernon Ave | W 16th St | Trenton St | 10,655 | 70 | 47 | 102 | 219 |

**Table 3.13-8 Existing Roadway Traffic Noise Levels**

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Mt Vernon Ave | Highland Ave | Johnston St | 10,204 | 69 | 46 | 99 | 213 |
| Northpark Blvd | Ash St | Campus Pkwy | 3,237 | 62 | 14 | 29 | 64 |
| Palm Ave | Kendall Dr | Belmont Ave | 15,219 | 70 | 47 | 102 | 219 |
| Palm Ave | Highland Ave | Atlantic Ave | 7,989 | 67 | 33 | 70 | 151 |
| Rialto Ave | Mt. Vernon Ave | K St | 11,163 | 65 | 25 | 53 | 115 |
| W Rialto Ave | I-215 Crossing | E St | 10,207 | 70 | 50 | 107 | 231 |
| Rialto Avenue | Arrowhead Ave | Mountain View Ave | 7,543 | 64 | 19 | 41 | 89 |
| Sierra Way | 4th St | 5th St | 7,604 | 60 | 11 | 24 | 51 |
| State St | Highland Ave | 16th St | 11,882 | 71 | 59 | 128 | 276 |
| Tippecano e Ave | Baseline St | 3rd St | 11,804 | 67 | 32 | 70 | 150 |
| Tippecano e Ave | Mill St | Harry Sheppard Blvd | 30,128 | 78 | 165 | 356 | 767 |
| Tippecano e Ave | Orange Show Rd | I-10 WB Ramp | 24,259 | 77 | 143 | 308 | 664 |
| University Pkwy | Kendall Dr | College Ave | 28,612 | 77 | 143 | 308 | 663 |
| University Pkwy | I-215 SB Ramps | Hallmark Pkwy | 19,289 | 75 | 110 | 236 | 509 |
| Waterman Ave | E 46th St | E 47th St | 15,588 | 76 | 122 | 264 | 568 |
| Waterman Ave | Marshall Ave | Highland Ave | 23,190 | 74 | 91 | 196 | 421 |
| Waterman Ave | E 16th St | E 17th St | 18,259 | 73 | 77 | 167 | 359 |
| Waterman Ave | Baseline St | 6th St | 19,225 | 73 | 80 | 173 | 372 |
| Waterman Ave | Valley St | Waterman Ave | 18,098 | 75 | 100 | 216 | 465 |

### Table 3.13-8 Existing Roadway Traffic Noise Levels

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Waterman Ave | Central Ave | Norman Rd | 22,466 | 76 | 131 | 282 | 607 |
| Waterman Ave | Orange Show Rd | Hospitality Ln | 24,342 | 77 | 138 | 297 | 641 |
| Waterman Ave | Redlands Blvd | Barton Rd | 24,073 | 77 | 136 | 293 | 632 |
| Victoria Ave | 6th St | 5th St | 8,025 | 67 | 31 | 66 | 143 |

Source: FHWA Highway Traffic Noise Prediction Model based on traffic volumes provided KOA (Appendix I-1). Calculations included in Appendix G

### Table 3.13-9 Existing Interstate and State Route Traffic Noise Levels

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Interstate 10 | Interstate 215 | Mountain View Avenue | 20,100 | 73 | 150 | 324 | 698 |
| Interstate 10 | Mountain View Avenue | East City Limits | 175,000 | 82 | 653 | 1,407 | 3,031 |
| Interstate 15 | Sierra Avenue | Interstate 215 | 198,000 | 82 | 609 | 1,313 | 2,828 |
| State Route 18 | Interstate 210 | 40th Street | 28,000 | 69 | 87 | 187 | 402 |
| State Route 18 | 40th Street | Sierra Way | 17,200 | 68 | 76 | 164 | 353 |
| State Route 18 | Sierra Way | North City Limits | 16,000 | 68 | 75 | 163 | 350 |
| State Route 66 | West City Limits | Interstate 215 | 17,800 | 67 | 64 | 138 | 297 |
| State Route 210 | West City Limits | Santa Ana River Bridge | 94,000 | 78 | 362 | 780 | 1,681 |
| State Route 210 | Santa Ana River Bridge | Interstate 10 | 74,000 | 77 | 308 | 664 | 1,432 |
| Interstate 215 | Interstate 10 | Mill Street | 216,000 | 83 | 702 | 1,513 | 3,260 |

**Table 3.13-9 Existing Interstate and State Route Traffic Noise Levels**

| Roadway | Segment | | Daily Traffic Volumes | Noise Level at 50 Feet (dBA CNEL) | Distance to Noise Contour (feet) | | |
|---|---|---|---|---|---|---|---|
| | From | To | | | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Interstate 215 | Mill Street | State Route 66 | 197,000 | 82 | 613 | 1,321 | 2,846 |
| Interstate 215 | State Route 66 | State Route 259 | 180,000 | 82 | 585 | 1,260 | 2,715 |
| Interstate 215 | State Route 259 | Highland Avenue | 100,000 | 80 | 469 | 1,010 | 2,175 |
| Interstate 215 | Highland Avenue | University Parkway | 94,000 | 79 | 424 | 913 | 1,967 |
| Interstate 215 | University Parkway | Palm Avenue | 74,000 | 78 | 344 | 742 | 1,598 |
| State Route 259 | Interstate 215 | State Route 210 | 42,000 | 74 | 192 | 413 | 889 |
| State Route 330 | State Route 210 | North City Limits | 13,200 | 68 | 76 | 164 | 353 |

Source: FHWA Highway Traffic Noise Prediction Model based on traffic volumes provided CalTrans 2022 AADT Truck Volumes (CalTrans 2025).

Calculations included in Appendix G

## Railroad Noise

San Bernardino's rail network is a significant contributor to urban noise, with three major routes traversing the city: the Cajon Pass Line, the MetroLink Arrow Service (extending east to Redlands), and the Main Line-Colton (running west to Colton). Additionally, Burlington Northern Santa Fe (BNSF) and Union Pacific (UP) operate key freight corridors, including the Santa Fe Subdivision Two, Subdivision Three, and Cajon Pass Lines. Noise levels vary across these routes due to differences in train frequency, speed, and operational patterns. Rail noise depends on multiple factors, including daily train volume, speed, scheduling, engine and railcar numbers, track type (continuous welded vs. bolted), and the use of warning horns at at-grade crossings. Table 3.13-10, *Approximate Train Noise Level Contours,* shows the approximate railroad noise contour distances to the 70 dBA, 65 dBA, and 60 dBA CNEL.

**Table 3.13-10 Approximate Train Noise Level Contours**

| | Distance to Noise Contour (feet) | | |
|---|---|---|---|
| Railroad | 70 dBA CNEL | 65 dBA CNEL | 60 dBA CNEL |
| Union Pacific Yuma Line | 1,325 | 618 | 285 |
| Union Pacific Palmdale Line | 600 | 279 | 130 |
| Burlington Northern Santa Fe Cajon Line | 2,025 | 941 | 440 |
| San Bernardino Metrolink Line | 1,300 | 607 | 280 |
| Inland Empire Orange County Metrolink Line | 755 | 352 | 163 |
| SCAX - San Bernardino Line | 215 | 100 | 46 |
| SCAX - Redlands Sub | 37 | 17 | 8 |

Source: Based on the Federal Highway Administration (FHWA) Horn Model.

## Airport Noise

San Bernardino International Airport (SBIA) serves as a key hub for cargo, commercial airlines, and general aviation, supporting both domestic and international operations and is located in the southeastern portion of the City of San Bernardino. Airport noise generated from large aircraft contributes to the noise environment within the City due to takeoff, flyovers/over flights, and approach/landings. To minimize disruptions, sensitive land uses like residences, schools, and hospitals should avoid areas within the airport's 65 dBA CNEL noise contour. Industrial or low-occupancy projects are more suited for these zones. Additionally, local helicopter traffic from news, emergency services, and hospitals adds to urban noise levels. Emergency flights follow FAA regulations, but routine helicopter operations contribute to the overall soundscape. San Bernardino hosts five heliports, including locations at the National Orange Show, Community Hospital, and SCE Eastern Division.

## Vibration

Railroad, commercial, and industrial operations within the City can generate varying degrees of ground vibration, depending on the operational procedures and equipment. Such equipment-generated vibrations spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the vibration source varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

## 3.13.2 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning noise and vibration. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning noise and vibration if it would:

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

b) Generate excessive groundborne vibration or groundborne noise levels.

c) For a project 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, if the project would expose people residing or working in the project area to excessive noise levels.

### THRESHOLD GUIDANCE

#### Construction Noise

The City's Noise Ordinance (Section 8.54.070 of the SBMC) establishes time restrictions where no construction activity shall occur except between the hours of 7:00 a.m. and 8:00 p.m. The City of San Bernardino does not have an established noise threshold for construction noise. The FTA provides criteria for acceptable construction noise levels and recommends a daytime noise threshold of 80 dBA Leq for residential uses, 85 dBA Leq for commercial uses, and 90 dBA Leq for industrial uses. For the purposes of this analysis, the FTA criterion is used for nearby receptors.

#### Transportation Noise

A project will normally have a significant effect on the environment related to noise if transportation noise would substantially increase the ambient noise levels for adjoining noise-sensitive areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if project-generated traffic noise increases would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher

- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

A significant cumulative traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project) and the contribution of the project to future traffic noise is calculated to be greater than 1.5 dBA to 5 dBA CNEL, based on ambient noise levels.

### Stationary Source Noise

The City's Noise Ordinance (Section 19.20.030.15 of the SBMC) establishes the maximum acceptable levels of noise for residential uses exposed to stationary source noise. Residential areas shall not exceed an exterior noise level of 65 dBA and an interior noise level of 45 dBA in any habitable room. A significant impact would occur if a proposed project would generate noise that exceeds these established City standards for sensitive land uses.

### Vibration

The City's Noise Ordinance (Section 15.68.020 of the SBMC) establishes the maximum acceptable levels of vibration for residential uses exposed to equipment or machinery of 0.7 in/sec (RMS). A significant impact would occur if a proposed project would generate vibration that exceeds established City standards for residential uses.

## METHODOLOGY

This program-level analysis evaluates the potential noise and vibration impacts from the adoption of the proposed General Plan by assessing its proposed policies and the development they would facilitate. Impacts are evaluated using the City's significance criteria and are based on traffic volume projections provided for the General Plan buildout scenario.

The analysis of construction noise from future development projects anticipated under the General Plan utilizes the FHWA Roadway Construction Noise Model (RCNM). The model is based on a representative equipment mix for standard construction activities. Given the variable nature of construction, the worst-case scenario is modeled by combining the Leq contributions from the simultaneous operation of the three loudest pieces of equipment for a given activity. Emissions are modeled from the acoustical center of a hypothetical construction site to the property line of the nearest noise-sensitive receptor.

Future traffic noise levels were calculated for roadway segments forecasted to experience the most substantial increases in traffic volume. Transportation noise levels were modeled using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model, incorporating the provided traffic volumes, projected vehicle speeds, and site conditions. The average vehicle noise emission rates were calibrated to reflect those identified for California by Caltrans

Groundborne vibration and ground-borne noise from construction are determined using FTA methodology and reference vibration levels for typical equipment (FTA, 2018). Vibration levels are modeled from the nearest disturbance area of the construction site to the foundation of the nearest sensitive receptor.

## 3.13.3 Project Impact Analysis

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

### CONSTRUCTION NOISE

### General Plan and Development Code Update

Under the proposed project, the primary source of temporary noise within the City would be demolition and construction activities associated with new development projects. Construction activities would involve both off-road demolition/construction equipment (excavators, dozers, cranes, etc.), general demolition/construction equipment (compressors, jack hammers, saws), and transport of workers and equipment to and from construction sites. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable. Table 3.13-11, Construction Equipment Noise Emission Levels, lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet from the equipment. It is noted that future development under the General Plan Update could potentially require installation of pile foundations that utilize impact pile drivers or similar equipment that generates high noise levels.

**Table 3.13-11 Construction Equipment Noise Emission Levels**

| Construction Equipment | Typical Noise Levels at 50 feet, dBA | Construction Equipment | Typical Noise Levels at 50 feet, dBA |
|---|---|---|---|
| Air Compressor | 80 | Pile-Driver (Impact) | 101 |
| Backhoe | 80 | Pile-Driver (Sonic) | 95 |
| Ballast Equalizer | 82 | Pneumatic Tool | 85 |
| Ballast Tamper | 83 | Pump | 77 |
| Compactor | 82 | Rail Saw | 90 |
| Concrete Mixer | 85 | Rock Drill | 95 |
| Concrete Pump | 82 | Roller | 85 |
| Concrete Vibrator | 76 | Saw | 76 |
| Crane, Derrick | 88 | Scarifier | 83 |
| Crane, Mobile | 83 | Scraper | 85 |
| Dozer | 85 | Shovel | 82 |
| Generator | 82 | Spike Driver | 77 |
| Grader | 85 | Tie Cutter | 84 |
| Impact Wrench | 85 | Tie Handler | 80 |
| Jack Hammer | 88 | Tie Inserter | 85 |
| Loader | 80 | Truck | 84 |
| Paver | 85 | | |

Source: FTA 2018.

dBA = A-weighted decibels.

As shown in Table 3.13-11, construction equipment generates high levels of noise, generally ranging from 76 dBA to 101 dBA at a distance of 50 feet. Average hourly noise levels associated with construction projects can vary, depending on the activities performed. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips, may also result in temporary increases in ambient noise levels at nearby receptors. During each stage of construction, a different mix of equipment would operate, and noise levels are determined by combining the Leq contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions (commonly referred to as the usage factor). Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Since the General Plan Update is a long-term planning document with no specific projects identified, specific project-level information is inherently not available, and it is not possible to quantify the estimated construction noise levels at specific sensitive receptors due to a given project. In most cases, construction of individual developments associated with implementation of the General Plan Update would temporarily increase the environment's ambient noise in the vicinity of each individual project, potentially affecting existing and future nearby sensitive uses, such as residences, parks, and schools.

All future projects are required to comply with Section 8.54.070, which prohibits construction activities between the hours of 8:00 p.m. and 7:00 a.m. Additionally, the General Plan Update policies in Table 3.13-12, *Construction Noise: Proposed General Plan Update Policies,* would help to reduce impacts with respect to construction. However, construction noise could potentially exceed the FTA 80 dBA Leq threshold, which would be considered potentially significant. Further, in some instances, such as the concrete pour of large monolithic slabs, it may not be possible to only build during certain hours. Construction activities associated with any individual development may occur near noise-sensitive receptors, and depending on the project type, equipment list, time of day, phasing, and overall construction durations, noise disturbances may occur for prolonged periods of time or during the more sensitive nighttime hours. Therefore, this impact is **potentially significant**.

**Table 3.13-12 Construction Noise: Proposed General Plan Update Policies**

| Noise Element | |
|---|---|
| N-5.1* | Require that construction activities adjacent to residential units be limited as necessary to prevent adverse noise impacts. |
| N-5.2* | Require that construction activities employ feasible and practical techniques that minimize the noise impacts on adjacent uses. |
| N-6.1* | Update the Noise Ordinance to require that construction activities employ feasible and practical techniques that minimize the noise impacts on adjacent uses. |

* Denotes mitigating policies.

**Impact NOI-1a: Buildout of the General Plan Update would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.**

**Mitigation Measure NOI-1:** Prior to any construction activity such as grading, site prep, or issuance of building permits, a note shall be provided on construction plans indicating that during construction activities and phasing the project applicant shall be responsible for requiring contractors to implement the following measures to limit construction-related noise to a performance standard of 80 dBA Leq at the property line of the nearest sensitive receptor:

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- At a minimum, the construction contractor shall implement the following control measures: improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds.
- Equipment used for project construction shall be hydraulically or electrically powered impact tools (e.g., jack hammers) wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. A muffler could lower noise levels from the exhaust by up to about 10 dBA.
- External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures shall be used (such as drilling rather than impact equipment) wherever feasible.
- The construction contractor shall not allow any construction equipment, trucks, or vehicles to idle.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.

- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

**Significance with Mitigation:** Significant and unavoidable. Implementation of Mitigation Measure NOI-1 would reduce potential noise impacts during construction to the extent feasible through implementation of construction best management practices. However, due to the potential for proximity of construction activities to sensitive uses, the number of construction projects occurring simultaneously, and the potential duration of construction activities, Impact NOI-1 (construction noise) could result in a temporary substantial increase in noise levels above ambient conditions. Therefore, project impacts would remain **significant and unavoidable.** It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

## Downtown Specific Plan

While individual projects under the DTSP may not exceed construction noise significance thresholds, the likely scale and extent of the combined construction activities associated with the future development under the DTSP would likely exceed the FTA thresholds. Overall, construction noise impacts of developments that would be accommodated by the DTSP would be **potentially significant**.

**Impact NOI-1b: Buildout of the Downtown Specific Plan would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.**

**Mitigation Measures:** Implement Mitigation Measure NOI-1.

**Significance with Mitigation:** Significant and Unavoidable. Mitigation Measure NOI-1 and the policies of the General Plan Update would reduce DTSP construction noise impact NOI-1b to the extent feasible. However, individual projects accommodated under the DTSP may exceed construction noise significance thresholds. Therefore, construction noise impacts of the DTSP would be **significant and unavoidable.**

## TRAFFIC NOISE

### General Plan and Development Code Update

Future development and activities under the General Plan Update are expected to affect the community noise environment by generating additional traffic. Traffic-source noise levels were calculated using the FHWA-RD-77-108 with traffic data provided by KOA (2025). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. Table 3.13-13, *Project-Related Increase in Traffic Noise*, shows the existing and future predicted noise levels at 50 feet from the nearest travel centerline, as well as the predicted traffic noise increase with implementation of the Specific Plan. Appendix G contains the traffic noise modeling inputs and outputs.

For roadways with existing ambient noise environments of 65 dBA CNEL and higher, an increase of 1.5 dBA CNEL or greater would be considered an impact. As shown in Table 3.13-13, there are two roadway segments, 2nd Street between Mt. Vernon Avenue and I-215 NB Ramps and Cajon Boulevard between Palm Avenue and 5th Avenue, that would experience a 2 dBA CNEL traffic noise increase with buildout of the proposed project. There are no noise sensitive land uses along the Cajon Boulevard between Palm Avenue and 5th Avenue roadway segment, however, there are existing noise sensitive residential uses along 2nd Street between Mt. Vernon Avenue and I-215 NB Ramps roadway segment. Table 3.13-14, *Traffic Noise Proposed General Plan Update Policies,* show all the policies and actions that would minimize impacts related to traffic noise. However, this impact would be **potentially significant**.

**Table 3.13-13 Project-Related Increase in Traffic Noise**

| Roadway | Segment | | dBA CNEL at 50 Feet | | | Buildout Noise Increase, CNEL | Significant Increase? |
|---|---|---|---|---|---|---|---|
| | From | To | Existing | 2050 No Project | 2050 with Project | | |
| 2nd St | Mt. Vernon Ave | I-215 NB Ramps | 69 | 70 | 72 | **2** | **Yes** |
| 2nd St | I-215 NB Ramps | E St | 74 | 74 | 74 | <1 | No |
| 3rd Street | Arrowhead Ave | Mountain View Ave | 64 | 66 | 66 | <1 | No |
| 3rd St | Waterman Ave | Lena Rd | 74 | 74 | 74 | <1 | No |
| 3rd St | Tippecanoe Ave | Del Rosa Dr | 77 | 77 | 77 | <1 | No |
| 4th St | G St | F St | 57 | 57 | 57 | <1 | No |
| W 5th St | Foothill Blvd | Flores St | 74 | 74 | 74 | <1 | No |
| 5th St | I-215 NB Ramps | Mt. Vernon Ave | 77 | 79 | 79 | <1 | No |
| 5th St | I-215 NB Ramps | H St | 76 | 77 | 77 | <1 | No |
| 5th Street | Arrowhead Ave | Mountain View Ave | 74 | 73 | 73 | <1 | No |
| 5th St | Lankershim Ave | Sterling Ave | 70 | 73 | 74 | 1 | No |
| 6th Street | G St | F St | 60 | 62 | 63 | 1 | No |
| 6th Street | Arrowhead Ave | Mountain View Ave | 54 | 55 | 56 | 1 | No |
| 40th St | Waterman Ave | Golden Ave | 67 | 67 | 67 | <1 | No |
| D Street | 6th St | 7th St | 63 | 60 | 60 | <1 | No |
| D Street | Rialto Ave | 2nd St | 60 | 62 | 62 | <1 | No |
| E St | 36th St | Base Line St | 67 | 67 | 67 | <1 | No |
| E Street | 6th St | Victoria Ave | 67 | 68 | 68 | <1 | No |
| E St | Rialto Ave | Mill St | 68 | 69 | 69 | <1 | No |
| E St | Orange Show Rd | Mill St | 72 | 72 | 72 | <1 | No |
| S E St | Sunwest Ln | Hunts Ln | 74 | 74 | 74 | <1 | No |

**Table 3.13-13 Project-Related Increase in Traffic Noise**

| Roadway | Segment | | dBA CNEL at 50 Feet | | | Buildout Noise Increase, CNEL | Significant Increase? |
|---|---|---|---|---|---|---|---|
| | From | To | Existing | 2050 No Project | 2050 with Project | | |
| F Street | 6th St | Victoria Ave | 55 | 57 | 57 | 1 | No |
| G Street | 6th St | Victoria Ave | 60 | 61 | 61 | <1 | No |
| G Street | 2nd St | 3rd St | 66 | 65 | 65 | <1 | No |
| H Street | 6th St | Victoria Ave | 65 | 67 | 68 | 1 | No |
| Arrowhead Ave | 4th St | 5th St | 65 | 67 | 68 | 1 | No |
| Auto Center Rd | E St | Fairway Dr | 69 | 69 | 69 | <1 | No |
| Baseline St | California St | Medical Center Dr | 73 | 73 | 73 | <1 | No |
| Baseline St | I-215 SB Ramps | Perris St | 74 | 74 | 74 | <1 | No |
| Baseline St | G St | Berkeley St | 76 | 75 | 75 | <1 | No |
| Cajon Blvd | Shelter Way | Kendall Dr | 70 | 71 | 71 | <1 | No |
| Cajon Blvd | Palm Ave | 5th Ave | 71 | 71 | 73 | **2** | **Yes** |
| Cajon Blvd | Darbin St | Mt Vernon Ave | 74 | 73 | 73 | <1 | No |
| Central Ave | Tippecanoe Ave | Mountain View Ave | 68 | 67 | 68 | <1 | No |
| Del Rosa Ave | Date St | Highland Ave | 73 | 71 | 71 | <1 | No |
| Del Rosa Dr | Baseline St | 9th St | 72 | 71 | 71 | <1 | No |
| Electric | 40th St | Northpark Blvd | 66 | 63 | 63 | <1 | No |
| Highland Ave | N Macy St | W City Limit | 70 | 73 | 73 | <1 | No |
| Highland Ave | H St | Mt Vernon Ave | 72 | 72 | 72 | <1 | No |
| Highland Ave | SR-259 | H St | 73 | 72 | 72 | <1 | No |
| Highland Ave | N Harrison St | Newport St | 73 | 73 | 73 | <1 | No |
| Highland Ave | Sterling Ave | Victoria Ave | 72 | 69 | 69 | <1 | No |

**Table 3.13-13 Project-Related Increase in Traffic Noise**

| Roadway | Segment | | dBA CNEL at 50 Feet | | | Buildout Noise Increase, CNEL | Significant Increase? |
|---|---|---|---|---|---|---|---|
| | From | To | Existing | 2050 No Project | 2050 with Project | | |
| W Hospitality Ln | Hunts Ln | Sunwest Ct | 69 | 69 | 69 | <1 | No |
| Hunts Ln | Redlands Blvd | Barton Rd | 74 | 73 | 73 | <1 | No |
| Inland Center Dr | I-215 NB Ramps | Adell St | 73 | 74 | 73 | <1 | No |
| Inland Center Dr | I-215 SB Ramps | I St | 73 | 73 | 73 | <1 | No |
| Kendall Dr | Palm Ave | University Pkwy | 75 | 75 | 75 | <1 | No |
| Kendall Dr | W 48th St | Little Mountain Dr | 74 | 72 | 73 | <1 | No |
| Mill St | Meridian Ave | Macy St | 72 | 71 | 72 | <1 | No |
| Mill St | I-215 SB Ramps | I St | 76 | 76 | 76 | <1 | No |
| Mill St | I-215 NB Ramps | G St | 74 | 74 | 74 | <1 | No |
| Mill St | S E St | Arrowhead Ave | 74 | 74 | 75 | <1 | No |
| Mill St | Waterman Ave | Lena Rd | 75 | 75 | 76 | <1 | No |
| Mountain View Ave | 4th St | 5th St | 54 | 56 | 56 | <1 | No |
| Mt Vernon Ave | W 16th St | Trenton St | 70 | 68 | 69 | <1 | No |
| Mt Vernon Ave | Highland Ave | Johnston St | 69 | 69 | 70 | <1 | No |
| Northpark Blvd | Ash St | Campus Pkwy | 62 | 62 | 62 | <1 | No |
| Palm Ave | Kendall Dr | Belmont Ave | 70 | 69 | 69 | <1 | No |
| Palm Ave | Highland Ave | Atlantic Ave | 67 | 66 | 66 | <1 | No |
| Rialto Ave | Mt. Vernon Ave | K St | 65 | 67 | 67 | <1 | No |
| W Rialto Ave | I-215 Crossing | E St | 70 | 71 | 71 | <1 | No |
| Rialto Avenue | Arrowhead Ave | Mountain View Ave | 64 | 65 | 65 | <1 | No |
| Sierra Way | 4th St | 5th St | 60 | 62 | 62 | <1 | No |

**Table 3.13-13 Project-Related Increase in Traffic Noise**

| Roadway | Segment | | dBA CNEL at 50 Feet | | | Buildout Noise Increase, CNEL | Significant Increase? |
|---|---|---|---|---|---|---|---|
| | From | To | Existing | 2050 No Project | 2050 with Project | | |
| State St | Highland Ave | 16th St | 71 | 72 | 72 | <1 | No |
| Tippecanoe Ave | Baseline St | 3rd St | 67 | 69 | 69 | <1 | No |
| Tippecanoe Ave | Mill St | Harry Sheppard Blvd | 78 | 80 | 80 | <1 | No |
| Tippecanoe Ave | Orange Show Rd | I-10 WB Ramp | 77 | 76 | 76 | <1 | No |
| University Pkwy | Kendall Dr | College Ave | 77 | 75 | 75 | <1 | No |
| University Pkwy | I-215 SB Ramps | Hallmark Pkwy | 75 | 73 | 74 | <1 | No |
| Waterman Ave | E 46th St | E 47th St | 76 | 76 | 76 | <1 | No |
| Waterman Ave | Marshall Ave | Highland Ave | 74 | 74 | 74 | <1 | No |
| Waterman Ave | E 16th St | E 17th St | 73 | 73 | 73 | <1 | No |
| Waterman Ave | Baseline St | 6th St | 73 | 74 | 74 | <1 | No |
| Waterman Ave | Valley St | Waterman Ave | 75 | 75 | 75 | <1 | No |
| Waterman Ave | Central Ave | Norman Rd | 76 | 75 | 75 | <1 | No |
| Waterman Ave | Orange Show Rd | Hospitality Ln | 77 | 76 | 76 | <1 | No |
| Waterman Ave | Redlands Blvd | Barton Rd | 77 | 75 | 75 | <1 | No |
| Victoria Ave | 6th St | 5th St | 67 | 67 | 67 | <1 | No |

Source: FHWA Highway Traffic Noise Prediction Model based on traffic volumes provided KOA (Appendix I-1).
Calculations included in Appendix G

**Table 3.13-14 Traffic Noise Proposed General Plan Update Policies**

| | |
|---|---|
| **Noise Element** | |
| N-4.1 | Work with Caltrans to landscape or install mitigation elements along freeways and highways adjacent to existing residential subdivisions or noise-sensitive uses to reduce noise impacts. |
| N-4.2 | Employ noise mitigation practices when designing future streets and highways, and when improvements occur along existing road segments. Mitigation measures should emphasize the establishment of natural buffers or setbacks between the arterial roadways and adjoining noise-sensitive areas. |
| N-4.3 | Require that development which increases the ambient noise level by 3 dBA or more adjacent to noise-sensitive land uses provide appropriate mitigation measures to ensure the new ambient level does not exceed this threshold. |
| N-4.4 | Require sound walls, berms, and landscaping along existing and future highways and railroad rights-of-way to beautify the landscape and reduce noise. |
| N-4.5 | Buffer residential neighborhoods from noise caused by train operations and increasing high traffic volumes along major arterials and freeways. |
| **Circulation Element** | |
| CM-5.1 | **Sensitive areas.** Where feasible, avoid truck routes on roadways that are adjacent to residential areas and other land uses that serve sensitive populations, such as schools, daycares, and medical facilities. |

**Impact NOI-2a: Buildout of the General Plan Update would expose sensitive receptors to substantial permanent traffic noise increases within the project area.**

**Mitigation Measures:** No feasible mitigation measures have been identified that would substantially reduce impacts associated with a substantial increase in traffic noise levels for all roadways showing significant impacts. However, the following measures shall be considered for mitigating or avoiding traffic noise impacts:

- **Special Roadway Paving**. Notable reductions in tire noise have been achieved via the implementation of special paving materials. For example, the California Department of Transportation (Caltrans) conducted a study of pavement noise along Interstate 80 in Davis and found an average improvement of 6 dBA to 7 dBA compared to conventional asphalt overlay (Caltrans, 2011). While technically feasible, this measure is not proposed for implementation due to the lack of a dedicated funding source and the City's limited capacity to maintain specialized pavement on applicable local roadway segments.
- **Sound Barrier Walls**. Review of aerial depictions of the impacted residential segment shows most residences along the study segment 2nd Street between Vernon Avenue and I-215 NB Ramps have direct access (via driveways) to 2nd Street. Therefore, barrier walls would prevent access to/from individual properties and would be infeasible because to be effective

the barrier needs to break the line of sight of the receptor (home) from the noise source (road) which would mean blocking the driveway.

- **Sound Insulation of Existing Residences and Sensitive Receptors**. Exterior-to-interior noise reductions depend on the materials used, the design of the homes, and their conditions. To determine what upgrades would be needed, a noise study would be required for each house to measure exterior-to-interior noise reduction. Sound insulation may require upgraded windows, upgraded doors, and a means of mechanical ventilation to allow for a "windows closed" condition. This measure is potentially feasible from a technical standpoint, but at the program-level scale of this General Plan Update, no funding mechanism or project proponent exists to implement it; however, a specific future project that generates the noise increase could be required to provide sound insulation as feasible mitigation.

**Significance with Mitigation:** Significant and unavoidable. While the above considered mitigation measures have the potential to reduce traffic noise impacts, implementation of these strategies remains infeasible. For example, impacted homes are on private property outside of the control of future project developers, so there may be limited admittance onto these properties to construct such walls. The cost versus benefit ratio in relation to the number of households benefited may not be feasible and reasonable in all cases. There are no funding mechanisms and procedures that would guarantee that the implementation of sound insulation features at each affected home would reduce an increase in traffic noise to interior areas. Therefore, impacts would remain **significant and unavoidable**. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level.

### Downtown Specific Plan

For roadways with existing ambient noise environments of 65 dBA CNEL and higher, an increase of 1.5 dBA CNEL or greater would be considered an impact. As shown in Table 3.13-13, there are no roadways within the DTSP roadway network that would experience a significant traffic noise increase with buildout of the proposed project. Traffic noise impacts of developments that would be accommodated by the DTSP would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## STATIONARY NOISE

### General Plan and Development Code Update

Stationary noise sources can be generated from new residential, office, retail, hotel, and industrial development, such as HVAC, parking structures, truck deliveries, loading docks, trash collection, human activity in open spaces and parks, and landscaping maintenance. Stationary noise sources, such as mechanical equipment or parking structures, as part of future projects under the General Plan Update would be required to comply with the exterior and interior noise level standards of the proposed Dev Code Update for residential uses. This would be achieved

through proper equipment selection, setbacks, enclosures, and/or parapet walls. Section 8.54.050 of the SBMC establishes daytime operational hours of 8:00 a.m. to 8:00 p.m. in residential zones and 7:00 a.m. and 8:00 p.m. in all other zones for loading and unloading activities, power tools, machinery, leaf blowers, street sweepers, commercial and automotive uses located adjacent to residential property. Per Section 8.54.060 of the SBMC, noise associated with emergency services, activities conducted on any public or private school, and outdoor events authorized by the city are exempt from the City's noise standards. Additionally, the policies shown in Table 3.13-15, *Stationary Noise: Proposed General Plan Update Policies,* would help to reduce noise impacts from stationary sources.

**Table 3.13-15 Stationary Noise: Proposed General Plan Update Policies**

| **Noise Element** | |
|---|---|
| N-3.1* | Update the Noise Ordinance to prohibit new development of housing, health care facilities, schools, libraries, religious facilities, and other noise sensitive uses in areas where existing or future noise levels exceed noise levels in Table N-2. |
| N-3.2* | Update the Noise Ordinance to prohibit truck deliveries to commercial properties adjacent to residential zones outside of daytime hours (7 a.m. to 10 p.m.), unless no feasible alternative exists or overriding transportation benefits necessitate off-hour operations. The updated ordinance should also ban the loading, unloading, or handling of boxes, crates, containers, building materials, garbage cans, or similar objects in a manner that creates a noise disturbance, during these same hours. Exemptions may be granted for critical deliveries or emergency operations. |
| N-3.3* | Require that all parking for commercial uses abutting residential areas be enclosed within a structure, buffered by walls, and/or limited hours of operation. |
| N-3.4* | Prohibit the development of new or expansion of existing industrial, commercial, or other uses that generate noise impacts on housing, schools, health care facilities or other sensitive uses that exceed 65 dBA Leq at the receiving residential land use property line. |
| N-3.5* | Prohibit the development of new or expanded residential or other noise-sensitive uses (e.g., schools, hospitals, senior housing) in areas where existing or planned industrial, commercial, or other noise-generating uses (e.g., airports, quarries, freight corridors) would expose them to incompatible noise levels that exceed 65 dBA Leq at the receiving land use property line, and as defined by Table N-2 and Table N-3. |
| N-5.3* | Adopt and enforce a standard for exterior noise levels for all commercial uses that prevents adverse levels of discernible noise on adjoining residential properties. |
| N-5.4* | Update the Noise Ordinance to adopt a standard for exterior noise levels from the use of leaf blowers, motorized lawn mowers, parking lot sweepers, or other high-noise equipment on commercial properties if their activity will result in noise that adversely affects abutting residential parcels. |
| N-5.5* | Update the Noise Ordinance to require that the hours of truck deliveries to commercial properties abutting residential uses be limited unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at another hour. |

* Denotes mitigating policies.

Future projects would be required to adhere with relevant SBMC and proposed Dev Code Update stationary noise standards. Therefore, this impact **is less than significant**.

**Significance without Mitigation:** Less than significant.

## Downtown Specific Plan

Stationary noise sources associated with the DTSP could also generate noise from new mixed-use residential, office, retail, and hotel land uses. Stationary noise sources as part of future projects under the DTSP would be required to comply with the exterior and interior noise level standards of the proposed Dev Code Update for residential uses and operate within Section 8.54.050 of the SBMC daytime hours of 8:00 a.m. to 8:00 p.m. in residential zones and 7:00 a.m. and 8:00 p.m. in all other zones. Future projects would be required to adhere to the SBMC and Dev Code Update stationary noise standards. Therefore, this impact **is less than significant**.

**Significance without Mitigation:** Less than significant.

## RAILROAD NOISE

## General Plan and Development Code Update

San Bernardino's rail network is a significant contributor to urban noise, with three major routes traversing the city: the Cajon Pass Line, the MetroLink Arrow Service (extending east to Redlands), and the Main Line-Colton (running west to Colton). Additionally, Burlington Northern Santa Fe (BNSF) and Union Pacific (UP) operate key freight corridors, including the Santa Fe Subdivision Two, Subdivision Three, and Cajon Pass Lines. Noise levels vary across these routes due to differences in train frequency, speed, operational patterns, track type and the use of warning horns at at-grade crossings.

Noise levels along the existing railways under the General Plan Update would remain similar to existing conditions; any changes to the frequency of trains or to train equipment would be initiated and implemented by the respective rail authority rather than the City of San Bernardino, and these rail lines are not part of the proposed project. General Plan Update policies that would aid in reducing railroad noise are shown in Table 3.13-16, *Railway Noise: Proposed General Plan Update Policies.*

**Table 3.13-16 Railway Noise: Proposed General Plan Update Policies**

| Noise Element | |
|---|---|
| N-2.1 | Partner with railroad operators to implement noise-reduction strategies, such as quiet zones and restricted air horn use, to minimize rail-related noise impacts as resources permit. |
| N-4.6 | Work with all railroad operators in the City to properly maintain lines and establish operational restrictions during the early morning and late evening hours to reduce impacts in residential areas and other noise sensitive areas. |
| N-4.7 | Support the reduction of existing railroad noise impacts at adjacent residential or other noise-sensitive uses and work with operators to install noise mitigation features. |

No aspect of the General Plan Update would increase railway noise levels along the existing railroad corridors. Adherence to the proposed General Plan policy provisions would ensure that the noise environment in San Bernardino does not increase in a manner that degrades existing noise compatibility or exposes noise-sensitive land uses to "unacceptable" noise levels. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### Downtown Specific Plan

No aspect of the DTSP would increase railway noise levels along the existing railroad corridors. Adherence to the proposed General Plan policy provisions would ensure that the noise environment in the DTSP does not increase in a manner that degrades existing noise compatibility or exposes noise-sensitive land uses to "unacceptable" noise levels. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## b) Would the project generate excessive groundborne vibration or groundborne noise levels?

### CONSTRUCTION VIBRATION

### General Plan and Development Code Update

Construction activity at project sites in the General Plan Update Area would generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest

vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures but can achieve the audible and perceptible ranges in buildings close to the construction site. However, groundborne vibration is almost never annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers (FTA 2018). Table 3.13-17, *Vibration Levels for Construction Equipment*, lists reference vibration levels for construction equipment.

**Table 3.13-17 Vibration Levels for Construction Equipment**

| Equipment | Approximate RMS Vibration Level at 25 Feet (VdB) | Approximate PPV Vibration Level at 25 Feet (in/sec) |
|---|---|---|
| Pile Driver, Impact (Upper Range) | 112 | 1.518 |
| Pile Driver, Impact (Typical) | 104 | 0.644 |
| Pile Driver, Sonic (Upper Range) | 105 | 0.734 |
| Pile Driver, Sonic (Typical) | 93 | 0.170 |
| Vibratory Roller | 94 | 0.210 |
| Large Bulldozer | 87 | 0.089 |
| Caisson Drilling | 87 | 0.089 |
| Loaded Trucks | 86 | 0.076 |
| Jackhammer | 79 | 0.035 |
| Small Bulldozer | 58 | 0.003 |

Source: FTA 2018.

Notes: in/sec = inches per second; RMS = root-mean-square; PPV = peak particle velocity; VdB = vibration decibel.

As shown in Table 3.13-17, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed SBMC Section 15.68.020 vibration standard 0.7 in/sec RMS for equipment or machinery and the FTA criteria for human annoyance architectural damage thresholds shown in Table 3.13-3 (e.g., 0.2 in/sec PPV for non-engineered timber and masonry buildings such as most residences and 80 VdB for infrequent events at buildings where people normally sleep). Construction details and equipment for future project-level developments under the General Plan Update are not known at this time but may cause vibration impacts. Therefore, this impact is **potentially significant**.

**Impact NOI-3a:** Construction activities associated with buildout of the General Plan Update may expose sensitive uses to excessive levels of groundborne vibration.

> **Mitigation Measure NOI-2:** Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, sensitive laboratory uses, or surgical clinics, 100 feet of non-engineered

timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed the City's Municipal Code Section 15.68.020 vibration standard 0.7 in/sec RMS for equipment or machinery and the FTA architectural damage thresholds (e.g., 0.12 inches per second [in/sec' peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as static rollers and pre-drilling piles, as opposed to pile driving, shall be used .

**Significance with Mitigation:** Less than significant. Implementation of Mitigation Measure NOI-2 would reduce Impact NOI-3a to a less-than-significant level. Specifically, Mitigation Measure NOI-3 would require use of alternative construction techniques for construction activities proximate to historic resources to reduce potential vibration impacts during construction to below the applicable thresholds, reducing impacts to **less than significant**.

## Downtown Specific Plan

While individual projects under the DTSP may not exceed vibration significance thresholds, the likely scale and extent of the combined construction activities associated with the future development under the DTSP would likely exceed SBMC Section 15.68.020 vibration standard and the FTA thresholds. Overall, construction vibration impacts of developments that would be accommodated by the DTSP would be **potentially significant**.

**Impact NOI-3b: Construction activities associated with buildout of the Downtown Specific Plan may expose sensitive uses to excessive levels of groundborne vibration.**

**Mitigation Measures:** Implement Mitigation Measure NOI-3.

**Significance with Mitigation:** Less than significant. Implementation of Mitigation Measure NOI-2 would reduce Impact NOI-3b to a less-than-significant level. Specifically, Mitigation Measure NOI-2 would require use of alternative construction techniques for construction activities proximate to historic resources to reduce potential vibration impacts during construction to below the applicable thresholds, reducing impacts to **less than significant**.

## OPERATIONAL VIBRATION

### General Plan and Development Code Update

Commercial and industrial operations in the City would generate varying degrees of ground vibration, depending on the operational procedures and equipment. Such equipment-generated vibrations would spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the vibration source varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

Since specific project-level information is not available at this time, it is not possible to quantify future vibration levels at vibration-sensitive receptors that may be near future vibration sources. Therefore, due to the potential for sensitive uses within the City to be exposed to annoying and/or interfering levels of vibration from commercial or industrial operations, future projects would be required to comply Section 15.68.020 of the SBMC and limit vibration at residential uses exposed to equipment or machinery to 0.7 in/sec RMS. Future projects would be required to adhere to the SBMC operational vibration standards. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### Downtown Specific Plan

Since specific project-level information is not available for individual projects of the DTSP at this time, it is not possible to quantify future vibration levels at vibration-sensitive receptors that may be near future vibration sources. Therefore, due to the potential for existing or future sensitive receptors within the DTSP area to be exposed to annoying and/or interfering levels of vibration from commercial or industrial operations. Future DTSP projects would be required to comply with Section 15.68.020 of the SBMC and limit vibration at residential uses to 0.7 in/sec RMS. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**c) For a project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As discussed previously, San Bernardino International Airport (SBIA) is located in the southeastern portion of the City of San Bernardino and serves as a key hub for cargo, commercial airlines, and general aviation operations. To minimize disruptions, sensitive land uses like residences, schools, and hospitals should avoid areas within the airport's 65 dBA CNEL noise contour. Industrial or low-occupancy projects are more suited for these zones.

Based on 2030 noise contours forecast conditions shown in Exhibit 4H of the 2010 Airport Layout Plan Narrative Report for San Bernardino International Airport, the 65 dBA CNEL noise contour extends beyond airport property to the east and west off each end of Runway 6-24. The 65 dBA CNEL contour extends west of Tippecanoe Avenue and east of the airport across Alabama Avenue. In addition, the 65 dBA CNEL and a small portion of the 70 dBA CNEL noise contours extend to the south of the airport and northwest of the existing Runway 6.

SBIA noise contour boundaries were published by the SBIAA on July 2, 2019 as part of the Eastgate Air Cargo Facility Final Environmental Assessment. Industrial land uses are generally located within the 60 dBA to 65 dBA CNEL noise level contours of the SBIA. However, there are existing and planned noise sensitive uses within the 65 dBA CNEL noise level contour of the SBIA based on the Eastgate Air Cargo Facility Final Environmental Assessment noise contour figure.

Aircraft noise sources are controlled by General Plan Policy N-4.8, as shown in Table 3.13-18, *Airport Noise: Proposed General Plan Update Policies*. that would ensure compatibility with airport operations. The development of noise-sensitive land uses within the 65 dBA Community Noise Equivalent Level (CNEL) contour of the SBIA shall be limited. Where such uses are proposed, building design must achieve interior noise levels of 45 dBA CNEL or lower in habitable rooms through noise insulation measures. For planning purposes and to remain conservative, future SBIA noise contours were based on Figure 1, San Bernardino International Airport Noise Contours, of the County of San Bernardino General Plan and will be included as part of the City of San Bernardino General Plan Update as Figure N-3, Rail and Airport Noise Contours.

**Table 3.13-18 Airport Noise: Proposed General Plan Update Policies**

| Noise Element | |
|---|---|
| N-4.8* | Ensure compatibility with airport operations, the development of noise-sensitive land uses within the 65 dBA Community Noise Equivalent Level (CNEL) contour designated in the Comprehensive Land Use Plan for the San Bernardino International Airport (SBIA): shall be limited. Where such uses are proposed, building design must achieve interior noise levels of 45 dBA CNEL or lower in habitable rooms through measures such as high-STC-rated windows, enhanced wall and roof assemblies, and acoustic insulation. Although these techniques can mitigate interior noise, exterior noise impacts from SBIA operations remain unmitigable. Multi-family residential projects may incorporate these strategies but should be carefully reviewed to ensure long-term occupant comfort given persistent outdoor noise exposure. |

* Denotes mitigating policies

Compliance with General Plan Update Policy N-4.8, would ensure future development would not be exposed to aircraft noise impacts associated with implementation of the proposed project. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

The SBIA is approximately 1.95 miles southeast of the DTSP. The SBIA airport 65 dBA CNEL noise contour does not extend into the DTSP boundaries. SBIA airport noise would not significantly affect future noise sensitive uses within the DTSP. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.13.4 Cumulative Impact Analysis

Buildout of the proposed project, in combination with past, present, and reasonably foreseeable projects, would result in potentially significant cumulative impacts with respect to noise. The analysis of the proposed project in Section 3.13.4 addresses cumulative impacts with regard to operational and construction noise as well as groundborne noise and vibration in the project area. The proposed project proposes the long-term buildout and operation of many different uses. Although multiple simultaneous nearby noise sources may, in combination, result in higher overall noise levels, this effect is captured and accounted for by the community noise level metrics that form the basis of the standards of significance for noise analysis.

**Would the project have a cumulative effect related to noise?**

Under the three CEQA significance thresholds, the project would result in significant and unavoidable impacts for Threshold (a) due to construction noise exceeding the FTA's 80 dBA Leq standard (even with mitigation) and traffic noise causing a permanent increase on two roadway segments where no feasible mitigation exists, while stationary and railroad noise impacts are less than significant.

## VIBRATION

For Threshold (b), construction vibration impacts would be reduced to less than significant through mitigation measures such as pre-construction analysis and alternative methods like pre-drilling, and operational vibration impacts would be less than significant under city code compliance. Therefore, vibration impacts would not be cumulatively considerable and would be reduced to **less than significant** with the incorporation of mitigation measures.

## AIRPORT NOISE

For Threshold (c), airport noise impacts are less than significant because the Downtown Specific Plan lies outside the airport's 65 dBA CNEL contour and General Plan policies prohibit incompatible development within that contour. Impacts associated with airport noise would not be cumulatively considerable and would be **less than significant**.

## CONSTRUCTION NOISE

Construction activities may occur simultaneously and close to noise-sensitive receptors, that could result in significant impacts. As details of individual development projects in the area are currently unknown, it cannot be determined whether Mitigation Measures NOI-1 and NOI-2 would reduce potentially significant impacts to less than significant. The proposed project would therefore contribute to cumulatively considerable construction-related noise and vibration, and cumulative impacts would be **potentially significant** and **cumulatively considerable**.

## TRAFFIC NOISE

To specifically estimate the proposed project’s contribution to traffic noise, existing noise levels were compared to those projected with completion of the proposed project. As demonstrated previously, the proposed project’s contribution to increases in ambient noise levels results in an impact for one roadway segment. Traffic noise reductions measures discussed above could reduce potentially significant impacts to less than significant, however, impacted homes are on private property outside of the control of future project developers, so there may be limited admittance onto these properties to construct such walls. Therefore, traffic noise impacts are **potentially significant** and **cumulatively considerable**.

**Impact NOI-4: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in a substantial impact related to cumulative construction noise impacts and operational traffic noise impacts.**

**Significance with Mitigation:** Significant and unavoidable. Construction noise impacts and operational traffic noise impacts associated with the proposed project would result in a cumulatively considerable contribution to noise and vibration impacts and remain **significant and unavoidable** at the plan level.

## 3.13.5 References

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# 3.14 POPULATION AND HOUSING

This section describes the potential impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), together referred to as the "proposed project", on the City of San Bernardino, including changes in population, employment, and demand for housing, particularly housing cost/rent ranges defined as "affordable."

The data used in this section to describe existing conditions and project impacts are based on the following sources.

- **United States Census Bureau.** The official US Census is described in Article I, Section 2, of the Constitution of the United States. It calls for an actual enumeration of the people every 10 years, to be used for apportionment among the states of seats in the House of Representatives. The US Census Bureau publishes population and household data gathered in the decennial census.
- **American Community Survey.** The American Community Survey is facilitated by the Census Bureau and provides estimates of population, housing, household, economic, and transportation trends between decennial censuses.
- **California Department of Finance.** The DOF prepares and administers California's annual budget. Other duties include estimating population demographics and enrollment projections.
- **California Employment Development Department.** The EDD collects, analyzes, and publishes statistical data and reports on California's labor force, industries, occupations, employment projections, wages, and other important labor market and economic data.
- **Southern California Association of Governments.** Policies, programs, employment, housing, and population projections adopted by SCAG to achieve regional objectives are expressed in the RTP/SCS.
- **Appendix B, Buildout Memorandum.** Existing and proposed housing units, jobs, non-residential square footage, and population were modeled for this EIR using a variety of data sets, including the San Bernardino Transportation Analysis Model (SBTAM), as discussed in Appendix B.

## 3.14.1 Regulatory Framework

### STATE

### California Government Code

California Government Code Section 65300 describes the scope and authority of local jurisdictions to prepare, adopt, and amend general plans. Communities prepare general plans to guide the long-term physical development of the jurisdiction and any land within the jurisdiction's sphere of influence. At a minimum, the California Government Code requires general plans to address land use, circulation, housing, noise, conservation, open space, and safety issues.

Additionally, the California Government Code assigns equal importance to each general plan element and requires general plan elements to be internally and externally consistent, meaning that policies between elements should not be in conflict with one another, nor should subsequent plans or implementation programs, such as the zoning ordinance, capital improvement plan, or specific plans, conflict with general plan policies.

The housing portion of the general plan is expected to analyze existing and protected housing needs, examine special housing needs, evaluate the effectiveness of current goals and policies, identify constraints to providing affordable housing, identify land available in the jurisdiction to accommodate the jurisdiction's share of the regional housing need, and identify opportunities to incorporate energy and conservation measures into the housing stock. The housing element is the only portion of the general plan that has a statutory requirement to be reviewed and certified by a state agency and must be updated within a specified time period on a 4- or 8-year cycle.

### The Housing Accountability Act

The Housing Accountability Act (HAA) was passed in 1982 and amended under Assembly Bill 678 and Senate Bill 167 in 2017 with the aim to limit the ability of local government to restrict the development of new housing. Specifically, the HAA prohibits a local agency from disapproving, or conditioning approval in a manner that renders infeasible, a housing development project for very low, low-, or moderate-income households or an emergency shelter unless the local agency makes specified written findings based on a preponderance of evidence in the record.

The act specifies that one way to satisfy that requirement is to make findings that the housing development project or emergency shelter is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation as specified in any element of the general plan as it existed on the date the application was deemed complete. A local agency that proposes to disapprove a housing development project that complies with applicable, objective general plan

and zoning standards and criteria that were in effect at the time the application was deemed to be complete, or to approve it on the condition that it be developed at a lower density, must base its decision upon written findings supported by substantial evidence on the record that specified conditions exist, and places the burden of proof on the local agency to that effect. If the local agency fails to provide this documentation, these bills provide that the housing development project would be deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision.

### The Housing Crisis Act

Senate Bill 330 (SB 330), or the Housing Crisis Act of 2019, aims to address California's housing shortage by expediting the approval process for housing development of all types, particularly in regions suffering the worst housing shortages and highest rates of displacements. To address the crisis, this bill prohibits some local discretionary land use controls currently in place and generally requires cities to approve all housing developments that comply with current zoning codes and general plans. SB 330 requires that a housing development project only be subject to the ordinances, policies, and standards adopted and in effect when a preliminary application is submitted, notwithstanding the provisions of the HAA or any other law, subject to certain exceptions.

## REGIONAL

### Southern California Association of Governments

SCAG is the nation's largest metropolitan planning organization (MPO), representing 6 counties, 191 cities, and more than 19 million residents. SCAG undertakes a variant of planning and policy initiatives to encourage a more sustainable Southern California. The SCAG region includes the county of San Bernardino and the City of San Bernardino. SCAG is a regional council whose purpose is to create a more sustainable Southern California through planning and policy initiatives.

#### *Regional Transportation Plan/Sustainable Community Strategy*

As part of the Regional Transportation Planning (RTP) process that occurs every 4 years, SCAG is responsible for determining the growth in housing, employment, and population across the region and for identifying efficient and effective methods to accommodate that growth. On April 4, 2024, SCAG adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal 2024"). This long-range plan, which is a requirement of the state of California and the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change.

### *Growth Forecast*

A component of the Connect SoCal 2024 is a set of growth forecasts that estimate employment, population, and housing growth. These estimates are used by SCAG, transportation agencies, and local agencies to anticipate and plan for growth.

This growth forecast developed at multiple spatial scales with the primary objective of developing the socioeconomic data used to model federally and state-mandated transportation and air quality outcomes over 2019 to 2050 (see Section 5.3, *Air Quality*). The demographic/economic forecast of population, households, and employment is developed at the regional and county levels. The small-area forecast of households and employment is developed at the jurisdiction and transportation analysis zone (TAZ) levels and relies primarily on local land use data and existing housing and employment data to allocate county-level growth. Connect SoCal 2024's growth forecast is the starting point for reaching plan objectives. In past cycles, SCAG developed scenarios based on priority growth areas and constraint areas after the conclusion of local review. In contrast, the preliminary growth forecast for Connect SoCal 2024 sought to integrate growth strategies from prior plans as well as other-local development plans associated with the 6th-cycle housing element update. The objective is to strengthen the connection between regional objectives and local policies that are reasonably foreseeable during the Connect SoCal 2024 horizon (SCAG 2023).

## San Bernardino Council of Governments

SBCOG is an association of local governments in the San Bernardino County region. SBCOG partners with twenty-four cities in its jurisdiction, including the City of San Bernardino. SBCOG provides transportation and sustainability planning for the region as well as serves as a collective voice on regional issues.

# LOCAL REGULATIONS

## City of San Bernardino 2021-2029 Housing Element

The City of San Bernardino's 6th Cycle Housing Element was adopted on February 2024. The Housing Element includes policies and goals that guide housing throughout the city:

- Facilitate the development of safe, high-quality housing that is diverse in type, size, price, tenure, and location for all residents.
- Reduce, mitigate, or remove governmental and nongovernmental constraints to the production, maintenance, and improvement of housing.
- Neighborhoods of well-maintained homes, public services and facilities, parks and open spaces, and infrastructure that provide safe, healthful, and quality places to reside.

- Assist in the provision of affordable housing through homeowner and rental assistance, preservation of affordable housing, deed-restricting new affordable housing, and other efforts to improve housing affordability and housing security.

- Affirmatively further fair housing opportunity for all residents in San Bernardino through policy, outreach and education programs, and funding.

The Housing Element also details the City's Regional Housing Needs Allocation (RHNA), which determines the amount of housing that each local government must plan for in their housing elements. For the 6th Cycle Housing Element, the City was allocated a final housing planning goal of 8,123 housing units. The Housing Element also identifies all sites designated by the land use element and within the city that were used to meet the RHNA obligations. This inventory also includes sites that would be redesignated and rezoned under the proposed General Plan Update, such as in the DTSP.

### City of San Bernardino Development Code

Article II, Zones, and Article III, General Regulations, of the City's existing Development Code serve as the implementation component of the General Plan to ensure the orderly development of the city and to protect, promote, and enhance the public health, safety, and general welfare. The Zoning Ordinance establishes standards and procedures for development in each zoning district, including height, setback, housing density, yard, parking, walls, landscaping, and land use standards.

In addition to an affordable housing density bonus detailed in Chapter 19.04.030, Development Standards, the City's code allows a 15 percent increase in the maximum permitted density for projects that provide amenities in excess of those required by their applicable land use zone.

## 3.14.2 Existing Conditions

### CITYWIDE AREA

### Population and Housing

For informational purposes, Table 3.14-1, *Population and Housing Trends in the City of San Bernardino*, shows population and housing trends in the City based on population and housing estimates from the Department of Finance (DOF) between 2015 and 2025. Over the ten-year period, the city population generally increased from 2015 to 2021, decreased between 2021 and 2023, and saw the largest growth year between 2023 and 2024. Housing units have generally increased from 2015 through 2025, with the exception of 2018 to 2019, which saw a small decrease in housing units. Vacancy rates and persons per unit have gradually decreased

over the same period. The ratio of single family to multiple family homes remained fairly consistent, with 70 percent single-family residences and 30 percent multi-family residences.

**Table 3.14-1 Population and Housing Trends in the City of San Bernardino**

| Year | Percentage Change in Population (Year to Year) | Percentage Change in Housing Units (Year to Year) | Percentage of Single-Family Residences | Percentage of Multi-family Family Units | Vacancy | Persons per Unit |
|---|---|---|---|---|---|---|
| 2015 | -- | -- | 70% | 30% | 6.29% | 3.45 |
| 2016 | 0.43% | 0.29% | 70% | 30% | 5.93% | 3.44 |
| 2017 | 0.60% | 0.19% | 69% | 31% | 5.36% | 3.43 |
| 2018 | 0.25% | 0.06% | 69% | 31% | 4.74% | 3.42 |
| 2019 | 0.10% | -0.03% | 70% | 30% | 4.39% | 3.42 |
| 2020 | 0.44% | 0.26% | 70% | 30% | 3.93% | 3.40 |
| 2021 | -0.75% | 0.05% | 70% | 30% | 3.93% | 3.39 |
| 2022 | -0.25% | 0.36% | 70% | 30% | 4.00% | 3.37 |
| 2023 | -0.10% | 0.26% | 70% | 30% | 3.90% | 3.35 |
| 2024 | 0.86% | 0.68% | 70% | 30% | 3.90% | 3.35 |
| 2025 | 0.07% | 0.56% | 70% | 30% | 3.90% | 3.34 |

Sources: DOF 2025a, 2025b.

### *Regional Housing Needs Assessment*

As described above, State law requires that a community provide adequate sites with residential development potential to allow for and facilitate production of the City's regional share of housing needs. To determine whether the City has sufficient land to accommodate its share of regional housing needs for all income groups, the City must identify "adequate vacant and underutilized sites." Under State law (California Government Code section 65583[c][1]), adequate sites are those with appropriate zoning and development standards and with services and facilities to facilitate and encourage the development of a variety of housing for all income levels. As shown in Table 3.14-2, *City of San Bernardino 2021-2029 Regional Housing Needs Assessment,* the City of San Bernardino's RHNA for the 2021-2029 planning period, as determined by SCAG, is 8,123 housing units—1,415 units for very low-income households, 1,907 units for low-income households, 1,448 units for moderate income households, and 4,163 units for above moderate-income households.

The Housing Element identified capacity for 9,035 housing units in the city—2,464 lower income units, 1,940 moderate income units, and 4,449 above moderate incomes units—of which 1,145 are on sites that would require rezoning to support the planned capacity. Changes in State law (SB 166 and SB 1333) require local jurisdictions to continue to monitor their ability to accommodate their RHNAs as development occurs on available sites at an intensity or income level not consistent with the assumptions in the Housing Element. To address this requirement, the City's sites inventory includes a surplus of 912 units over its RHNA.

**Table 3.14-2 City of San Bernardino 2021-2029 Regional Housing Needs Assessment**

| Income Category | Number of Housing Units | Percentage of Total |
|---|---|---|
| Very Low | 1,415 | 17.4% |
| Low | 1,907 | 23.5% |
| Moderate | 1,448 | 17.8% |
| Above Moderate | 4,163 | 51.25% |
| Total Allocation | 8,123 | 100% |

Source: SCAG 2021.

## Employment

According to the California Employment Development Department (EDD), the rate of employment in the city has increased over the last decade, growing 32 percent between 2014 and 2024. Despite an approximately 5 percent drop in 2020, the EDD reports that employment surpassed pre-pandemic levels at 83,700 jobs in 2022 and has continued growing. Annual employment estimates and yearly percentage changes are shown in Table 3.14-3, *City of San Bernardino Employment Trends*.

As shown in Table 3.14-4, *City of San Bernardino, Industry by Occupation, 2023*, the City had a total employed civilian workforce (16 years and older) of 100,295, according to estimates by the US Census Bureau. The largest occupational sector in 2023 was Educational Services, and Health Care and Social Assistance, comprising approximately 23 percent of the workforce. The second and third largest sectors, transportation, warehousing, utilities and retail trade, made up 14 percent and 12 percent of the workforce, respectively.

**Table 3.14-3 City of San Bernardino Employment Trends**

| Year | Estimated Employment | Percent Change |
|---|---|---|
| 2014 | 73,700 | -- |
| 2015 | 76,000 | 3.12% |
| 2016 | 88,100 | 15.92% |
| 2017 | 89,900 | 2.04% |
| 2018 | 91,500 | 1.78% |
| 2019 | 92,500 | 1.09% |
| 2020 | 87,800 | -5.08% |
| 2021 | 90,400 | 2.96% |
| 2022 | 94,700 | 4.76% |
| 2023 | 96,800 | 2.22% |
| 2024 | 97,500 | 0.72% |

Source: EDD 2025.

**Table 3.14-4 City of San Bernardino, Industry By Occupation, 2023**

| Industry/Occupation | Employment | Percent of Total |
|---|---|---|
| Agriculture, forestry, fishing and hunting, and mining | 171 | 0.2% |
| Construction | 10,057 | 10.0% |
| Manufacturing | 6,540 | 6.5% |
| Wholesale trade | 2,011 | 2.0% |
| Retail trade | 11,948 | 11.9% |
| Transportation and warehousing, and utilities | 14,014 | 14.0% |
| Information | 1,923 | 1.9% |
| Finance and insurance, and real estate and rental and leasing | 2,123 | 2.1% |
| Professional, scientific, and management, and administrative and waste management services | 9,472 | 9.4% |
| Educational services, health care and social assistance | 22,522 | 22.5% |

**Table 3.14-4 City of San Bernardino, Industry By Occupation, 2023**

| Industry/Occupation | Employment | Percent of Total |
|---|---|---|
| Arts, entertainment, recreation, and accommodation and food services | 8,543 | 8.5% |
| Other services, except public administration | 6,593 | 6.6% |
| Public administration | 4,378 | 4.4% |
| **TOTAL** | **100,295** | **100%** |

Source: Census 2023a.

## *Job-Housing Balance*

The ratio of jobs to housing is important because an imbalanced ratio can lead to physical impacts on the environment. The "job-housing ratio" or "jobs-housing balance" is measured by comparing the total number of jobs to the number of housing units a defined geographic area. The jobs-housing balance has implications for mobility, air quality, and the distribution of tax revenues and is one indicator of a project's effect on growth and quality of life in the project area. There is no ideal ratio adopted in state, regional, or city policies. The American Planning Association (APA) is a resource for community planning best practices, and has provided the following recommendations for assessing jobs-housing balance (Weitz 2003):

- Jobs-housing ratio
  - Recommended target: 1.5 jobs per housing unit
  - Recommended range: 1.3 to 1.7 jobs per housing unit
- Jobs-employed resident ratio
  - Recommended target: 1 job per employed resident
  - Recommended range: 0.8 to 1.25 jobs per employed resident

The APA recognizes that an ideal ratio will vary across jurisdictions and that, beyond the numerical ratio, it is also important for there to be a match between the types of jobs available in a community, the skills of the local labor force, and the characteristics of available housing, such as price, size, and location (Weitz 2003). The ratio of jobs to housing is a means of determining the general economic health of a region. SCAG applies the jobs-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. A focus of SCAG's regional planning efforts has been to improve this balance; however, jobs-housing goals and ratios are only advisory. As shown in Table 3.14-5, *Existing Jobs-Housing Ratio*, based on existing conditions, the City's jobs-housing ratio is 1.45, which is considered

balanced using the APA's recommended range target of 1.5 jobs per housing unit, or recommended range: 1.3 to 1.7 jobs per housing unit.

**Table 3.14-5 Existing Jobs-Housing Ratio**

| Scenario | Existing Conditions |
|---|---|
| Housing Units | 77,051 |
| Jobs | 111,690 |
| Jobs-Housing Ratio | 1.45 |

Sources: Appendix B.

## Growth Projections

SCAG undertakes comprehensive regional planning with an emphasis on transportation, producing an RTP/SCS. The 2024–2050 RTP/SCS provides projections of population, households, and total employment for the City of San Bernardino. Based on its share of California's and the region's employment growth, migration and immigration trends, and birth rates, SCAG projects that population, households,[1] and employment will grow at an increasing rate in San Bernardino. These projections are summarized in Table 3.14-6, *SCAG Growth Projections for the City of San Bernardino*. SCAG projects an increase of 15,965 (6 percent) in population, 7,749 (10 percent) in households, and 29,210 (26 percent) in jobs in 2050 compared to existing conditions.

[1] A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit, such as partners or roomers, is also counted as a household (SCAG 2024).

**Table 3.14-6 SCAG Growth Projections for the City of San Bernardino**

| | Existing Conditions[1] | SCAG 2050 Projections[2] | Net Difference (Percent) |
|---|---|---|---|
| Population | 267,267 | 283,232 | 15,965 (6%) |
| Households | 74,046 | 84,800 | 7,749 (10%) |
| Employment | 111,690 | 140,900 | 29,210 (26%) |

1. See Table 2-3, General Plan Update Buildout Summary; households estimated by applying the city's 2025 vacancy rate estimated by the DOF (3.9 percent, see Table 3.14-1) to the existing housing units in the city (77,051).
2. Source: SCAG 2023. Population estimated by multiplying the SCAG 2050 households by the city's 2025 persons per household estimated by the DOF, 3.34 (see Table 3.14-1).

### DOWNTOWN AREA

Table 3.14-7, *Downtown Specific Plan Area Existing Development*, shows the housing units, non-residential square feet, and other population characteristics calculated for existing conditions in the DTSP Area by using the methodology of the General Plan Update buildout (see Appendix B). These estimates differ from the Census estimates and provide a more precise estimate of existing housing units and non-residential space in the DTSP Area based on transportation analysis zones. The population, housing, and employment characteristics in Table 3.14-7 will be used for the impact analysis in this section.

**Table 3.14-7 Downtown Specific Plan Area Existing Development**

| | Existing Conditions |
|---|---|
| Housing Units | 1,315 |
| Population | 5,293 |
| Households | 1,465 |
| Non-residential Square Feet | 3,840,449 |
| Employment | 10,850 |

Source: See Appendix B.

## Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form**, includes questions concerning population and housing. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning population and housing if it would:

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.

### METHODOLOGY

Population and housing impacts under Impact Discussion (a) are assessed by comparing the proposed project's buildout to relevant projections and policies related to growth in the City, region, and State. While these projections provide a benchmark by which to assess the growth anticipated under the proposed project for informational purposes, they do not represent the threshold for determining significant impacts. The General Plan is the City's overarching planning document and is based on the amount of reasonably foreseeable growth in the city; therefore, adoption of this General Plan Update would not induce "substantial unplanned growth" in the city. Similarly, the DTSP, which is consistent with the General Plan Update, would guide and plan for growth within the DTSP area. While implementation of both the DTSP and General Plan Update would result in growth in their respective areas, these documents provide plans to ensure this growth is managed in accordance with their visions.

## 3.14.3 Project Impact Analysis

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

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

One of the purposes of a general plan is to adequately plan for and accommodate future growth. As shown in Table 3.14-8, *Buildout Comparison of Existing Conditions to the General Plan Update*, implementation of the General Plan Update would allow for an increase of 35,940 housing units, 63,715 residents, and 60,500 jobs over approximately 20 years (see Appendix B, *Buildout Memorandum*).

**Table 3.14-8 Buildout Comparison of Existing Conditions to the General Plan Update**

| | Existing Conditions (2025) | General Plan Update (2050) | Net Difference |
|---|---|---|---|
| Population | 267,267 | 330,982 | 63,715 |
| Housing Units | 77,051 | 112,991 | 35,940 |
| Households[1] | 74,046 | 108,584 | 34,538 |
| Jobs | 111,690 | 172,190 | 60,500 |
| Jobs-Housing Ratio | 1.45 | 1.5 | 0.05 |

Source: Appendix B.

1. Households estimated by applying the City's 2025 vacancy rate estimated by the DOF (3.9 percent, see Table 3.14-1) to the existing and proposed housing units.

## Housing and Population

At the projected buildout, there would be 112,991households and 330,982people in San Bernardino. As shown in Table 3.14-9, *Buildout Comparison of the General Plan Update to SCAG Projections*, the forecast population and households (330,982 persons and 108,584 households) exceed the SCAG growth projections (283,232 persons and 84,800 households) by 17 percent and 28 percent, respectively.

It is important to note the differences between project buildout and SCAG projections. SCAG projections are used in this analysis for general comparison purposes. Buildout of the city is not linked to a development timeline and is based on a reasonable expectation of development in the city as a result of implementing the proposed Land Use Plan under the General Plan Update over the course of the next 25 years. The General Plan Update is a regulatory document that sets the framework for future growth and development in the city and does not directly result in development. Its purpose is to ensure orderly and controlled growth in the city and SOI by outlining how, where, and what growth can occur. SCAG's projections are based on data and input from jurisdictions available at the time it was prepared in 2022. Connect SoCal 2024 notes that its projections represent a "snapshot in time," and as such, reflect the land uses of the City's existing 2005 General Plan Land Use Plan and housing element sites in the 5th Cycle Housing Element (SCAG 2024). Connect SoCal is updated every 4 years and its next update cycle will reflect local land use and policy changes made since 2022. Therefore, an exceedance of SCAG's projections in this context does not necessarily signify substantial unplanned growth.

**Table 3.14-9 Buildout Comparison of Existing Conditions to the General Plan Update**

| | SCAG Projections (2050) | General Plan Update (2050) | Net Difference (Percent) |
|---|---|---|---|
| Population | 283,232 | 330,982 | 47,750 (17%) |
| Households[1] | 84,800 | 108,584 | 23,784 (28%) |
| Jobs | 140,900 | 172,190 | 31,290 (22%) |

Source: Appendix B.

1. Households estimated by applying the City's 2025 vacancy rate estimated by the DOF (3.9 percent, see Table 3.14-1) to the existing and proposed housing units.

Furthermore, because the proposed project includes a citywide general plan that dictates where and how much housing is allowed to be developed in the city, it should be noted that the state of California has a shortage of housing. Within the last decade, numerous housing-related bills have been passed and signed into law by the California legislature, as discussed in Section 3.14.1, *Regulatory Framework*. These regulations signal the State's priority to address the shortage. Several of these regulations already allow increased housing capacity beyond what is allowed under a jurisdiction's land use regulations (i.e., density bonus law, accessory dwelling unit provisions, SB 330, etc.). The City does not have the authority to countermand State regulations. Because it is not possible to know which projects will use a density bonus, buildout of the General Plan Update, as shown in the tables above, does not account for the increase in housing capacity as a result of State laws.

As discussed in Chapter 2, *Project Description*, of this DEIR, the buildout of the General Plan Update is consistent with the City's 2024 6th Cycle Housing Element, which implements the City's RHNA target. The proposed Land Use Plan targets changes at sites that satisfy the City's State-mandated obligation to demonstrate it can meet its RHNA for housing. The City's Housing Element and the Land Use and Urban Form Element also include policies to support a variety of housing types and densities, as shown in Table 3.14-10, *Population and Housing Growth: General Plan Update Policies*.

**Table 3.14-10 Population and Housing Growth General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LU-8.1 | **Foundation for accommodating growth.** Accommodate growth that aligns with community values, complements the scale and character of City neighborhoods, business districts, and environment, and is consistent with the categories and standards of land uses depicted on the Land Use Map (Figure LU-1). |
| LU-8.2 | **Infrastructure supporting development and services**. Coordinate the location and timing of new development and redevelopment of existing properties to ensure that the capacities of infrastructure, public facilities, and services are sufficient to meet their needs concurrent with the completion of new development. |
| LU-8.3 | **Distinct identities of districts**. Establish and maintain distinct identities for activity centers, neighborhoods, corridors, and districts to reflect their location, history and culture, mix of uses, and targeted markets, differentiating these by use, scale and form. |
| LU-8.4 | **Focused development.** Focus growth and development in downtown, along commercial corridors, in commercial and mixed-use centers, adjoining transit corridors/ stations and near major community anchors such as Orange Show/ stadium and California State University. |
| LU-8.5 | **Transit-oriented development**. Plan for transit-oriented development by encouraging future development activity within 1/2 mile of the sbX line, primary transit corridors, and major activity/employment centers, including Downtown San Bernardino. |
| LU-8.6 | **Balanced land uses.** Maintain a balance mix of land use designations that allows for the full range of housing, commerce, services, and institutional needs required for San Bernardino to be a community of choice; amend the Land Use Plan as necessary to achieve this objective. |
| LU-8.7 | **Fiscal impacts of growth**. Require developers seeking land use changes for their projects to prepare a fiscal impact analysis to identify the proportional level of services needed to support their projects via impact fees, assessments, improvements, and so forth. |

## Employment

The proposed project would allow for 41,168,362 square feet of additional non-residential development. The development would consist of job-generating land uses, such as commercial, office, industrial, and institutional uses. These uses are estimated to generate a total of 60,500 new jobs. The forecast for employment in the city at buildout of the General Plan Update (172,190 jobs) would exceed the SCAG growth projections (140,900 jobs) by 22 percent. As shown in Table 3.14-10, the Land Use and Urban Form and Economic Development Elements identify several policies aimed at promoting employment growth for San Bernardino residents, such as Policies LU-6.3, LU-6.9, and LU-6.21. Though these new jobs would induce population growth in the city, this growth would be balanced by the increase in housing growth, as described below. Similar to housing growth in the city, the proposed General Plan Update is intended to direct and ensure planned growth with respect to job-generating land uses.

## Jobs-Housing Balance

As stated above, buildout of the General Plan Update would result in 172,190 jobs and 35,940 residential units in the City. The City's job-housing ratio would increase from 1.45 to 1.5, which would meet the APA's recommended target of 1.5 jobs per housing unit. The proposed project would introduce more job-generating land uses than are currently available. Therefore, though buildout of the proposed General Plan Update would directly and indirectly induce population and employment growth, the jobs-housing ratio in the City would improve with implementation of the General Plan Update compared to both existing conditions and SCAG projections.

## Summary

Implementation of the General Plan Update would directly induce population and employment growth in the City while improving the jobs-housing balance. The proposed General Plan Update plans for this future growth by requiring infrastructure and public services to accommodate the projected growth (see Section 3.15, *Public Services*; Section 3.17, *Transportation*; and Section 3.19, *Utilities and Service Systems*). The proposed General Plan Update, furthermore, does not propose any actions that would lead to indirect growth outside of or in the city. Growth in the city would be subject to the proposed Land Use Plan and other growth-related policies, and growth in areas in the vicinity of the city would be subject to the general plans of their respective cities and county.

It is important to note that the General Plan Update is a regulatory document that sets the framework for future growth and development in the plan area and does not directly result in development. Its purpose is to ensure orderly and controlled growth in the plan area. The SCAG projections are based on data and input from local jurisdictions available at the time of preparation in 2022. Connect SoCal 2024 notes that its projections represent a "snapshot in time" and as such, reflect the City's existing 2005 General Plan Land Use Plan and 5th Cycle Housing Element (SCAG 2024). Connect SoCal is updated every four years, and its next update cycle will reflect local land use and policy changes made since the previous update. Nonetheless, as the regional source of population projections relevant to the context of the proposed project, the project's exceedance of these projections would signify substantial population growth.

Proposed policies under the General Plan's Housing and Land Use Elements would ensure the city supports a variety of housing types and densities and provides job growth to accommodate residents. Updates to the City's Development Code would include modifications for consistency with the proposed General Plan Update, recently adopted Housing Element, and State laws such as Senate Bills 35 and 330. These modifications would not involve land-use changes that would cause a greater increase in population and employment growth than what is considered under the General Plan Update. Since buildout in accordance with the General Plan Update would result in population, housing, and job growth that exceeds SCAG's projections for the City, the

proposed project is considered to result in substantial growth. Therefore, this impact is **potentially significant**.

**Impact POP-1a: Buildout of the General Plan Update would result in substantial growth that exceeds regional projections for growth in the City.**

**Mitigation Measures:** Because population, housing, and employment growth in accordance with buildout of the proposed project is an unchangeable feature of the proposed project, there are no mitigation measures available to reduce impacts.

**Significance without Mitigation**: Significant and Unavoidable. The proposed project would exceed regional projections for growth in the City, thereby resulting in substantial growth beyond what was anticipated at the regional level. No mitigation measures are available to address this impact and therefore growth impacts would remain **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

### Population and Housing

The DTSP would allow for the construction of up to 14,152 new dwelling units. These new dwelling units would result in approximately 35,618 new residents in the DTSP Area. As shown in Table 3.14-11, *Buildout Comparison of Existing Conditions to the Downtown Specific Plan*.

**Table 3.14-11 Buildout Comparison of Existing Conditions to the Downtown Specific Plan**

| | Existing Conditions | Downtown Specific Plan Buildout (2050) | Net Difference |
|---|---|---|---|
| Population | 5,293 | 40,912 | 35,618 |
| Housing Units | 1,315 | 15,467 | 14,152 |
| Households | 1,465 | 13,367 | 11,902 |
| Non-Residential Square Feet | 3,840,449 | 15,573,306 | 11,732,857 |
| Jobs | 10,850 | 21,839 | 10,989 |
| Jobs-Housing Ratio | 8.25 | 1.4 | 7.11 |

Source: Appendix B.

This development would result in a 673 percent increase in the existing population and a 1,076 percent increase in housing units. The increase in population assumes that all new

residents of the DTSP Area would be new residents to the city and does not account for the current residents relocating from other parts of the city.

Under existing conditions, the population of the DTSP Area represents approximately 2 percent of the total population of the City (267,267 residents citywide under existing conditions; see Table 3.14-8). By 2050, under implementation of the proposed General Plan Update, the DTSP Area would contain 14 percent of the total population of the city (330,982 residents citywide in 2050; see Table 3.14-8); 14 percent of SCAG's 2050 projection for the City is 39,652 residents. The population growth in the DTSP would exceed this projection by 1,259 residents.

Under 2050 buildout conditions, the DTSP is projected to contain 12.3 percent of the City's households (108,584 households citywide by 2050; see Table 3.14-8); 12.3 percent of SCAG's 2050 projection for households in the City is 10,430 households. The DTSP's increase to 13,367 households by 2050 would therefore exceed the SCAG projection by 2,937 households.

Similar to the proposed General Plan Update, the DTSP provides a planning framework to manage and guide growth within its planning area. The specific plan would provide for a substantial increase in population and households/housing units in the DTSP Area, beyond existing conditions and SCAG projections because it is intended to accommodate a large portion[2] of the City's proposed General Plan Update housing capacity, including housing capacity needed to meet the City's RHNA target. The DTSP includes land use standards, development standards, design guidelines, and utilities analyses, and other plans that would ensure properly planned growth in the DTSP Area. As applicable, development in the DTSP Area would also be subject to the General Plan Update policies discussed in Table 3.14-10. While growth projected from its buildout would not be "unplanned", it would exceed applicable regional projections and result in substantial growth..

## Employment

The DTSP would result in a net increase of approximately 11.7 million square feet of non-residential space. This is estimated to add 10,989 new jobs in the DTSP Area. When compared to existing conditions in the area, jobs would increase by 101 percent by buildout. These jobs would account for approximately 13 percent of the total jobs in the city under buildout of the General Plan Update. Thirteen percent of SCAG's projections for jobs citywide by 2050 is 18,317 jobs. Therefore, the DTSP's projection of total 21,839 jobs by 2050 would exceed the SCAG projection by 3,522. Similar to job generation under the General Plan Update, the DTSP's job growth would introduce new residents to the city. As discussed below, the housing capacity increase under the DTSP would largely accommodate this increase in new employees because it would allow more opportunities for people who work in the DTSP Area to live there. Overall,

[2] The DTSP area makes up 1.6 percent of the total land area within the city and would accommodate 14 percent of the housing unit and population growth within the city under buildout conditions.

since the increase in employees under the DTSP is planned for in the DTSP itself, it would not result in "unplanned" population growth, but due to its exceedance of the regional projections, it would be considered substantial growth.

## Jobs-Housing Balance

As shown in Table 3.14-11, the DTSP area under existing conditions has over eight times more jobs than housing units. The DTSP area has historically been a jobs center and hosts many of the city and county governmental operations. A majority of its land uses only allow non-residential uses. The DTSP would accommodate a significant increase in housing capacity in the DTSP Area by allowing for more mixed-use and residential land uses in underutilized areas. Under the DTSP, the DTSP Area would continue to be jobs rich but would accommodate a far more balanced jobs-housing balance of 1.4 jobs for each housing unit.

Though no definitive value is recognized as the optimal jobs-housing ratio for a jurisdiction, numerous studies have indicated that a higher jobs-housing ratio results in increased vehicle-miles traveled (SCAG 2001). Jobs-housing balance, as a transportation policy tool, is premised on the idea that when residence and work locations are closer together, people's travel distance to and from work will be reduced (Boarnet, Hsin-Ping and Handy 2014). Under the DTSP, the planning area's jobs-housing balance would decrease by 86 percent from existing conditions because the DTSP's increase in housing capacity would allow a larger number of current and future employees in the DTSP Area to live there as well. This jobs-housing ratio would also reflect the City's overall jobs-housing balance under the proposed General Plan Update, indicating that the DTSP would contribute to a more balanced distribution of housing and employment in the citywide planning area. As discussed in Section 3.17, *Transportation*, VMT in the DTSP Area as a result of implementing the DTSP would be less than significant, indicating that the DTSP's improvement of the jobs-housing balance aids in reducing VMT impacts.

## Summary

Like the proposed General Plan Update, the DTSP would accommodate new housing units and non-residential space, allowing for an increase in population within the DTSP Area. The DTSP provides plans to service all projected growth within its planning area, and because the DTSP Area is fully contained within the city, the plan would not introduce infrastructure or other types of development that indirectly cause population growth elsewhere—all growth within the City would be regulated by the proposed General Plan Update. The DTSP would improve the jobs-housing balance, provide more opportunities for housing in the DTSP Area, and allow jobs to grow as well. While the DTSP provides a plan to guide growth in this area of the City, it would still exceedance SCAG's regional projections for growth in the City resulting in **potentially significant** impacts.

**Impact POP-1b: Buildout under the Downtown Specific Plan would result in substantial growth that exceeds regional projections for growth in the City.**

**Mitigation Measures:** Because population, housing, and employment growth in accordance with buildout under the DTSP is an unchangeable feature of the project, there are no mitigation measures available to reduce impacts.

**Significance without Mitigation**: Significant and Unavoidable. Buildout of the DTSP would exceed regional projections for growth in the City, thereby resulting in substantial growth beyond what was anticipated at the regional level. No mitigation measures are available to address this impact and therefore growth impacts would remain **significant and unavoidable.**

### b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The proposed General Plan Update Area is largely developed with existing uses. Under the proposed General Plan Update, the City would adopt a new land use plan that revises designations and uses of land citywide. While the proposed Land Use Plan would allow redevelopment of existing uses, the intent of this plan is to provide more opportunities for housing and non-residential development in underutilized areas. The proposed Land Use Plan is intended to guide future development in a way that protects existing residential neighborhoods, economically successful commercial and industrial districts, and parks and open spaces while revitalizing currently underutilized land and offering opportunities for enhancement in areas where business prosperity, job opportunities, and civic activity can be strengthened. The City's 6th Cycle Housing Element, which was adopted ahead of General Plan Update in 2024 and remains a part of the City's General Plan, also prioritizes the preservation of existing housing stock and affordability of new housing in the City and provides specific programs to ensure the implementation of these priorities. As shown in Table 3.14-12, *Displacement: Proposed General Plan Update Policies,* the proposed General Plan Update includes policies that prioritize the protection of existing housing stock. While the 6th Cycle Housing Element is already adopted, its policies that are relevant to this impact are included in Table 3.14-12.

**Table 3.14-12 Displacement: Proposed General Plan Update Policies**

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| **LU-4.2** | **Property maintenance and improvement**. Encourage the upgrade of deteriorated housing, neighborhoods, business corridors, and employment centers; target public/private investment in areas exhibiting blight and disrepair to improve physical and economic conditions. |
| **LU-8.4** | **Focused development**. Focus growth and development in downtown, along commercial corridors, in commercial and mixed-use centers, adjoining transit corridors/ stations and near major community anchors such as Orange Show/ stadium and California State University. |
| **Housing Element** | |
| HE-3.1 | **Housing Rehabilitation.** Facilitate and support the improvement and rehabilitation of housing (single-family detached, multi-family, and mobile homes) to maintain the property in a decent, safe, and sanitary condition. |
| HE-4.5 | **Preservation of Affordable Housing.** Support the preservation of mobile home parks, publicly subsidized housing, and other sources of affordable housing to reduce potential displacement and enhance housing security for residents. |

Furthermore, as noted in Chapter 2, the land use changes under the proposed General Plan Update would also increase opportunities for housing in the city beyond existing housing capacity, for example, by converting commercial designations to mixed-use and increasing residential density in existing residential areas. The proposed project would accommodate 35,940 new housing units compared to existing conditions, exceeding the RHNA goal by 27,817 new units (total RHNA for the city is 8,123 housing units). The Development Code Update would implement the proposed Land Use Plan and does not involve any changes that would affect displacement in the citywide area. Therefore, while redevelopment of existing uses would occur under the proposed General Plan Update, impacts with respect to substantial displacement of people and housing would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area contains approximately 81 acres of land designated for residential uses and 1,315 housing units under existing conditions. Under the DTSP, all land use districts with exception of the County Center would allow housing development, resulting in a net increase of 14,152 new housing units under buildout of the DTSP. Although implementation of the DTSP would result in redevelopment and potential loss of existing units, the net increase in housing units would be over ten times the amount of existing housing in the area. Additionally, as shown in Table 3.14-2, General Plan Update and Housing Element policies prioritize the preservation

and affordability of existing housing stock in the City, including the DTSP area. Therefore, project buildout would not cause a substantial adverse impact on displacement of housing or residents. Impacts would be **less than significant.**

**Significance without Mitigation:** Less than significant.

## 3.14.4 Cumulative Impact Analysis

The geographic context considered for cumulative impacts to population and housing is the area covered by SCAG in the Southern California region. As discussed above, SCAG develops growth projections for local jurisdictions in its planning area which are used to inform regional transportation and air quality planning decisions. These projections also provide a benchmark for jurisdictions to assess their growth against the considerations of regional planning efforts.

**Would the project have a cumulative effect related to population and housing?**

As discussed above, development under the proposed project would not displace housing in the City. Because the City of San Bernardino has no control over development in other areas in the region, it would not contribute to the displacement of housing on other sites in the region.

The proposed project would encourage development on land already proposed for development, as well as intensification and infill projects rather than the annexation of land for development. The goals and policies of the General Plan Update and DTSP would support the projected growth within the City boundaries; however, the proposed General Plan Update would exceed the growth projections in SCAG's RTP/SCS growth forecasts for population, employment, and housing growth. As noted in Impact Discussion (a), the proposed General Plan Update ensures that growth in the city is not "unplanned." This growth would, however, exceed regional projections for growth in the City resulting in substantial growth. Cumulative impacts could occur if the proposed project, in combination with other cumulative projects, directly or indirectly results in unplanned, substantial growth outside of its planning boundaries. As noted, the City does not control land uses outside of the city limits and SOI and therefore cannot directly cause growth in other jurisdictions. Additionally, both the proposed General Plan Update and DTSP improve the jobs-housing balance in their respective planning areas, indicating that at buildout, residential and non-residential growth would not severely exceed the other, necessitating new development to accommodate workers and residents elsewhere in the region. The proposed Land Use Plan under the proposed General Plan Update would ensure balanced growth in the city, and while the proposed project would not contribute to cumulative growth impacts, it would result in substantial growth within the City.

Therefore, cumulative impacts with respect to population growth and displacement under the proposed project would be considered significant. In absence of feasible mitigation measures, impacts would remain significant and unavoidable.

**Impact POP-2: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in substantial growth within the City.**

**Significance without Mitigation:** Significant and unavoidable. While the proposed project would directly result in growth in other jurisdictions in the region, it would result in substantial growth within the City. No mitigation measures are available to reduce this impact therefore growth impacts remain **significant and unavoidable** at the plan level.

## 3.14.5 References

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# 3.15 PUBLIC SERVICES

This section evaluates the potential impacts to public services (fire, police, and schools), and library services associated with the adoption and implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project". This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential impacts to public services, and libraries, and identifies proposed General Plan Update policies that would minimize potentially significant impacts. Impacts associated with parks and recreation facilities is discussed in Section 3.16, *Recreation*.

## 3.15.1 Regulatory Framework

### STATE

### California Building Code

The State of California provides a minimum standard for building design through Title 24 of the California Code of Regulations. The California Building Code (CBC) is in Part 2 of Title 24. The CBC is updated every three years, and the current 2025 CBC went into effect in January 2026. Commercial and residential buildings are plan-checked by City building officials for compliance with the CBC.

### California Fire Code

The CFC incorporates, by adoption, the International Fire Code of the International Code Council with California amendments. It is part of the building standards codes and is the official fire code for the State and all political subdivisions (24 CCR Part 9). Like the CBC, it is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The 2025 CFC took effect on January 1, 2026. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas

### Senate Bill 50

Senate Bill (SB) 50, passed in 1998, limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. SB 50 provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application applicable level depends on whether State funding is available, whether the school district is eligible for State funding and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of moveable classrooms in use.

SB 50 amended California Government Code Section 65995, which contains limitations on Education Code Section 17620, the statute that authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments. Per California Government Code Section 65995, the payment of development fees authorized by SB 50 is deemed mitigate for the impacts of new development on school facilities.

### Mitigation Fee Act (California Government Code 66000-66008)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development plan on which it is to be levied. The Act came into force on January 1, 1989.

### Mello-Roos Community Facilities Act

The Mello-Roos Community Facilities Act, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through special taxes. This State law empowers local agencies to establish Community Facilities Districts (CFDs) to levy special taxes for facilities such as schools.

## LOCAL

### City of San Bernardino Municipal Code

The City of San Bernardino Municipal Code (SBMC) includes various directives to minimize adverse impacts to public services in San Bernardino. The SBMC is organized by title, chapter, and section, and in some cases, articles. Most provisions related to public services are as follows:

- **Chapter 2.27, Library Board of Trustees,** establishes a Library Board of Trustees consisting of 5 San Bernardino residents. Duties and responsibilities include carrying out duties required by the California Education Code, advocating for the library, knowing the programs and needs of the library, keeping abreast of library standards and trends, supporting library staff, and assisting in establishing financial support and preparation of the annual budget.
- **Chapter 2.38, Police Reserve,** establishes that as long as the City receives aid from the State of California, the City will adhere to the standards for recruitment and training of the State of California's Penal Code.
- **Chapter 3.27, Development Impact Fees,** establishes the provisions of new and expanded facilities and infrastructure to protect and promote health, development fees would be enacted to assure all development within the city pays its fair share of the costs of providing necessary public facilities and infrastructure to accommodate new development.
- **Chapter 2.46, Emergency Organization,** provides for the preparation and carrying out of plans for the protection of persons and property within the City in the event of an emergency, the direction of the emergency organization, and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations and affected private persons.
- **Chapter 15.04, Building Code,** adopts the State Building Code under Title 24, Sections Parts 1 through 6, 8, 9, and 11 of the CCR known and designated as the 2025 California Building Code.
- **Chapter 15.16, Uniform Fire Code,** adopts the 2025 California Fire Code, as amended and set forth in the CCR, Title 24, Part 9, which incorporates and amends the International Fire Code and establishes fire and life safety requirements applicable to development projects.

### City of San Bernardino Crime Free Multi-Housing Program

The City of San Bernardino City Council adopted ordinance no. MC-1351, The City of San Bernardino Crime Free Multi-Housing ordinance. The purpose of the program is to gain commitment of property owners, managers, tenants, and community to maintain properties free of illegal and destructive activity.

## 3.15.2 Existing Conditions

### CITYWIDE AREA

### Fire Protection

The San Bernardino County Fire District (SBCFD) is a community-based, all hazard emergency services provider to 65 incorporated cities, including San Bernardino, and unincorporated communities of San Bernardino County. SBCFD is divided into six divisions that serve the areas in the west valley, east valley, mountains, south desert, north desert, and high desert. The City

of San Bernardino City is part of Division 2, with its headquarters at Station 221, 200 E 3rd Street San Bernardino, CA 92410 (See Figure 3.15-1 *Existing Fire and Police Stations*).

SBCFD responds to hazards that include floods, fires, earthquakes, and train derailments, and specializes in impressive services such as the multiple household hazardous waste programs. The Office of Emergency Services coordinates the provision of emergency services within the county. The Office of the Fire Marshal (OFM) provides emergency preparedness and response to fires and hazardous materials incidents and prevents emergencies through education and enforcement of health and safety laws.

### *Fire Station, Staffing, and Equipment*

SBCFD consists of 48 professionally staffed fire stations and nine paid or volunteer fire stations. Table 3.15-1 and **Error! Reference source not found.** list the personnel and equipment of SBCFD. The service area of the City of San Bernardino is within SBCFD Division 2, of which ten fire stations are located throughout the city. Table 3.15-3 summarizes the staffing and equipment information at each fire station in the City of San Bernardino.

**Table 3.15-1 San Bernardino County Fire District Personnel**

| Personnel | Total |
|---|---|
| Fire Chief | 1 |
| Deputy Chief | 2 |
| Assistant Chief | 7 |
| Fire Marshal | 1 |
| Deputy Fire Marshal | 2 |
| Division Chief | 1 |
| Battalion Chief | 25 |
| Captain | 180 |
| Engineer | 177 |
| Firefighter | 256 |
| Paid-call Firefighter | 31 |
| **SUPPRESSION TOTAL** | **683** |
| Profession Staff | 292 |
| Fire Suppression Aide | 12 |
| Ambulance Operator | 84 |
| **PERSONNEL TOTAL** | **1,071** |

Source: San Bernardino Fire District FY 2019-20 Annual Report

**Table 3.15-2 San Bernardino County Fire Department Equipment**

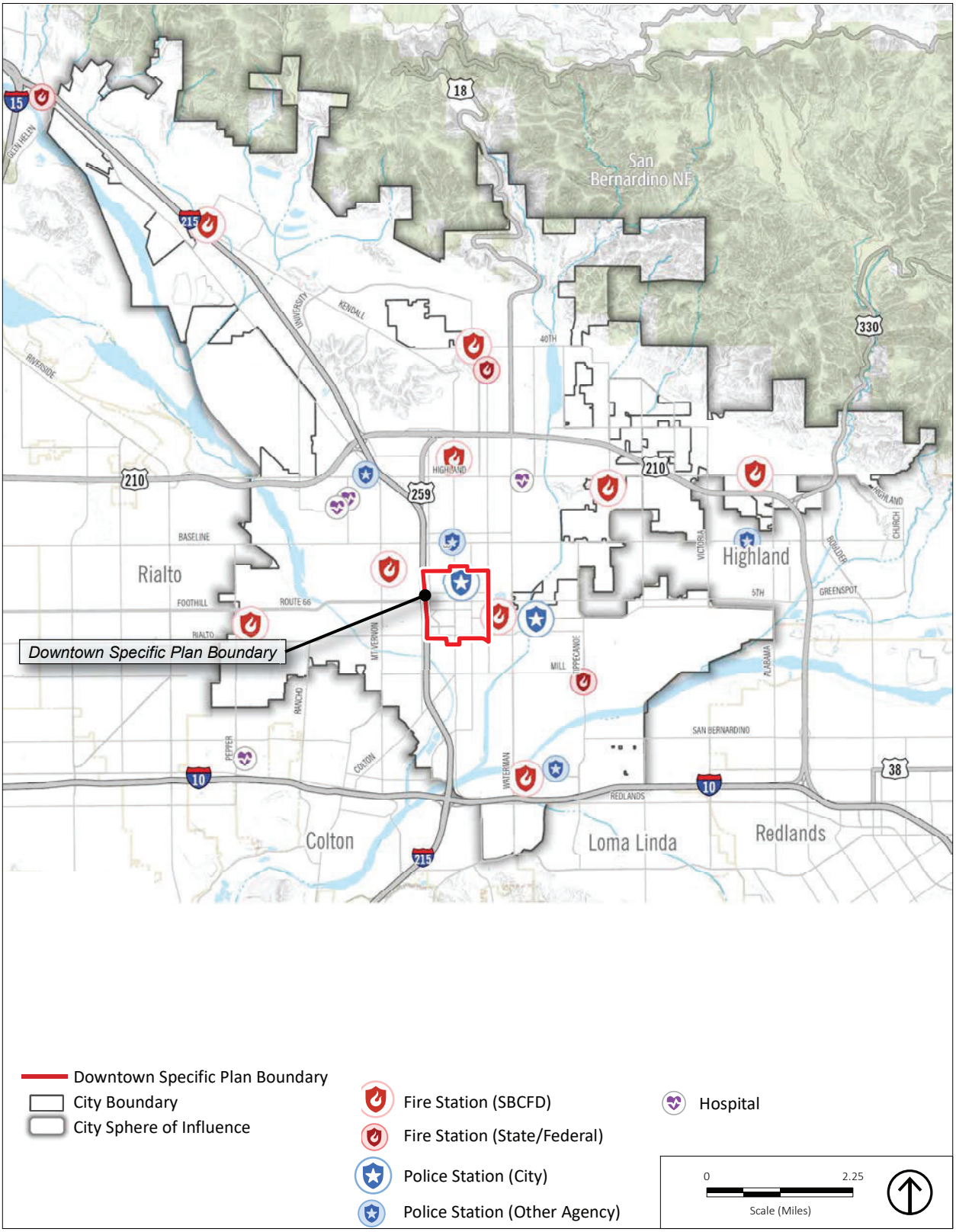
| Equipment | Count |
|---|---|
| Airport Rescue Units | 4 |
| Ambulances | 34 |
| Boats | 5 |
| Brush Engines (Type 3) | 25 |
| Brush Patrols (Type 6) | 28 |
| Command Posts | 6 |
| Communication Support Vehicles | 1 |
| Crew Carriers | 9 |
| Dozers | 2 |
| Fire Engines (Type 1 and Type 2) | 93 |
| Foam Units | 0 |
| Hazardous Material Rigs | 4 |
| Hazardous Material Squads | 8 |
| Ladder Trucks | 6 |
| Loaders | 14 |
| Rescues | 8 |
| Snow Cats | 9 |
| Squads | 15 |
| Tiller Trucks | 7 |
| Water Tenders | 20 |

Source: San Bernardino Fire District FY 2019-20 Annual Report

### Table 3.15-3 City of San Bernardino Fire Stations and Equipment

| Fire Station | Address | Equipment |
|---|---|---|
| San Bernardino Station #221 | 200 E 3rd St<br>San Bernardino, CA 92410 | (2) Paramedic Engines<br>(1) Paramedic Truck<br>(1) Battalion Chief |
| San Bernardino Station #222 | 1201 W 9th St<br>San Bernardino, CA 92411 | Paramedic Engine<br>Paramedic Squad |
| San Bernardino Station #224 | 2641 N. E St<br>San Bernardino, CA 92405 | Paramedic Engine<br>Paramedic Truck<br>Battalion Chief |
| San Bernardino Station #226 | 1920 N Del Rosa Ave<br>San Bernardino, CA 92404 | Paramedic Engine<br>Paramedic Squad<br>Water Tender |
| San Bernardino Station #227 | 282 W 40th St<br>San Bernardino, CA 92407 | Paramedic Engine<br>Brush Engine |
| San Bernardino Station #228 | 3398 E Highland Ave<br>San Bernardino, CA 92346 | Paramedic Engine<br>Brush Engine |
| San Bernardino Station #229 | 202 N Meridian Ave<br>San Bernardino, CA 92410 | Paramedic Engine<br>Brush Patrol |
| San Bernardino Station #231 | 450 E Vanderbilt Way<br>San Bernardino, CA 92408 | Paramedic Engine<br>Brush Engine<br>OES Type I Engine |
| San Bernardino Station #232 | 6065 N Palm Ave<br>San Bernardino, CA 92407 | Paramedic Engine<br>Brush Engine |
| San Bernardino Station #233 | 165 S Leland Norton Way, BLDG. 680<br>San Bernardino, CA 92408 | ARFF units |

Source: SBCFD 2025, Appendix H.




Source: Generated using ArcMap 2025; City of San Bernardino 2025.

Figure 3.15-1
**Existing Fire and Police Stations**

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### *Fire and Medical Incidents*

In FY 2019-20, SBCFD responded to 126,087 calls for service, including 95,879 emergency medical calls, 8,332 fire calls, 251 rescue calls, 1,723 public service calls, 6,351 alarm calls, 3,070 hazardous material calls, 9,549 traffic collision calls, and 932 other calls. Of medical aid calls received in the County during FY 2018-19, 32% are serious life threat, 27% are life threatening, 24% are non-life threatening, 15% are possibly-life threatening, and 2% are imminent life threat. In Division 2, which includes the City of San Bernardino, there were 47,366 calls for services in FY 2019-20, a 2.2% increase from the previous year. Compared to other regions in the county, Division 2 has the highest number of calls for services.

### *Response Times*

In 2020, the average response time reported by the SBCFD for the City of San Bernardino was 6.10 minutes, which is higher than the average response time from the past five years of 5.47 minutes. However, the number of calls for services has doubled in the City, from 21,517 calls in 2016 to 42,855 calls in 2020. Most type of calls were medical, accounting for about half of total calls and an average response time of 5.50 minutes. As of 2025, the average response time is 3.59 minutes (SBCFD 2025).

SBCFD upgraded their technology to improve response capabilities. A new incident management system, Intterra, provides a centralized, visual picture of all agency resources, operations, preplans, reports and analytics in real-time. Innterra is a mobile and immediate cloud-based system that allows County Fire personnel to share data with crews and cooperators during a disaster.

### *Planned Development*

In FY 2021-22 SBCFD assessed all fire stations for a replacement plan as well as new station locations. The plan would help address the current deferred maintenance of approximately $1.5 million in maintenance costs. SBCFD is in the process of replacing two fire stations located in the City of San Bernardino, stations #226 and #227. Both stations are currently located in locations that hinder providing services to the west side of the city. The County plans to relocate both fire stations to help improve response times in the area and save $600,000 in deferred maintenance.

### *Funding Fire Services*

The SBCFD funding sources are derived from fees and services charges, taxes, and fund balance and grants. Grants received help support the programming, training, equipment, or other technical support for the SBCFD. In 2019, the County was awarded funds for supporting the homeland security program, emergency management program, education and outreach, and planning and response equipment. Fire Prevention expenses are shared based on units of

service provided (the number of new construction and tenant improvement permits issued per city, per calendar year). Fire operations and suppression expenses are shared between the partner cities based on the number of firefighters each city requires. To maintain current service levels with contractual and inflationary operation costs, the SBCFD's budget will need to increase over time (SBCFD 2025).

## Police Protection

The City of San Bernardino's Police Department (SBPD) is organized into a District Command system, with a Police Lieutenant responsible for each of five major geographical areas: northern, eastern, western, central, and southern. Police services are provided by the City Police Department within the City limits and the County Sheriff in the unincorporated area. San Bernardino City is served by a main police station located at 710 N. D Street (See Figure 3.15-1 *Existing Fire and Police Stations*). The City Police Department operates under a mutual aid agreement with police agencies in the surrounding cities. This allows use of up to fifty percent of adjacent agency resources upon request and for automatic response within zones of mutual aid.

### *Staffing and Equipment*

The existing General Plan indicates a ratio of 1 officer for every 820 residents. The SBPD currently has a total of 320 officers. The SPBD's goal would be to have 325 sworn officers to accommodate the City's population. Per the SBPD, a more appropriate ratio would be 1 officer for every 785 residents, as this would allow for additional officers to account for population swells that frequently occur in our City. In recent years San Bernardino has become a destination location with a thriving entertainment complex, concert venue and casino (Yaamava), Cal-State San Bernardino, music festivals, trade shows, and off-track betting at the National Orange Show etc., all of which attract tens of thousands of attendees on any given day. The size of the police force should be commensurate to the largest possible population size, not the minimum. (SPBD 2025)

The Police Department also coordinates its volunteer force, comprised of approximately 122 police volunteers. The volunteer personnel assist with case filing in the detective bureau, extra patrols as entered by dispatch, neighborhood ALPR canvasses, traffic control at large events, parking enforcement, and administrative duties at checkpoints at during DUI saturations. Sworn personnel volunteer for the peer support program, honor guard, Police Activities League, and act as Reserve Officer Advisors. The following is a breakdown of the number of police volunteers and their respective duties.

- **11 volunteers:** assist in parking citations, traffic control and minor traffic nuisance issues.
- **10 sworn reserve officers:** patrol the city, respond to calls for service, perform traffic control and assist with traffic operations, such as DUI saturations and checkpoints.

- **65 Community Emergency Response Team (C.E.R.T.) members:** serve as first responders during large scale disasters or law enforcement operations.
- **26 Police Explorers:** youth serve at community engagement events, clean-ups, civic volunteer details and assist during pre-planned police events.
- **10 chaplains** (non-denomination): respond to crisis incidents at the request of citizens and officers.

Currently, all police operations are conducted from or at the main station located at 710 N. D Street. The department is in the process of opening a substation at the Inland Center Mall which will be located at 500 Inland Center Drive Suite 458. When the substation is operational, the majority of equipment will still be maintained at the main station. Existing equipment is as follows:

- 91 marked patrol vehicles
- 78 unmarked detective and administrative vehicles
- 26 undercover vehicles
- 4 forensic trucks/vans
- 1 property/evidence truck
- 12 police motorcycles
- 2 traffic trucks
- 1 traffic equipment trailer
- 2 radar trailers
- 1 message board trailer
- 2 unmarked vans
- 1 jail transport van
- 1 Police Explorer van
- 1 HD tow vehicle
- 2 mobile crash barriers
- 1 Mobile Field Force trailer
- 2 camera trailers
- 1 command post bus
- 1 emergency management bus
- 1 SWAT command post
- 1 armored rescue vehicle
- 1 Polaris UTV
- 14 police bicycles

## *Performance Standards*

In 2020, the Police Department received a total of 102,859 calls for services in the City. The average response time for all calls for service is 101 minutes. Response times from the time the call is entered to the first officer arriving on scene vary by level of priority. The average response time for the highest priority calls, Priority E, is 7 minutes. The average response time for Priority 1 calls is 26 minutes, followed by 108 minutes for Priority Two, 168 minutes for Priority Three, and 198 minutes for Priority Four.

The most common type of call for services in 2020 was silent burglar alarms at commercial spaces, receiving a total of 6,812 calls and 7 percent of all calls. The second most common call for services was unknown problems that required police response, receiving a total of 5,113 calls.

Priority E calls for service (those with an “immediate, life-threatening emergency”) take precedence over all other calls for service. These calls require the immediate dispatch of the closest available unit and often result in officers preempting themselves from lower priority calls to respond. Due to their nature, the on-scene investigations are usually extended and may create call backlogs directly affecting the response times of lower priority calls. The Department's goal is to reduce Priority E response time to 6 minutes or faster, by 2027 (SBPD, 2025).

## *Crime Statistics*

San Bernardino’s violent crime rate is 1,358 per 100,000 people, which is higher compared to the state, 439 per 100,000 people, and the county, 580 per 100,000 people. San Bernardino’s property crime rate is 4,198 per 100,000 people, which is higher compared to the state, 2,126 per 100,000 people and the county, 1,790 per 100,000 people.

The Uniform Crime Reporting (UCR) Act of 1929 was conceived to meet the need for reliable uniform crime statistics across the nation. The City of San Bernardino is mandated by California Government Code to report UCR statistics to the California Department of Justice. The UCR reports indicate that the number of violent crimes decreased 4.0 percent from 2018 to 2020, and that the number of property crimes decreased 32.8 percent from 2018 to 2020.

## *Existing Programs and Services*

SBPD operates ongoing programming and services to increase public awareness about crimes, build relationships between residents and police staff, and maintain the safety of the residents. To enhance communication about its programs and services, SBPD regularly updates social media accounts Facebook, Twitter and Instagram on notable arrests and investigations, public service announcements, traffic updates related to police activity, real time critical incident updates, flyers for community events, and other community announcements. SBPD is also

developing a mobile device application that will improve communication and information sharing with the community.

SBPD hosts regularly scheduled events to continue community engagement. Existing programs and services include:

- **Coffee with a Cop.** These events are monthly casual meetings and designed to encourage open dialogue between police staff and members of the public. District Resource officers attend at least 5 events per year.
- **Neighborhood Pop-Ups.** District personnel host at least 10 impromptu "pop-up" events throughout the city to distribute informational pamphlets and meet members of the community. Pop-Ups are usually outdoors and publicly accessible to encourage community members to meet staff, ask questions, and obtain community information.
- **Traffic Safety.** District personnel educate the public on pedestrian safety and drunk driving awareness by distributing informational pamphlets and answering questions during interactions with the public.
- **Community Participation.** District personnel attend regular community meetings, such as Business Watch meetings or neighborhood association meetings and have standing appointments with City Council members.
- **Police Activities League.** Police staff volunteer to interact with inner-city youth in a relaxed atmosphere and teach life skills such as problem solving, critical thinking, and personal finance.
- **Violence Intervention Program.** The Program aims to reduce homicide and gun related crime by employing outreach workers to build relationships with those most prone to being involved in the violence.

Additionally, the City of San Bernardino implemented a Crime Prevention Through Environmental Design (CPTED) program. It was introduced in 2011, when City Council approved Ordinance MC-1351, which requires all multi-family rental properties with four or more units to follow the Crime Free Multi-Housing rules. The program has three parts: an eight-hour training class, a property inspection to confirm CPTED features are in place, and ongoing upkeep of those CPTED standards. Property owners and managers must also stay involved in the Neighborhood Watch Program. The program is managed by the City's Code Enforcement Division. (SPBD 2025)

### *Improvement Plans*

The SBPD recently created a Real Time Information Center (RTIC) which would help officers serve the community in a safer more efficient manner. Through Fusus, a camera-aggregating system, officers get instant access to cameras, maps, and alerts, giving them accurate information before they arrive on scene. This leads to better decisions, faster responses, and

fewer risks for both officers and the public. The department also added Peregrine, a data-aggregating tool that pulls all internal police databases into one screen, allowing investigators to search quickly and avoid time-consuming manual work. It saves time and provides clearer intelligence to help solve cases and keep the community safe. In addition, a downtown camera grid is being installed to give RTIC staff and dispatchers a bird's-eye view of businesses, streets, and intersections, helping them spot suspects and identify potential criminal activity without sending an officer. The Drone as a First Responder (DFR) program adds another layer of support by allowing a drone to reach a call within minutes, often before patrol units. The drone can show what is happening in real time, helping officers know what they are walking into and reducing unnecessary use of force. It also helps locate missing persons, track suspects, and assess dangerous situations without putting anyone at risk. Finally, the SBPD has partnered with several allied agencies to host a regional intelligence office. The Safety and Tribal Regional Analysis Center (STRAC) will serve as a hub for sharing high-level intelligence. Because major incidents often involve activity that spans multiple jurisdictions, this type of fusion center strengthens our ability to detect threats early and prevent large-scale criminal acts. These tools improve safety, increase transparency, and strengthen trust by making sure we respond quickly and with the best information possible.

### *Funding Police Services*

SBPD's budget was $83,886,461 for FY 2019-20. Subsequent grant funding increased the budget by approximately $12.9 million with grants to Community Oriented Policing, Coronavirus Emergency Supplemental Funding, Alcoholic Beverage Control, Office of Traffic Safety, DOJ Tobacco and Federal Railroad Administration. SBPD is primarily funded through genera funds in the amount of approximately $132 million per year, The department also manages approximately $10 million in grant funding, the majority of which is used to purchase non-budgeted items that have been deemed necessary to provide appropriate policing services. The department also maintains agreements with several outside agencies (the Yaamava tribe, Dignity Health, San Bernardino International Airport, San Bernardino County, etc.) for dedicated police staffing at mutually beneficial locations. These agreements account for approximately $5.7 million in yearly funding. (SBPD 2025)

## Schools

### *San Bernardino City Unified School District*

San Bernardino City Unified School District (SBCUSD) includes 50 elementary schools, 11 middle schools, 10 high schools, and one adult education center. The total student population from K-12$^{th}$ grade for the 2019-20 academic year was 53,037. Of the student population, 20.8 percent are English Language Learners, 12 percent are placed in special education, and 89.4 percent are from socioeconomically disadvantaged backgrounds. Most students are Hispanic, 77.7 percent,

followed by African American, 11.2 percent; White, 4.9 percent; and Asian, 1.3 percent. Locations of existing schools in the city are provided in Figure 3.15-2, *Existing Schools*.

A Dual Immersion program is offered in 17 schools in which students receive instruction and practice in the core curriculum in English and Spanish. Sixteen middle schools and high schools offer Advancement Via Individual Determination (AVID), a program that guides students and teachers through a variety of skills necessary for success in college. The program has met success across the district; 98.9 percent of seniors enrolled in AVID graduated, and 93.4 percent completed entry requirements for admission to 4-year colleges.

The school district budget for the 2019-20 academic year was $712,827,119, spending $12,604 annually per student. SBCUSD employs 7,403 staff members, of which 39 percent are certified staff and 31 percent are classified staff. For the 2018-19 academic year, the District was awarded $24,825,888 in competitive grants and received $744,775 from LCAP Innovation grants. A total of $11,602,759 in scholarships or grants was awarded to 1,330 students. The Making Hope Happen Foundation awarded the District $558,000 in scholarships.

The District's Facilities Capital Improvement Program (FCIP) is responsible for the planning, designing, and constructing of projects at more than 73 campuses. The FCIP is funded by a combination of local bonds, state funds, developer fees and development agreements. Total expenditures to date are approximately $1billion, of which $523 million has gone into the development of new campuses. For the 2019-20 fiscal year, FCIP focused on the planning and development of 50 projects at 69 sites and the 8 projects at 15 sites in bid and award. The most common type of planned improvements at the campuses across the school district include modernization projects and single-point entry projects. There are 33 project sites in the design phase of which nine are modernization projects and six are single-point entry.

## DOWNTOWN AREA

### Fire Protection

In 2016, The city decided to annex its Fire Protection Service to the County Fire Protection District (2024b, 62). SBCFD provides fire protection and emergency medical response services. Specifically, SBCFD East Valley Division 2 provides service coverage to the DTSP and the City of San Bernardino. The East Valley Division 2 contains ten fire stations. Fire station 221 is the closest fire station to the DTSP and is in 200 East 3rd Street, approximately 2.3 miles from the DTSP. Station 221 personnel includes a battalion fire chief, three captains, three engineers, and three firefighter/paramedics (IAFF Local 935 2024). SBCFD responds to hazards that include floods, fires, earthquakes, and train derailments, and specializes in impressive services such as the multiple household hazardous waste programs. The Office of Emergency Services coordinates the provision of emergency services within the county. The Office of the Fire Marshal (OFM) provides emergency preparedness and response to fires and hazardous

materials incidents and prevents emergencies through education and enforcement of health and safety laws.

## Police Protection

The nearest SBPD station is on 710 North D Street, within the boundaries of the DTSP Area. SBPD 257 sworn officers make up the sworn component of the department and 111 civilian support staff members do a variety of service-orientated tasks so that sworn personnel can be a focus on law enforcement-related duties. SBPD includes the Operation, Investigations, and Administrative Division. The Operation Division provides general law enforcement services and is sectioned into five districts: Northern, Southern, Eastern, Western, and Central. The Investigations Division has two bureaus: Detective and Special Enforcement. The Detective Bureau consists of Specialized Crimes, Property Crimes, Case Filing, Forensics Division, Property Division, Robbery, and Homicide. A tenured Sergeant supervises each unit. The Detective Bureau is led by a Police Lieutenant who is responsible for managing the complex investigative workload of this team. The Special Enforcement Bureau consists of the Vice Unit, Narcotics Unit, Gangs Unit, Regional Task Forces, and the Crisis Response Unit. The Special Enforcement Bureau is supervised by tenured Sergeants and managed by a Police Lieutenant. The Administrative division provides all the support services needed to manage a staff of over 400 employees. (City of San Bernardino 2024).

## Schools

The SBCUSD provides educational services for the city including the DTSP. SBCUSD has a total of 73 schools including 50 elementary schools, 11 middle schools, 10 high schools, one virtual school and one adult education center (CSBUSD 2023). The total school enrollment from the 2023-2024 academic year was 49,407. San Bernardino Valley College and California State University, San Bernardino also serve the higher education needs of city residents.




Source: City of San Bernardino 2022.

Figure 3.15-2
**San Bernardino Unified School District**

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### Libraries

The San Bernardino Public Library Department contains four libraries. Table 3.15-4 lists the four libraries and their proximity to the DTSP. Existing Library locations are shown in Figure 3.15-3.

**Table 3.15-4 San Bernardino Public Library Department Libraries**

| Library | Location | Proximity to the DTSP Region | Square Footage (Sq Ft) and Number of Books |
|---|---|---|---|
| Norman F. Feldheym Central Library | 555 West 6th Street | Within the DTSP area | 64,000 Sq Ft<br>119,268 Books |
| Dorothy Inghram Branch Library | 1505 W. Highland Ave | 1.78 miles northwest from the 2-15 freeway | 2,700 Sq Ft<br>11,247 Books |
| Howard M. Rowe Branch Library | 108 E. Marshall Blvd. | 2.46 miles northeast from 8th street | 5,500 Sq Ft<br>25,501 Books |
| Paul Villaseñor Branch Library | 525 N. Mt. Vernon Ave | 0.68 miles west from the 2-15 freeway | 7,500 Sq Ft<br>20, 376 Books |

Source: San Bernardino Public Library 2025, Appendix H.

## 3.15.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning public services. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning public services if it would:

a) 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
- Other public facilities

### METHODOLOGY

Evaluation of impacts related to public services is based on a review of existing policies, documents, and questionnaires filled out by relevant City of San Bernardino staff (see Appendix H). Information obtained from these sources was reviewed and summarized to describe existing conditions and to identify environmental effects based on the standards of significance presented in this section. In determining the level of significance, the analysis assumes that future projects facilitated by the proposed project measures would comply with relevant federal, state, and local laws, ordinances, and regulations.

## 3.15.4 Project Impact Analysis

**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?**

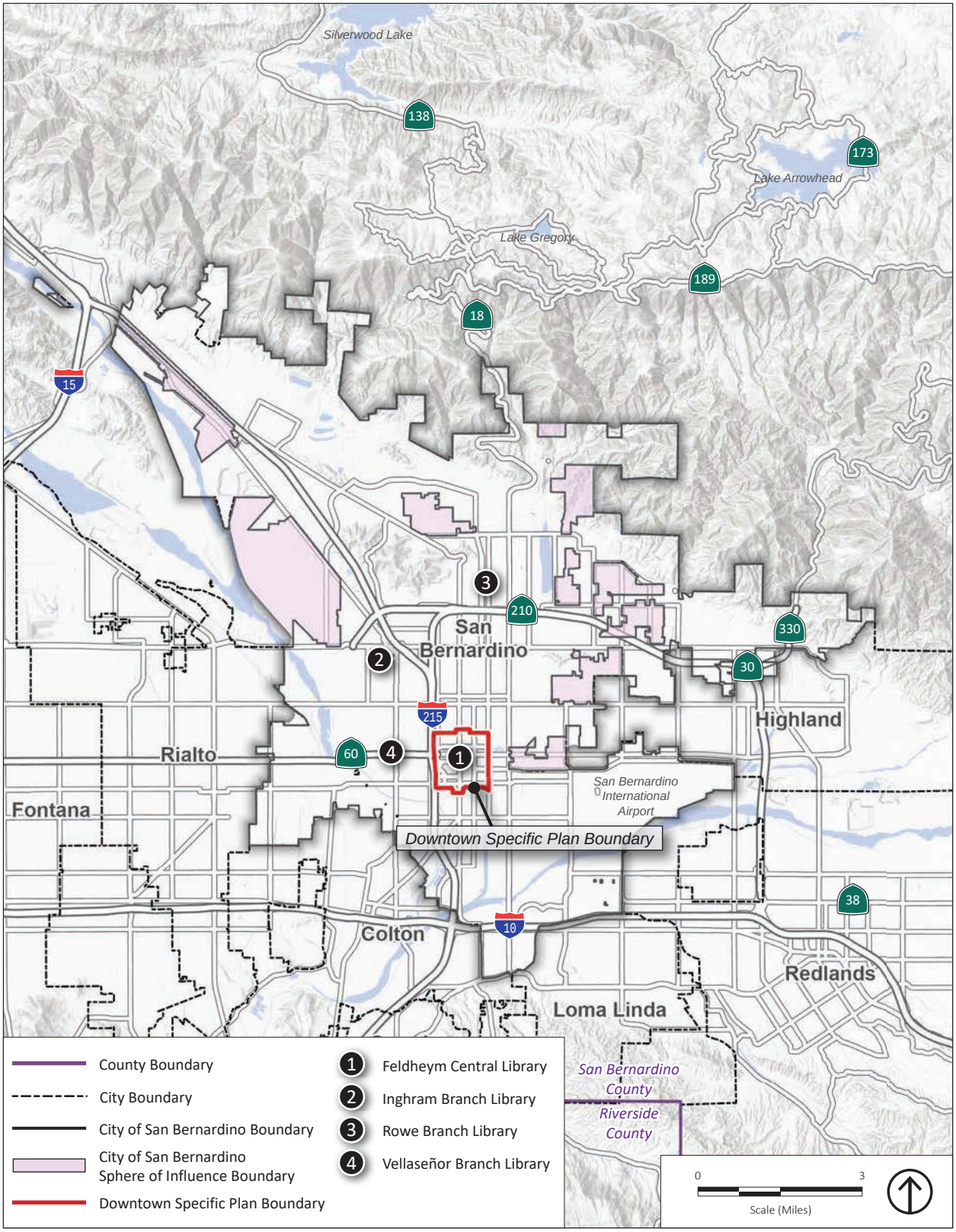
### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

#### Fire Protection

New development in the city would be served by the SBCFD. A significant impact on the SBCFD would result if, for the SBCFD to adequately serve the area, increased demand in the City Limit would require the construction of new facilities or the expansion of existing facilities, the construction or operation of which would cause significant environmental impacts.

Implementation of the General Plan Update would allow for increased development within the General Plan Update Area, which would increase the service population of the SBCFD above existing conditions. Potential future development under the General Plan Update would include new housing and nonresidential development, with associated increases to resident and employee population.

Future development would be required to comply with Title 24 of the CCR, as outlined in Section 3.15.1, *Regulatory Setting*. Compliance with CCR Title 24 would ensure any new development proposed in the General Plan Update Area meets the most current building and fire codes, thereby increasing safety of the buildings, and reducing the likelihood of a fire emergency, subsequently reducing demand on SBCFD fire services.




Source: Generated using GIS Pro 2026.

Figure 3.15-3
**Libraries**

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Additionally, the Public Facilities and Services (PF) Element and Implementation Plan of proposed General Plan Update contain policies that require local planning and development decisions to consider impacts to fire protection services. Table 3.15-5, *Fire Protection: Proposed General Plan Update Policies,* show all the policies that would minimize impacts related to fire protection services.

**Table 3.15-5 Fire Protection: Proposed General Plan Update Policies**

| | |
|---|---|
| **Public Facilities and Services Element** | |
| PFS-3.1* | **Fire Staffing.** Contract with the County Fire District to provide an adequate complement of personnel that are trained to effectively respond to urban fires and emergency medical response throughout the City. |
| PFS-3.2* | **Interagency Cooperation**. Require maintenance of mutual aid, automatic aid, and other multi-agency agreements to ensure that urban fire, wildfire, tactical response, hazmat, and other services are available. |
| PFS-3.3* | **Fire Codes.** Require compliance with the most recent edition of the California Fire Code, County Fire Protection District Fire Code, and public works standards to ensure that buildings, infrastructure, and water supplies and delivery infrastructure meet local fire safety standards. |
| PFS-3.4 | **Fire Station Siting**. Work with the SBCFD to provide, maintain, and retrofit, as needed, fire stations that will enable timely and effective response to emergencies in keeping with city standards and fiscal resources. |
| PFS-3.5 | **Evacuation Routes.** Maintain safe and accessible evacuation routes throughout the city; take precautions and ensure backup or mitigations for routes crossing high hazard areas (e.g., flood, seismic, high fire, etc.). |
| PFS-3.6 | **Fire Safety Prevention.** Support efforts to enhance fire safety throughout San Bernardino by participating in emergency preparedness, community events, community education, and other efforts to promote a fire-safe community. |
| PFS-3.7 | **Community Accountability.** Periodically monitor performance of fire service contracts to ensure that response times are consistent with the District's standards and supplemental standards of the National Fire Protection Association to the extent feasible. |
| **Land Use and Urban Form Element** | |
| LU-13.1 | **Priority Land Uses.** Accommodate a full range of public facilities that include, but are not limited to: schools, government, fire and police facilities, utility, and institutional uses that serve the needs of residents and business in accordance with applicable land use designations, design standards, and development policy. |
| LU-13.3 | **Public facilities**. Ensure that public buildings and facilities are designed and built in a manner that is compatible in scale and character with the areas where they are located; demonstrate excellence in design, aesthetics, and sustainability; and minimize potential impacts such as traffic, noise, and lighting. |

* Denotes mitigating policies

In addition to the proposed General Plan Update policies listed in Table 3.15-5, Section 3.20, *Wildfire*, shows additional policies that would minimize risk of wildfire, thereby potentially reducing demand on SBCFD fire services. Additionally, the City's Local Hazard Mitigation Plan (LHMP) provides a comprehensive assessment of threats that the City faces from natural and human-causes hazard events and a identifies resources and information for local officials to make informed decisions. The Hazard Mitigation Planning Committee, established in the LHMP, is comprised of key City departments and stakeholder members, including representatives from local and regional agencies and companies that are key to hazard mitigation activities.

While the General Plan Update would increase demand on fire protection services as the city grows over time, growth would most likely occur incrementally over the lifetime of the project, and it would be unlikely that the magnitude of increased demands as a result of the full buildout potential of the proposed General Plan Update would be placed on facilities within the immediate timeframe or all at once. Individual project plan review by the SBCFD, implementation of the proposed General Plan Update goals, policies, and action identified, as well as the regulations described under Section 3.15.1 would ensure that the SBCFD is involved as potential future development occurs. Furthermore, future construction of new fire stations would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. Therefore, this impact is **less than significant**.

## Police Protection

New development in the city would be served by the SBPD. A significant impact would result if increased demand in the City Limit would require the construction of new facilities or the expansion of existing facilities in order for the SBPD to adequately serve San Bernardino, the construction or operation of which would cause significant environmental impacts.

Buildout of the General Plan Update is projected to occur over an approximately 20-year horizon. An increase in demand for police protection services would be gradual and is in line with incremental population growth, which would occur with or without adoption of the General Plan Update. Physical expansion of SBPD facilities may be needed to accommodate increases in staffing.

Additionally, the Public Facilities and Services (PF) Element and Implementation Plan of proposed General Plan Update contain policies that require local planning and development decisions to consider impacts to police protection services. See Table 3.15-6, *Police Services: Proposed General Plan Update Policies, that* shows all the policies that would minimize impacts related to police protection services. Furthermore, the General Plan Update would include an Implementation Program that would require the police department to provide regular updates to the Public Safety and Human Relations Commission on safety issues in San Bernardino.

### Table 3.15-6 Police Services: Proposed General Plan Update Policies

| | |
|---|---|
| **Public Facilities and Services Element** | |
| PFS-2.1 | **Police Staffing.** Maintain a complement of personnel in the Police Department that are capable of providing timely response to criminal activity and can equitably protect all citizens and property in the City. |
| PFS-2.2 | **Interagency Cooperation.** Work with the State of California, County, and adjacent cities via inter-agency agreements to secure additional assistance on crime caseload, emergencies, and inter-jurisdictional cases. |
| PFS-2.3 | **Crime Prevention.** Support community-based crime prevention through coordination with neighborhood watch programs, neighborhood organizations, the business community, schools, and other stakeholders. |
| PFS-2.4 | **Police Resources.** Provide City police personnel with sufficient resources, including equipment, technology, and regular training, including cultural awareness training, to effectively perform their job. |
| PFS-2.5 | **Community Policing.** Promote community policing strategies that support community partnerships and problem-solving techniques that build public trust and proactively address public safety issues. |
| PFS-2.6 | **Employee Recruitment.** Recruit a diverse and talented pool of community police candidates who possess the values and skills consistent with those required by the Police Department and community. |
| PFS-2.7 | **Community Accountability.** Regularly work with City officials, the Public Safety and Human Relations Commission, and other entities to keep them abreast of public safety issues in San Bernardino. |
| **Land Use and Urban Form Element** | |
| LU-13.1 | **Priority Land Uses.** Accommodate a full range of public facilities that include, but are not limited to: schools, government, fire and police facilities, utility, and institutional uses that serve the needs of residents and business in accordance with applicable land use designations, design standards, and development policy. |
| LU-13.3 | **Public facilities**. Ensure that public buildings and facilities are designed and built in a manner that is compatible in scale and character with the areas where they are located; demonstrate excellence in design, aesthetics, and sustainability; and minimize potential impacts such as traffic, noise, and lighting. |

While the General Plan Update would increase demand on police protection services as the city grows over time, growth would most likely occur incrementally over the lifetime of the project, and it would be unlikely that the magnitude of increased demands as a result of the full buildout potential of the General Plan Update would be placed on facilities within the immediate timeframe or all at once. Implementation of the proposed General Plan Update goals and policies identified, as well as the regulations described under Section 3.15.1, *Regulatory Framework*, would ensure that the SBPD is involved as potential future development occurs in

the General Plan Update Area. Furthermore, future construction of new police stations would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. Therefore, this impact is **less than significant**.

## Schools

A significant impact would result if, in order for the school districts in SBCUSD to adequately serve residents in the General Plan Update Area, increased school enrollment would require the construction of new facilities or the expansion of existing schools, the construction or operation of which would cause significant environmental impacts.

Increased growth over the buildout horizon of the General Plan Update would cause an increase in the student population over the next approximately 30 years. The student generation factor used by the SBCUSD for new residential development s 0.7 students per dwelling unit for all grade levels. The General Plan Update would result in an increase of 35,940 residential dwelling units. Therefore, based on SBCUSD's established student generation rate, implementation of the General Plan Update would result in approximately 25,158 students. The projected increase in students across the General Plan Update Area would likely be gradual for the duration of the General Plan Update as more housing units are incrementally added to the General Plan Update Area.

Potential future development would incrementally pay for any needed facility upgrades and expansions, which, pursuant to SB 50, has been deemed sufficient to provide full and complete school facilities mitigation for the impacts of the General Plan Update, regardless of whether the fees are adequate to fully fund the expansion or construction of needed facilities. The school districts that serve the General Plan Update Area would continue to collect school facilities fees and enter mitigation agreements with residential developments, as outlined in SBMC Chapter 3.27.

Additionally, the Public Facilities and Services (PF) Element and Implementation Plan of proposed General Plan Update contain policies that require local planning and development decisions to consider impacts to school facilities. Table 3.15-7, *School Facilities: Proposed General Plan Update Policies,* show all the policies that would minimize impacts related to school facilities.

**Table 3.15-7 School Facilities: Proposed General Plan Update Policies**

| | |
|---|---|
| **Public Facilities and Services Element** | |
| PFS-1.1 | **Educational Needs.** Collaborate with the local school districts, California State University, and San Bernardino Valley College to improve facilities and services to meet the educational needs of students. |
| PFS-1.2 | **New Development.** Work with the School Districts to ensure that new residential subdivisions dedicate land or contribute fees for the expansion of school facilities to meet the needs attributable to new development. |
| PFS-1.3 | **Adult Education.** Work with the Unified School District and all local educational agencies, including private schools, to provide continuing adult education courses that meet the needs of residents and business. |
| **Land Use and Urban Form Element** | |
| LU-13.1 | **Priority Land Uses.** Accommodate a full range of public facilities that include, but are not limited to: schools, government, fire and police facilities, utility, and institutional uses that serve the needs of residents and business in accordance with applicable land use designations, design standards, and development policy. |
| LU-13.2 | **Public uses and facilities exempt from City control**. Coordinate, partner with, and encourage school and utility districts, government, and independent agencies that are exempt from City land use control and/or approval to plan and improve their properties to achieve a high level of visual quality and character. |
| LU-13.3 | **Public facilities**. Ensure that public buildings and facilities are designed and built in a manner that is compatible in scale and character with the areas where they are located; demonstrate excellence in design, aesthetics, and sustainability; and minimize potential impacts such as traffic, noise, and lighting. |

In addition to the mandatory payment of fees for new development pursuant to SB 50 and compliance with SBMC regulations, the proposed General Plan Update goals, policies, and action identified also work to minimize impacts to school facilities. Furthermore, any future construction of new schools would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. Therefore, this impact is **less than significant**.

## Library

A significant impact would result if, in order for the San Bernardino public library system to adequately serve the city, increased demand in the General Plan Update Area would require the construction of new facilities or the expansion of existing library facilities, the construction or operation of which would cause significant environmental impacts. New residents would use library services, which could impact library facilities and require the construction of a new library or improvements to existing libraries.

The Public Facilities and Services Element of proposed General Plan Update contains policies that require local planning and development decisions to consider impacts on library services. Table 3.15-8, *Library Facilities: Proposed General Plan Update Policies*, show all the policies that would minimize impacts related to library facilities Additionally, as part of the implementation program, the Library Department would prepare a Library Master Plan that would include a library needs assessment with objectives, fundings, and timeframes.

**Table 3.15-8 Library Facilities: Proposed General Plan Update Policies**

| **Public Facilities and Services Element** | |
|---|---|
| PFS-1.4 | **Library Technology.** Maintain and periodically upgrade facilities with appropriate technology, including hardware and software and information technology support to provide current and secure library services. |
| Pfs-1.5 | **Library Facilities.** Rehabilitate, maintain, and expand existing facilities to meet the needs of residents; consider building new facilities to replace temporary facilities or building facilities in underserved areas. |
| PFS-1.6 | **Library Collections.** Acquire an increasing amount of physical and electronic materials that reflect the educational, recreational, and cultural interests of residents at a level competitive with similar-sized cities. |
| PFS-1.7 | **Library Funding.** Through the City's General Fund, provide increasing funding for library staff to maintain and possibly increase library hours, number of facilities, and activities; examine other potential funding sources. |

It is expected that as the City grows, that the new growth under the General Plan Update would most likely occur incrementally over the next 30 years and not all at once. The potential need for future library facility expansions would be assessed as development occurs. Adherence to the proposed General Plan Update goals and policies would minimize impacts on library services and facilities. Furthermore, future construction of new libraries would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. Therefore, this impact is **less than significant**.

## DOWNTOWN SPECIFIC PLAN

### Fire Protection

Fire vehicles, equipment, service personnel, and expansion of existing facilities are funded by the City's General Fund and revenues from issuing licenses and permits. Funding from property taxes because of population growth would be expected to grow proportional to new residential and non-residential development in the DTSP. Future projects would be required to comply with the adopted Uniform Fire Code and Building Code. For example, Chapter 15.26 of the SBMC

establishes the application requirements and process future development must follow in order obtain its certification of occupancy. The SBMC also adopted the 2025 CFC which details the fire service features needed to comply for all new or changes to existing buildings. Following these Codes will ensure adequate fire protection and prevent unnecessary hazards. General Plan Update Policies PFS-3.1 through PFS-3.7 would increase staffing levels and provide needed equipment, facilities, technology, and training. While the General Plan Update anticipates growth in new residents/works and thus a need for fire services, the growth would occur over a 30-year time span. Because the DTSP is developed and served by the SBCFD, there would not be a substantial increase in demand for fire protection services such that new facilities would be required. Therefore, impacts related to construction of new or physically altered fire protection facilities would be less than significant.

## Police Protection

Funding for additional police facilities, equipment, and officers would come from the City's General Fund. Funding from property taxes, because of population growth, would be expected to grow proportional to any increase in residential or non-residential development proposed in the DTSP. Although the increase in population would result in an increase in service calls, the City and SBPD will need to review future development on an individual basis to ensure safety measures are implemented. For example, complying with the SBMC's Crime-Free Rental Housing Program and Policies PFS-2.1 through PFS-2.7 which would maintain staffing levels and would provide needed equipment, facilities, technology, and training which would result in less than significant impacts. Furthermore, the anticipated growth under the DTSP would not be exponential but rather occur gradually over a 30-year extended period, where police department will not be under sourced. The DTSP is developed and served by the SBPD; therefore, no substantial increase in demand for police protection services such that new facilities would be required. Therefore, impacts related to construction of new or physically altered police protection facilities would be less than significant.

## Schools

The future development in the DTSP is expected to introduce new residents into the area. As future development in the DTSP would introduce growth, the increased demand for additional school facilities will be accommodated through the payment of development fees. Pursuant to California Government Code Section 65995(h), payment of the impact fee fully mitigates impacts on school facilities. General Plan policies such as Policy PFS-1.1 which would require the city to work with local school districts, CSUSB, and SBVC to improve facilities to improve educational needs, as well as Policy PFS-1.2 which would require the city to work with the School Districts to ensure that new residential subdivisions dedicate land or contribute fees for the expansion of school facilities. Although increased demand for school facilities within schools in SBCUSD could result in a potential impact, payment of impact fees in compliance with SB 50 and general plan policies would reduce the impacts to a **less than significant** level.

### Other Public Services

The buildout of the proposed DTSP would occur over a 30-year buildout horizon, resulting in a gradual increase in demand for library services. The San Bernardino Public Library provides electronic and digitized resources that do not require physical library space. Funding for library services comes primarily from the property tax revenue, library fines and fees collected from patrons, and state government aid. As development occurs, property tax revenue would grow proportionally with tax collections. According to SBMC Chapter 3.27.080, impact fees are assessed on new development to help pay for library facilities and resources required to accommodate future demand. Furthermore, the General Plan Update Policies PFS-1.4 through PFS-1.7 would rehabilitate, maintain, and expand existing facilities to meet the needs of residents. The impact is **less than significant**.

### Summary

In summary, it is expected that new growth under the DTSP would most likely occur incrementally over the next 30 years. The potential need for new or physically altered governmental facilities would be assessed as development occurs. Mandatory adherence to the proposed General Plan Update policies. Furthermore, the specific location and design of future public service facilities is not known at this time and cannot be evaluated. Future construction or alteration of public service facilities would be subject to City standards and separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. Therefore, impacts would be **less than significant**.

## 3.15.5 Cumulative Impact Analysis

As described in Chapter 3, *Environmental Analysis*, due to the programmatic nature of the proposed project, Section 3.15.4, *Project Impact Analysis*, presents a cumulative analysis from buildout of the General Plan Update Area throughout the 2050 horizon. The following discussion considers the City's projected growth as it relates to the construction of new or modified governmental facilities to maintain acceptable service ratios, response times, or other performance objectives of the SBCFD, SBPD, SBCUSD, and San Bernardino Public Library System.

**Would the project have a cumulative effect related to public services?**

### Fire Protection

As described in Impact Discussion (a), the SBCFD provides services to the City of San Bernardino as well as mutual aid during State of California and federal incidents. The analysis takes into account growth from potential future development under the proposed project within the City combined with the estimated growth in the service area of the SBCFD. As described under impact discussion (a), construction of additional SBCFD facilities may be needed to meet reflex

time goals and to provide better coverage and service. As the SBCFD requires new equipment or staffing, the funds for such improvements would be provided through the San Bernardino General Fund and development impact fees.

Compliance with State and local regulations described under Section 3.15.1 and the proposed General Plan Update policies identified under Impact Discussion (a), would ensure that fire protection services continue to adequately serve the City. Potential future development that may occur within and adjacent to the City would occur incrementally over the proposed General Plan 2050 buildout horizon, and therefore is not anticipated to substantially increase the population, thereby avoiding reduction of SBCFD's ability to adequately serve residents. Further, because the proposed project is program level, and because potential future development would be required to undergo project review at the time of project application, each potential future development would be assessed for impacts to fire protection services. With adequate planning in place the proposed project would not result in a cumulatively considerable impact on fire protection services and cumulative impacts would be less than significant.

## Police Protection

As described in Impact Discussion (a), the SBPD provides services to the City of San Bernardino. The analysis considers growth from potential future development under the proposed project within the City, which includes the service area of the LPD (e.g., the City Limit). As described under impact discussion (a), construction of additional SBPD facilities may be needed to meet staffing ratios and to provide better coverage and service. As the SBPD requires new equipment or staffing, the funds for such improvements would be provided through the San Bernardino General Fund and development impact fees,

Compliance with State and local regulations described under Section 3.15.1, *Regulatory Framework*, and the proposed General Plan Update goals and policies identified under impact discussion (a), would ensure that police protection services continue to adequately serve the City. Potential future development that may occur within the City would happen incrementally over the General Plan 2050's approximately 30-year buildout horizon, and therefore is not anticipated to substantially increase the population, thereby avoiding reduction of SBPD or in unusual circumstances, if needed, ability to adequately serve the residents of San Bernardino. Further, because the proposed project is program level, and because potential future development would be required to undergo project review at the time of project application, each future development would be assessed for impacts to police services. With adequate planning in place in the city, the proposed project would not result in a cumulatively considerable impact to police services, and cumulative impacts would be less than significant.

## Schools

As described in Impact Discussion (a), the SBCUSD provides public school services to the city of San Bernardino. The analysis takes into account growth from potential future development

under the proposed project within the City, which includes the service area of the SBCUSD (e.g., the City Limit). As described under impact discussion (a), construction of additional school facilities may be needed to meet the needs of the school services in Livermore. As the SBCUSD requires new equipment or staffing, the funds would be provided through the State Local Control Funding Formula, property taxes, federal revenue, other state revenue, and other local revenue. As new development occurs, developer impact fees pursuant to SB 50, which are only be used to finance the construction or modernization of school facilities, would be applied to fund new construction or improvements.

Compliance with State and local regulations described under Section 3.15.1 and the proposed General Plan Update goals and policies identified under impact discussion (a), would ensure that school services continue to adequately serve the City The payment of school impact fees, and standard environmental review procedures for future school improvement projects, the proposed project would not result in a significant impact to schools. Payment of school fees and project-level review of school projects to identify potential environmental impacts and mitigation measures as needed would similarly reduce potential impacts from cumulative development. Therefore, cumulative impacts related to school facilities would be less than significant.

## Library

As described in Impact Discussion (a), the SBPL manages the libraries in the City for the residents of the city of San Bernardino. The analysis takes into account growth from potential future development under the proposed project within the City. As described under impact discussion (a), construction of additional parks will be needed to meet the City's needs. As the SBPL requires new libraries or staffing, the funds for such improvements would be provided through the Livermore General Fund development impact fees.

Compliance with local regulations described under Section 3.15.1 and the proposed General Plan Update goals and policies identified under impact discussion (a), would ensure that the SBPL continue to adequately serve the City. The payment of property taxes and standard environmental review procedures for future libraries and improvement projects, the proposed project would not result in a significant impact to the libraries that serve Livermore. Payment of taxes and project-level review of park projects to identify potential environmental impacts and mitigation measures as needed would similarly reduce potential impacts from cumulative development. Therefore, cumulative impacts related to library facilities would be less than significant.

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# 3.16 RECREATION

This section evaluates the potential impacts to parks and recreational facilities associated with the adoption and implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project". This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential impacts to recreational facilities, and identifies proposed General Plan Update policies that would minimize potentially significant impacts.

## 3.16.1 Regulatory Framework

### STATE

#### California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Park Preservation Act of 1971. Under the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

#### California Landscaping and Lighting Act

The California Landscaping and Lighting Act of 1972 authorizes local legislative bodies to establish benefit related assessment districts, or landscaping and lighting districts, and to levy assessments for the construction, installation, and maintenance of certain public landscaping and lighting improvements. Landscaping and lighting districts may be established to maintain local public parks.

#### Mitigation Fee Act (California Government Code 66000-66008)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development plan on which it is to be levied. The Act came into force on January 1, 1989.

#### Mello-Roos Community Facilities Act

The Mello-Roos Community Facilities Act, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through special

taxes. This State law empowers local agencies to establish Community Facilities Districts (CFDs) to levy special taxes for facilities such as schools.

### Quimby Act

The 1975 Quimby Act (California Government Code Section 66477) authorizes cities and counties to adopt ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for operation and maintenance of park facilities. A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or parkland and the type of development project upon which the fee is imposed. Cities with a high ratio of park space to inhabitants can set a standard of up to 5 acres per 1,000 persons for new development. Cities with a lower ratio can only require the provision of up to 3 acres of park space per 1,000 persons. The calculation of a city's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of City-owned parkland.

## LOCAL

### City of San Bernardino Municipal Code

The City of San Bernardino Municipal Code (SBMC) includes various directives to minimize adverse impacts to public services, parks, and recreation in San Bernardino. The SBMC is organized by title, chapter, and section, and in some cases, articles. Most provisions related to parks and recreation facilities are as follows:

- **Chapter 3.27, Development Impact Fees,** establishes the provisions of new and expanded facilities and infrastructure to protect and promote health, development fees would be enacted to assure all development within the city pays its fair share of the costs of providing necessary public facilities and infrastructure to accommodate new development.
- **Chapter 3.27.70, Quimby Act Parkland and Open Space Acquisition and Park Improvement Impact fee,** provides that the city may impose by ordinance a requirement for the payment of fees to pay for the actual or estimated costs of constructing planned park and open space facilities.
- **Chapter 3.27.075, AB 1600 Parkland and Open Space Acquisition and Park Improvement Impact Fee,** would require that the development of residential and other property in the affected territory will create a need for the construction of park and open space facilities to maintain the current level of service. The park and open space facilities for which payment of a fee and/or dedication of land is required by this section shall be in compliance with the policies, goals and standards contained in the "Parks and Recreation Element" of the general plan.

- **Chapter 3.32, Public Park Development and Recreation Fund,** establishes a fund for the extension and development of public park system and for the construction and reconstruction of facilities for park recreation.
- **Chapter 12.80**, **Public Park and Recreational Facilities**, outlines the provisions pertaining to park and recreational facilities regulations.

## 2026 Parks Master Plan

The City of San Bernardino adopted a new Parks Master Plan on May 6, 2026 to serve as a roadmap for future parks and recreation facilities, focusing on community input and equitable access. The plan aims to ensure an  inclusive community outreach process to identify the community's current needs, identify trends and next practices to move San Bernardino forward, Ensure equitable access to all parks and program offerings citywide, position the Department for future funding and partnership opportunities, and co-create a community vision that is centered on equity.  . The process included community outreach through surveys and meetings to gather input on needs and priorities. The top priority outcomes from this plan based on community input are accessibility, cleanliness, community involvement, programming and resources, and safety. Strategic priorities identified in the plan include guiding the department in enhancing programs, strengthening community connections, and improving facilities. Through these efforts, the department aims to create an inclusive, safe, and vibrant environment that meets the evolving needs of San Bernardino residents.

## Capital Improvements Plan

Improvement of parklands is provided for through the City's CIP. Acquisition funding is limited and must compete with funding needed for ongoing maintenance of existing facilities and equipment as well as with other City needs. In Fiscal Year 2020/2021, approximately $2.76 million of the total was dedicated to park and recreation. This represented approximately 14 percent of the total CIP budget. These funds are primarily provided by Park Development Fees or Community Development Block Grant funds, although Quimby Funds can additionally be used for park acquisition or rehabilitation.

Recommendations for park improvements come from the City's Park, Recreation, and Community Services departments, as well as the City's Public Works department, which maintains park facilities. The 2020/2021 CIP included funding for the following park improvements, which will be completed in coming years:

- Delmann Heights Community Center Upgrades
- 5th Street Senior Center Upgrades
- Perris Hill Senior Center Upgrades - parking and lighting
- Playground Equipment Replacement (Phase 3- Blair Park (2 playground) and Hudson Park)
- Playground Equipment Replacement (Phase 3- Meadowbrook and Anne Shirrel Parks)

- Enchanto Community Center Improvements Phase 1
- Nicholson Neighborhood Park Improvements

## 3.16.2 Existing Conditions

### CITYWIDE AREA

#### Parks

Park facilities are typically classified based on their size, intended use, and service area. Below describes park classifications for parks within the City based on based on common parks and recreation standards.

- **Mini Park:** Mini-parks, pocket parks or play lots are less than 5 acres with a service radius of a quarter mile to half a mile and are easily accessible by walking or bicycling to the surrounding population, Typical amenities include court games, playground apparatus, picnic areas, passive green space, and off-street parking.
- **Neighborhood Park:** Neighborhood parks are 5 to 15 acres with a service radius of half a mule to 1 mile and are easily accessible by walking or bicycling to the surrounding population. Typical amenities include both active and passive designs, court games, playground apparatus, picnic areas, informal field, passive green space, and off-street parking.
- **Community Park:** community parks are approximately 15 to 30 acres in size with a service radius of 1 to 2 miles. Typical amenities include pools, lighted sports fields and courts, picnic facilities, hiking, play areas, restrooms, off-street parking, and service yards.
- **Regional Park:** Regional parks are at least 50 acres in size and offer a wide range of amenities to attract the greatest range of users and interests within and outside of the city. Regional parks provide significant natural features and passive and active recreational features such as sports fields/courts, picnicking, fishing, hiking, and camping.
- **Special Facility:** Includes indoor recreation facilities such as recreation centers, youth centers, and senior centers.

Within the City, there are a total of 39 parks, including 2 Regional Park, 9 Community Parks, 9 Neighborhood Parks, 19 Mini Parks. Some of these parks are located at local schools, which operate under a joint resolution adopted by the Common Council and the school District, which allows schoolyards to remain open during daytime hours afterschool for community use (see Figure 3.16-1, *Parks Facilities,* Figure 3.16-2, *Recreation Facilities*, and Table 3.16-1, *City Parks Inventory*). The City pays rental fees for use of school facilities and the school district has priority access to all of its facilities. There are a total of 4 joint use school facilities within the City.

**Table 3.16-1 City Parks Inventory**

| Park Type | Number of Parks | Parkland Acres |
|---|---|---|
| Mini Park | 19 | 48 |
| Neighborhood Park | 9 | 95 |
| Community Park | 9 | 215 |
| Regional Park | 2 | 103 |
| **Total** | **39** | **461** |

In addition to City facilities, there are large County and Federal open spaces available to City residents with the ability to travel outside of the City limits. The following facilities managed by San Bernardino County are within 50 miles of the City:

- Cucamonga-Guasti Regional Park
- Glen Helen Regional Park
- Lake Gregory Regional Park
- Mojave Narrows Regional Park
- Mojave River Forks Regional Park
- Prado Regional Park
- Yucaipa Regional Park

Glen Helen Regional Park is the closest County facility to the City, located just outside of northwestern city boundary. The Regional Park includes two lakes for fishing; a swim complex with a pool, water slide, and splash pad; large group picnic areas; playground equipment, play fields, and a 65,000 seat outdoor amphitheater.

The San Bernardino National Forest forms the northeastern limit of the City. The expansive National Forest offers access to more wildland experience, including hiking and backpacking, camping, off-road vehicle riding, fishing, and target shooting.

Within the City, there are additional private facilities that provide recreational services, including two eighteen-hole golf courses: Shandin Hills Golf Course and Arrowhead Country Club. The Western Regional Little League Headquarters/Complex is located within the City on City-owned property but used exclusively for little league baseball. The San Bernardino Soccer Complex is managed by a private sports group and hosts home matches for the Southern California Sports Club soccer team, as well as youth and adult sports competitions, amateur and professional events, camps and training sessions.

There is one developed park outside of the City limits but within the City's Sphere of Influence within the Muscoy Area. Blake Street Park is an 8.7 neighborhood park located at the northeast

corner of Blake Street and Bronson Street. Additional parks within walking distance to residents just outside of the City limits include Highland Open Space in the City of Highland, Dawson Park in Loma Linda, and Rich Daeur Park, David Park, and Cooley Ranch Park in Colton.

### *Community Facilities and Programs*

There are nine community centers within the City offering a variety of social, cultural, and physical programming for youth, adults, and seniors. The centers also serve as a venue for social service programs from partner agencies, such as the HeartSmart Program, English as a Second Language (ESL) classes, teen pregnancy prevention programs, immunization, health screenings, food distribution, and Headstart.

The City also offers dedicated adults and youth sports programs, as well as aquatic programs at the parks and pools. The City also operates recreational programming at schools during non-school hours.

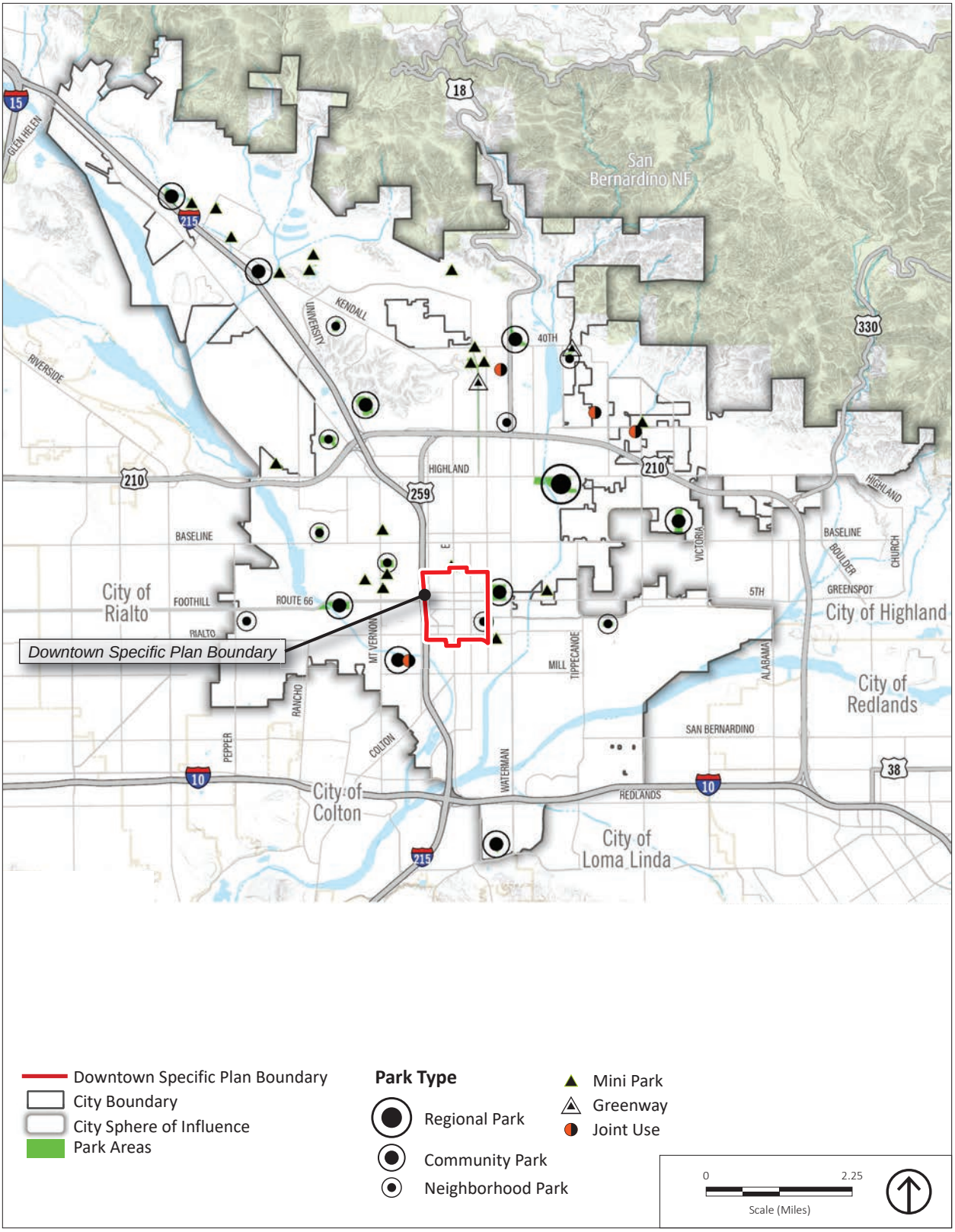
### *Multi-purpose Trails*

Trails and separated pathways provide opportunities for recreation and physical activity. The description of Mobility/Circulation within the City presented in Section 4.1 summarizes Class I bikeways, which function as multi-purpose trails allowing for bicycle and pedestrian travel separated from vehicles.

Currently, the only existing trail is a segment of the Santa Ana River Trail and Parkway, which is a 22-mile trail project developed by San Bernardino County. Only 7.5 miles of the trail are open to the public, including a short segment along the southern boundary of the City. The County proposes to extend the trail to the west expanding trail access for City residents.

### *Park Need*

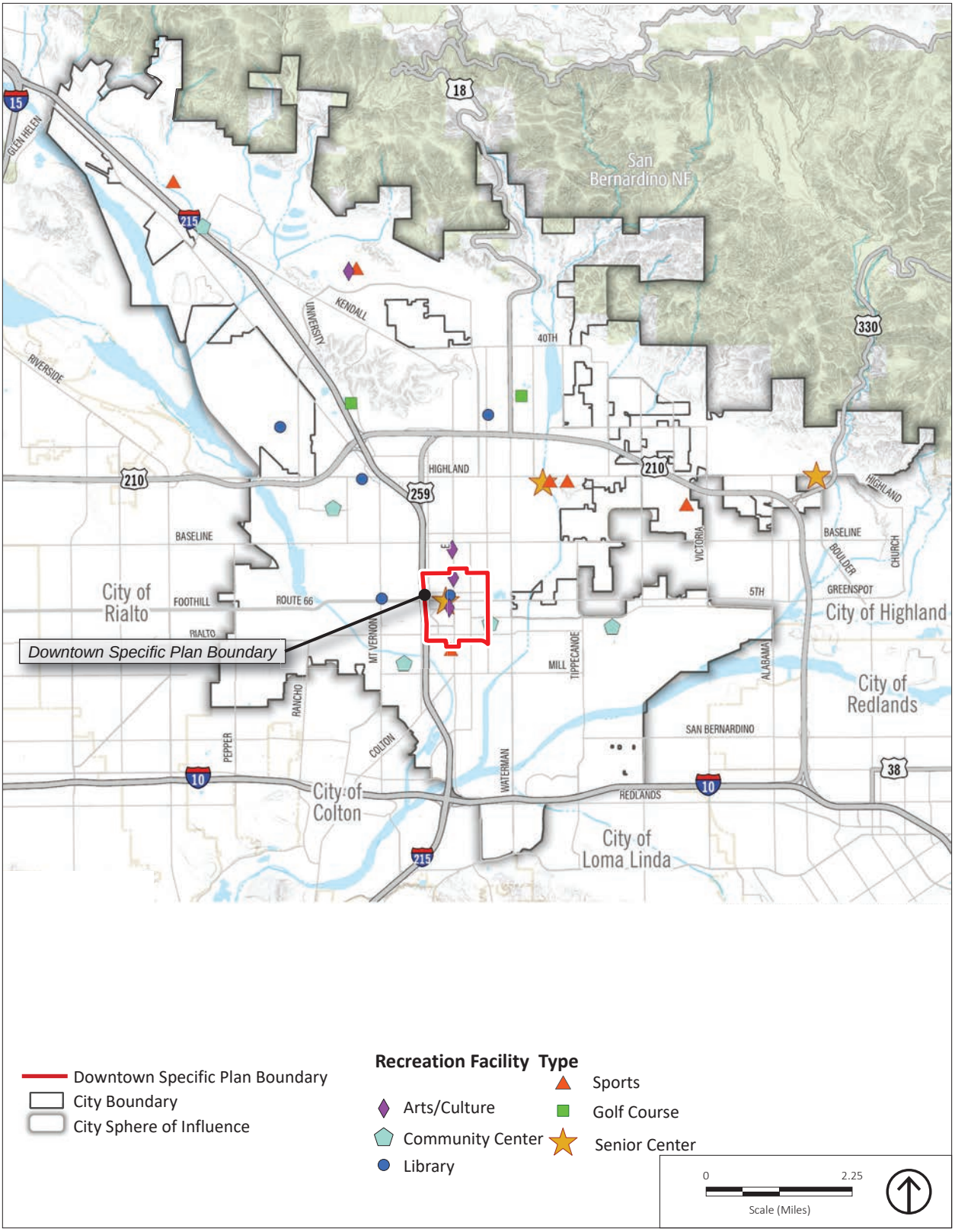
Park need is measured by the acreage of park lands available to residents as well as the percentage of residents who live within walking distance of parks. This section analyzes how well the City is meeting its park need by evaluating the number of acres for each 1,000 residents and the percentage of residents within a 10-minute walk of a park or open space.




Source: Generated using ArcMap 2025; City of San Bernardino 2025.

Figure 3.16-1
**Park Facilities**

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Source: Generated using ArcMap 2025; City of San Bernardino 2025.

Figure 3.16-2
**Recreation Facilities**

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The City of San Bernardino has approximately 620 acres of developed park land maintained by the City. Based on its population in 2019 of 216,000, there are 2.9 acres per 1,000 people. This is currently lower than the City's goal of a park acreage standard of five acres per 1,000 residents. However, the available acreage calculation does not include acreage from the adjacent San Bernardino National Forest or County facilities, which would significantly increase available park land for the City as a whole.

Available acreage is additionally influenced by the anticipated service area of parks based on type. Taking into account City-owned parks, mini parks serve 36.7% of residents while neighborhood parks serve 72.9% of residents. Community parks are distributed throughout the city, servicing about 98.5% of residents. Residents in central and west San Bernardino are more highly served by existing facilities, with residents having access to over 180 acres of parkland, including community parks Seccombe Lake, Pioneer Memorial Cemetery, and San Bernardino Soccer Complex and regional park Perris Hill Park. Residents in neighborhoods on the south side of the Santa Ana River have less available acres and are serviced primarily by parks outside the City. Colony Park is the only City-owned park on the south side of the river. Residents in the northwestern areas are primarily served by Al Guhin and Verdemont Park, with access to Glen Helen Regional Park just outside the City.

For planning purposes, it is ideal for areas with the densest population to have access to the greatest number of park acres. This provides residents with options for park use and prevents existing facilities from becoming overused. Though the area in the north right-adjacent to Cal State University, San Bernardino appears to be park poor, population density is low as that area is a percolation basin. In the southwest corner of the city, the population density is relatively high while access to City-owned parks is relatively low. Residents there are likely served by City-owned community parks with a large service area and the two  parks outside City limits.

## *Park Access*

Park access refers to the proximity and accessibility of parks by residents using multiple modes of transportation, including walking, cycling, and driving. It also considers park access points and physical barriers like streets, railroad tracks, and waterways. The Trust for Public Land and National Recreation and Park Association have established a standard to ensure everyone is within a 10-minute walk of a quality park. This is typically considered to be about a  quarter mile distance. About 17.8% of residents in San Bernardino live within a 10-minute walk of a park. Just under half of the residents, about 45.3%, are within a 20-minute walk or ½ mile of a park.

Being able to access parks and recreational opportunities is a tool in maintaining community health and prevent unhealthy conditions, such as heart disease, asthma, obesity, and diabetes. The National Recreation and Park Association found that a majority (83 percent) of US adults agreed that access to local parks, trails, and open spaces was essential during the COVID-19 pandemic to maintaining their mental and physical well-being. This increased the desire for

access to greenspaces in cities that were already highly valued for their active and passive recreation opportunities. Ensuring access to parks, programs, and services is a key factor in improving individual and community level health, and enhancing quality of life.

### *Funding Parkland Acquisition and Rehabilitation*

Since the passage of the 1975 Quimby Act (California Government Code § 66477), cities and counties in the state have been authorized to pass ordinances requiring that subdividers set aside land, donate conservation easements, or pay in-lieu fees for park improvements. Revenues generated through Quimby Act ordinances can be used for park acquisitions and rehabilitation but cannot be used for the operation and maintenance of park facilities.

The City Municipal Code Chapter 3.27.075 AB 1600 Parkland and Open Space Acquisition and Park Improvement Impact Fee provides for the payment of a fee for each new residential dwelling unit constructed. The fee is placed in a specially designated fund within the Capital Improvements Plan (CIP) and is used for acquisition and development of new or improvement of existing neighborhood and community parks and recreational facilities. The fee which is imposed when a building permit is issued, is based on the type of construction and the percentage of its valuation.

Additionally, SBMC Chapter 3.267.070, provides that in lieu of fees, the Mayor and Common Council may grant credit for land and improvements that are dedicated in fee to public recreation and park purposes. The amount of dedicated land and any conditions are determined by mutual agreement between the City and the dedicator.

### *Operations and Maintenance*

Operations and Maintenance of all City facilities, including parks and recreational buildings, is conducted by the Facilities and Fleet Maintenance Division of the City's Public Works Department. The City does not currently carry out regular facility assessments, although projects in need of large scale improvements are compiled for the CIP list.

## DOWNTOWN AREA

### Parks

The city of San Bernardino is home to thirty-three parks that span approximately five hundred acres of open space and developed land (2022). There are three parks within the DTSP: Pioneer Park, Fifth Street Senior Center, and Meadowbrook Park. Seccombe Lake Park and Rudy C. Hernandez Community Center border the DTSP east of N Sierra Way. Together these parks and recreation resources total approximately 64 acres.

## 3.16.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning recreation. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning parks and recreation if it would:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

c) 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 to maintain acceptable service ratios, response times, or other performance objectives for parks.

### METHODOLOGY

The City of San Bernardino is creating a new Parks Master Plan to serve as a roadmap for future parks and recreation facilities, focusing on community input and equitable access. The plan aims to update the previous 2008 plan and will guide the development of new parks, trails, and recreational opportunities to improve the quality of life for all residents. The process includes community outreach through surveys and meetings to gather input on needs and priorities.

Parks, recreation, and open space resources range from vibrant community and regional parks to natural areas, trails, and open spaces. Active and passive recreation facilities are available at the parks, including but not limited to athletic fields, playgrounds, picnic areas, and multiuse trails for biking. These facilities also offer many sports, special interests, and educational classes. For the purposes of this analysis, parks are identified as either local or regional, which are defined as follows:

- **Local Park.** Local park spaces typically provide facilities for active recreation and gathering that meet neighborhood needs, offer opportunities for daily recreation, and are highly utilized. Local parks have facilities such as picnic areas and playgrounds, and they can accommodate a variety of organized sports, including soccer, baseball, tennis, volleyball, basketball, and skateboarding.

- **Regional Park.** Regional recreation parks are over 100 acres and of regional importance. These facilities contain active amenities such as athletic courts and fields, playgrounds, and swimming pools. They also offer opportunities for wildlife viewing, beautiful scenery, conservation, and outdoor recreation, including hiking, biking, and equestrian trails, that serve residents and visitors throughout the county. Other types of regional facilities besides parks in the Planning Area include trails, trailheads, staging areas, equestrian parks, natural areas, and golf courses.

Additionally, for purposes of this analysis, active and passive recreation facilities are defined as follows:

- **Active.** Active recreation includes organized play areas such as sports facilities for softball, baseball, football, and soccer fields; volleyball, tennis, and basketball courts, swimming pools, and/or forms of playground equipment.

- **Passive.** Passive recreation typically does not require organized play areas or sports facilities and such parks are often irregular in shape. Passive recreation often includes open space areas and trails; it also includes facilities for walking, picnicking, and water sports such as fishing or rowing.

Additionally, school facilities may also provide land and facilities for recreational use on a limited basis through a joint-use agreement between the City and school districts. Public school recreational facilities can be open to the public during non-school hours depending on use agreements, funding, and availability. While schools may provide adjunct recreation opportunities to surrounding neighborhoods during non-school hours, they are also likely to be secured to prevent access. Junior high schools and high schools may also provide adjunct community-wide facilities for public use.

The City uses a goal of 2 to 3 acres of parkland per 1,000 persons for the community, 1 to 2 per 1,000 persons for neighborhood parks, and 0.25 to 0.50 per 1,000 persons for mini parks as established in the Parks, Recreation, and Trails Element of the General Plan, above the Quimby Act standard that requires a minimum of three acres of parkland per 1,000 residents. Pursuant to SBMC Chapter 3.27.070, it is determined that 5 acres of parkland per 1,00 persons be devoted to local parkland for park and recreational purposes. The General Plan 2050 goal is to have 3.0 acres of parks per 1,000 residents, consistent with state law. Local parkland includes mini parks, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails.

This analysis section evaluates the potential impacts of the proposed project's policies on existing parks and recreational facilities within the City of San Bernadino using the State CEQA Guidelines' thresholds of significance. This impact analysis evaluates if the proposed goals and policies would result in significant environmental impacts as a result of use, construction,

expansion, or interference with existing parks, open space, and recreational resources in the project area.

## 3.16.4 Project Impact Analysis

**a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

No state or federal statute details how to calculate the City's level of park service. Additionally, there is no federal minimum level of park or recreation space. Typically, each jurisdiction determines the appropriate park standard based on the guidance provided by Section 666477 of the California Government Code, commonly referred to as the Quimby Act. The City's Park standard, outlined in the Parks, Recreation, and Trails Chapter of the General Plan (San Bernardino 2005, 8-4), is 2 to 3 acres of parkland per 1,000 persons for the community, 1 to 2 per 1,000 persons for neighborhood parks, and 0.25 to 0.50 per 1,00 persons for mini parks. The General Plan 2050 goal is to have 3.0 acres of parks per 1,000 residents, consistent with state law. The California Quimby Act allows cities to charge developer fees to meet the 3-acre standard for their proposed residential projects. At a standard of 3-acres of parks per 1,000 residents, the City should have 675 park acres. The City currently has 461 acres of parkland. Presently, the City has less than 2 acres per 1,000 residents based on an area population of 250,000. This translates into a parkland deficiency of 215 park acres.

The Quimby Act is not designed to address the shortfall of parkland. Addressing the shortfall of parks would require creative efforts to locate, acquire, and purchase new park sites. In lieu of that cost, the City maintains joint use agreements with four schools that allow community use of facilities after school hours. Expanding the number of joint use facilities provides an opportunity for addressing the shortfall of parks, particularly for neighborhood specific needs.

Over the anticipated build-out period, the General Plan Update would result in a net increase of 63,624 residents in units in the city. The addition of new residents to existing would result in a total population of 330,982. Therefore, a total of 993 acres of parkland and recreational facilities would be required to accommodate future residents in the city for the General Plan Update buildout. The City of San Bernardino currently has 461 acres of parkland and recreation facilities. Therefore, the City would need to accommodate an additional 532 acres of parkland for the General Plan Update buildout to meet City standards. Therefore, under this projected population, the City would have a parkland deficiency.

As part of the General Plan Update, 115 acres of open space are proposed under the Land Use Plan. The addition of open space would help offset the parkland deficiency that would occur from projected buildout. However, the City would still have a net deficiency of 417 acres of parkland.

Additionally, the Parks, Recreation, and Trails (PRT) Element and Implementation Plan of proposed General Plan Update contain goals, policies, and actions that require local planning and development decisions to consider impacts to parks and recreation facilities. Table 3.16-2, *Parks and Recreation: Proposed General Plan Update Policies,* show all the policies that would minimize impacts related to park and recreation facilities.

**Table 3.16-2 Park and Recreation: Facilities Proposed General Plan Update Policies**

| **Parks, Recreation, and Trails Element** | |
|---|---|
| PRT-1.1 | **Master plan.** Develop, implement, and regularly update the Parks and Recreation Master Plan to carry out the City's vision, goals and policies for parks and recreation facilities in the community. |
| PRT-1.2 | **Service goal.** Ensure equitable access to parks and recreational amenities by striving to have at least 3 acres of developed parks per 1,000 residents and locating parks in such a manner that all residents can access a park within a 10-minute walk from their residence. |
| PRT-1.3 | **Shared use.** Maintain and expand cooperative arrangements with the local schools, City agencies, and community-based organizations for after-hour and summertime use of parks and recreational facilities. |
| PRT-1.4 | **Multi-agency coordination.** Coordinate with the Forest Service, County and the state for joint use of recreational facilities, parkland acquisition, and the establishment of new recreational programs. |
| PRT-1.5 | **Park prioritization**. Prioritize the development or rehabilitation of parks in neighborhoods with the highest unmet need per the Parks and Recreation Master Plan priority listing and service level goals in the General Plan. |
| PRT-1.6 | **Preventive care and maintenance.** Maintain, care for, and periodically renovate parks and recreation facilities, resources, and amenities to ensure that such facilities are in good condition for continual enjoyment. |
| PRT-1.7 | **Facility evaluation.** Regularly evaluate the adequacy of City park facilities in meeting current and emerging needs; periodically adapt facilities as needed to provide meaningful recreational experiences. |
| PRT-1.8 | **No net loss of parks**. Preserve existing parkland. Ensure that any public parkland proposed for conversion to other nonrecreational uses (like private or public development of infrastructure) is replaced with new, equivalent, or improved parkland, maintaining the total acreage and quality of green space. |

### Table 3.16-2 Park and Recreation: Facilities Proposed General Plan Update Policies

| | |
|---|---|
| **Parks, Recreation, and Trails Element** | |
| PRT-1.9 | **Surplus land**. Identify and prioritize the use of surplus land for parks and recreational purposes, especially parcels which are small and not feasible for housing development; consider surplus sites offered by schools, and local, state, and federal government entities. |
| PRT-1.10 | **Linear park infrastructure.** Identify and support the reuse of linear infrastructure into green connected parks and trails expansion. This includes, among others:<br>▪ flood control channels<br>▪ utility easements<br>▪ greenways along roads or in neighborhoods<br>▪ decommissioned railroad rights-of-ways<br>▪ alleys and discontinued streets |
| PRT-1.11 | **Medians and parkways.** Retain medians, parkways, and all other potential greening opportunities as much as possible within the public right of way to enhance and provide vegetated, shaded active transportation connections to parks, trails and open spaces. |
| PRT-1.12 | **Land recycling.** Support the remediation and safe transition of underused, abandoned, or vacant sites containing hazardous substances that are remediated to transform them into parks and other resilient open spaces that advance public and environmental health. |
| PRT-1.13 | **Parks in new developments.** Encourage and facilitate opportunities for new development to provide usable, well-designed open space for occupants such as courtyards, small plazas, community gardens, terraces, rooftops and other multi-beneficial outdoor spaces. |
| PRT-2.1 | **Community responsiveness.** Collaborate with stakeholders to implement a park master plan for each site that addresses the siting of buildings, open air facilities, and landscape in a unified manner. |
| PRT-2.2 | **Safety and secure design.** Promote the safe design, use, and maintenance of City park facilities by:<br>▪ Designing parks according to CPTED principles.<br>▪ Installing lighting for safe evening use at all parks.<br>▪ Patrolling parks for code compliance. |
| PRT-2.3 | **Multifunctional and flexible design.** Design spaces in parks that can adapt to different, evolving, or simultaneous needs, such as combining active play areas with quiet, passive relaxation spots. |
| PRT-2.4 | **Park use impacts.** Design and manage park and recreational facilities to address and minimize offsite impacts to neighboring residences, including night-time lighting, noise, parking, traffic control, and security. |
| PRT-2.5 | **Sustainable design.** Incorporate sustainability in the design, operation, and maintenance of parks, such as:<br>▪ Native landscaping and use of gray/recycled water.<br>▪ Energy and water conservation features. |

**Table 3.16-2 Park and Recreation: Facilities Proposed General Plan Update Policies**

| Parks, Recreation, and Trails Element | |
|---|---|
| | ▪ Infrastructure that reduces stormwater runoff. |
| PRT-2.6 | **Comfort and shade structures.** Outfit all parks, facilities, and playgrounds with ample tree planting, vegetation, shade structures, water fountains, seating, and other amenities that contribute to longer stays. |
| PRT-2.7 | **Inclusive design.** Design and retrofit parks to facilitate use by residents of all ages and abilities as follows:<br>▪ Meet and exceed ADA accessibility needs.<br>▪ Consider age and gender preferences in designs.<br>▪ Include features that reflect local art and culture. |
| PRT-3.1 | **Community education.** Inform residents of recreational programs, services, and permitted activities at parks through educational campaigns and partnerships with school districts and charter schools. |
| PRT-3.2 | **Programming experiences**. Offer a diverse range of recreational amenities and programs, including heated pools and community classes, and intergenerational and inclusive activities to support the needs of residents. |
| PRT-3.3 | **Community collaboration.** Collaborate with community-based organizations, school districts, businesses, and other community stakeholders to develop and promote recreational programs. |
| PRT-3.4 | **Community events.** Host a range of recurring events and activities at places across the City that bring together the community, celebrate the City's multi-culturalism, and foster community pride. |
| PRT-3.5 | **Age-specific recreation programs.** In coordination with local partners, stakeholders and residents, , facilitate the provision of recreation services, programs, social services, and activities that address the needs of youth, teens, families, adults, and seniors. |
| PRT-3.6 | **City commission.** Continue the role of the Parks, Recreation, and Community Services Commission as the advisory body for recreation and human services programs, services, and activities. |
| PRT-3.7 | **Community centers.** Support City and nonprofit- resource centers as neighborhood hubs that strengthen the cohesiveness of neighborhoods and provide meaningful and enriching activities for residents; direct investments for new facilities in underserved area. |
| PRT-4.1 | **Multi-purpose trail system**. Establish a multipurpose trail system along the foothills of the San Bernardino Mountains, Santa Ana River, Cajon and Lytle Creeks, and interconnecting linkages. |
| PRT-4.2 | **Sidewalk network.** Provide well-designed pedestrian routes that give residents of all abilities the opportunity to walk to and from locations on complete, safe, and pedestrian-friendly sidewalks. |

### Table 3.16-2 Park and Recreation: Facilities Proposed General Plan Update Policies

| | |
|---|---|
| **Parks, Recreation, and Trails Element** | |
| PRT-4.3 | **Regional collaboration.** Work cooperatively with appropriate regional agencies (U.S. Forest Service, County of San Bernardino, and adjacent cities) to facilitate the development of interjurisdictional trails. |
| PRT-4.4 | **Greenbelt system.** Establish a recreational greenbelt system of trails that links the Santa Ana river, washes, and drainage corridors with the mountains and other destinations in the community, as feasible. |
| PRT-4.5 | **Bicycle route planning.** Increase opportunities for walking through a comprehensive master planning process that improves the availability, safety, accessibility, and use of sidewalks. |
| PRT-4.6 | **Development requirements.** Condition approval of new projects near existing or proposed trails to ensure access to trails and/or contribute improvements, dedications, or fees to extend trails. |
| PRT-4.7 | **Environmental protection.** Locate, design, and regulate the use of multipurpose trails so that they do not have a significant negative impact on natural habitat, wildlife, landforms, and cultural resources. |
| PRT-4.8 | **Trail design.** Design trails to accommodate different users, with sustainable materials, trail heads and trail staging areas, trail signage and wayfaring, educational materials, safety sign-ins, and other amenities. |
| PRT-5.1 | **Land acquisition.** Pursue the acquisition of surplus federal, state, and local lands, where feasible, to meet present and future park, recreation, and community service needs |
| PRT-5.2* | **Park funding.** Expand and execute opportunities to fund park and recreation programs with:<br>▪ User fees for all recreation programs and services.<br>▪ Quimby fees and in-lieu requirements for new residential developments per City standards.<br>▪ Gifts of parks, open spaces, and facilities. |
| PRT-5.3 | **Shared community resources.** Collaborate with community organizations, agencies, and other stakeholders to develop opportunities for sharing facilities, programs, and activities. |
| PRT-5.4 | **Facility evaluation.** Evaluate each park and recreational facility for safety and maintenance on an established schedule as a way to identify maintenance, improvement, and repair needs. |
| PRT-5.5 | **Landscape and improvements replacement.** Install new and replace existing deteriorated or inappropriately located landscaping and improvements within parks to ensure parks provide the type of experience desired. |
| PRT-5.6 | **Developer contribution.** Require developers to meet their fair share of park needs by dedicating suitable land, paying a fair share of the costs for new parks and amenities, or renovating existing parks and facilities. |

**Table 3.16-2 Park and Recreation: Facilities Proposed General Plan Update Policies**

| | |
|---|---|
| **Parks, Recreation, and Trails Element** | |
| PRT-5.7* | **Capital Improvement Program.** Install, upgrade, or replace recreational facilities and equipment in accordance with the City's Capital Improvement Program as identified in priority order in the Parks and Recreation Master Plan. |

* Denotes mitigating policies

Implementation of the proposed General Plan Update goals and policies identified, along with regulations described under Section 3.16.1, *Regulatory Setting*, would ensure that impacts related to park and recreation facilities are minimized as future development facilitated by the General Plan Update occurs throughout the city. In addition, as indicated above, new residents, workers, and visitors from potential future development in the city would increase the demand for park facilities, and park service standards would require the construction of new or expanded recreational facilities. Given the existing deficiency of local parkland, future development within the city would not in and of itself result in a significant physical deterioration of recreational facilities. The estimated timing or location of such facilities or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, depending on the type, size, and location of new parks, the construction of new parks would be subject to environmental review and the mitigation as needed to ensure the impacts from the construction would be less than significant. The proposed goals and policies under the General Plan Update would further ensure that specific needs of the communities within the City are met to reduce impacts to park facilities in communities with existing deficiencies. The construction of project-specific parks would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Therefore, this impact is less than significant.

**Significance without Mitigation**: Less than significant.

## DOWNTOWN SPECIFIC PLAN

Over the anticipated build-out period, the DTSP would result in a net increase of 35,618 residents in units in the city. The addition of new residents to existing would result in a total population of 40,912. Therefore, a total of 122.74 acres of parkland and recreational facilities would be required to accommodate future residents in the DTSP. The City DTSP area currently has 64 acres of parkland and recreation facilities. Therefore, the City would need to accommodate an additional 58.74 acres of parkland for the DTSP projected buildout to meet City standards. Therefore, under this projected population, the DTSP would have a parkland deficiency.

As part of the DTSP, open space standards would be implemented to ensure residential projects provide adequate open space. This would be distributed through publicly accessible open space, common open space, or private outdoor space. Property owners, developers and their architects are free to distribute the required open space in combination of these types as project needs warrant, provided the design of the open space types complies with the design standards identified in the DTSP. Table 3.16-3, *Downtown Specific Plan Open Space Requirements*, below, shows the requirements for open space under the DTSP.

**Table 3.16-3 Downtown Specific Plan Open Space Requirements**

| Lot Size (Square-foot) | Non-residential | Residential Projects | Mixed-Use w/ Residential |
|---|---|---|---|
| <10,000 SF | No requirement | 100 SF per unit | 100 SF per unit |
| >10,000 SF | SF equal to 10 percent site area | 100 SF per unit | SF equal to 10 percent site area + 100 SF per unit |

Implementation of DTSP would be subject to the SBMC Chapter 3.27.070, that establishes future development will pay development impact fees and/or dedicate parkland if found to increase park needs. Within the DTSP, Transit Neighborhood can aid in providing park and recreational resources to new residents because this area will include either small pocket parks or plazas within the neighborhood. The City provides park and recreational services on a citywide basis through a system of neighborhood, community, and regional parks that are intended to serve both existing and future residents.

However, with a limited supply of recreational facilities and constrained opportunities for expansion, additional demand generated by the project would likely intensify use of existing parks, potentially accelerating wear and deterioration. Although the project may contribute fees or implement standard mitigation measures, such actions would not fully offset the increased demand or prevent the long-term degradation of these facilities. As a result, the project's contribution on recreational resources would be **potentially significant**.

**Impact REC-1b:** Buildout of the DTSP would exceed the demand for existing recreational facilities in the DTSP area, potentially resulting in deterioration of existing facilities.

**Mitigation Measures:** As noted above, policies in the Parks, Recreation, and Trails Element of the proposed General Plan Update would ensure that parks and recreation facilities are maintained and provided on a Citywide scale to meet future demand. Development in the DTSP area would implement open space requirements as new development is proposed in addition to paying development impact fees for the development of new public facilities. However, within the DTSP area no mitigation measures are available to reduce this impact to less than significant on the programmatic level.

**Significance without Mitigation**: Significant and Unavoidable. Buildout of the DTSP area would increase demand of existing recreational facilities in the DTSP area, potentially accelerating wear and deterioration. While the DTSP would require new development to construct new public and private open space in the DTSP area to meet increased demand and this development would be subject to development impact fees that would offset the cost of developing new facilities Citywide, this demand is anticipated to outpace the available supply of parkland and recreational facilities available in the DTSP area, leading to significant impacts with respect to park and recreation facility deterioration. Therefore, impacts would remain **significant and unavoidable**.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As stated in Impact Discussion (a), one of the many reasons the General Plan Update is being implemented is to ensure adequate recreational facilities are provided to the residents and visitors of San Bernardino. As described in impact discussion (a), it is anticipated that the increase of population in San Bernardino over the 30-year buildout horizon will require the maintenance and expansion of existing parks, as well as the construction of new parks. As previously stated, buildout would occur incrementally throughout the buildout horizon of the General Plan Update. Future development under the General Plan Update would be subject to the proposed General Plan Update goals, policies, and actions identified under impact discussion (a) to ensure that recreation facilities are provided, and that facilities are maintained. The estimated timing or location of such facilities or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, depending on the type, size, and location of new recreational facilities, the construction or expansion of new recreational facilities would be subject to environmental review and the mitigation as needed to ensure the impacts from the construction would be less than significant. Construction or expansion of recreational facilities would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Therefore, the impact is **less than significant**.

**Significance without Mitigation**: Less than significant.

## DOWNTOWN SPECIFIC PLAN

As described above, indirect population growth would be anticipated within the areas proposed for increased residential density associated with the DTSP, which would require construction or

expansion of parks and recreational facilities, which have the potential to result in adverse physical effects on the environment.

As previously stated, buildout would occur incrementally throughout the buildout horizon of the DTSP. Future development under the DTSP would be subject to the proposed General Plan Update goals, policies, and actions identified under impact discussion (a) to ensure that recreation facilities are provided, and that facilities are maintained. Potential physical impacts on the environment related to future parks and recreational facilities projects would be analyzed and mitigated, if required, on a project-by-project basis in compliance with CEQA. State and local regulations would require project-level mitigation for potentially significant impacts to the environment that may result from the construction or expansion of parks and recreational facilities. Therefore, implementation of the DTSP as a programmatic document directing future growth and development within the planning area would not result in the construction or expansion of recreational facilities that may have the potential to result in adverse effects on the environment. Impacts would be **less than significant**.

**Significance without Mitigation**: Less than significant.

**c) 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, to maintain acceptable service ratios, response times, or other performance objectives?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As discussed under threshold (a), implementation of the General Plan Update result in a projected increase of 63,624 residents, bringing the City's total population to approximately 330,982 at buildout. Therefore, a total of 993 acres of parkland and recreational facilities would be required to accommodate future residents in the city for the General Plan Update buildout. The City of San Bernardino currently has 461 acres of parkland and recreation facilities. Therefore, the City would need to accommodate an additional 532 acres of parkland for the General Plan Update buildout to meet City standards. This deficiency indicates that the General Plan Update would create a need for new or physically altered park and recreational facilities to maintain acceptable service levels, response times, and performance objectives. The construction of such facilities could result in environmental impacts associated with land development, grading, vegetation removal, and infrastructure installation. Therefore, the General Plan Update could result in substantial adverse physical impacts related to the provision of governmental facilities, including parks and recreation, unless mitigated through planned park acquisition, development, and implementation of environmental review for individual park projects. However, depending on the type, size, and location of new parks, the construction of

new parks would be subject to environmental review and the mitigation as needed to ensure the impacts from the construction would be less than significant. The proposed goals and policies under the General Plan Update would further ensure that specific needs of the communities within the City are met to reduce impacts to park facilities in communities with existing deficiencies. The construction of project-specific parks would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Therefore, this impact is **less than significant**.

**Significance without Mitigation**: Less than significant.

### DOWNTOWN SPECIFIC PLAN

As discussed under threshold (a), the proposed project would result in increased demand for park and recreational services associated with population growth within the DTSP area. At buildout, the DTSP is anticipated to introduce approximately 35,618 new residents, resulting in a total population of 40,912. Based on applicable service standards, this population would require approximately 122.74 acres of parkland and recreational facilities. However, the DTSP area currently provides only 64 acres, resulting in a deficiency of approximately 58.74 acres. This shortfall would necessitate the provision of new or expanded park and recreational facilities to maintain acceptable service ratios. While implementation of the DTSP would be subject to San Bernardino Municipal Code Chapter 3.27.070, which requires development to pay fees and/or dedicate land to address increased demand, physical constraints and limited land availability within the downtown area restrict the feasibility of developing sufficient new facilities. Although features such as pocket parks and plazas within Transit Neighborhoods would partially offset demand, they would not fully meet the identified need.. However, the construction of project-specific parks would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Therefore, this impact is **less than significant**.

**Significance without Mitigation**: Less than significant.

## 3.16.5 Cumulative Impact Analysis

As described in Chapter 3, *Environmental Analysis*, due to the programmatic nature of the proposed project, Section 3.16.4, *Project Impact Analysis*, presents a cumulative analysis from buildout of the City throughout the 2050 horizon. The following discussion considers the City's projected growth as it relates to the construction of new or modified recreational facilities.

**Would the project have a cumulative effect related to parks and recreation?**

As described in Impact Discussions (a) and (b), buildout under the proposed project would increase demand for local and regional parks in the City and could cause physical deterioration of park and recreational facilities. Parks and recreation services in the City are provided by the City. Future growth in the City would result in increased demand for park and recreational facilities throughout the city and region. As a result, and as described under impact discussions (a) and (b), the City would need to expand and construct additional parks and other recreational facilities to meet the increased demand and maintain existing service levels. Proper implementation of the proposed General Plan Update policies described in Impact Discussion (a) would also help ensure the provision of adequate parklands along with new development. The final location and size of additional facilities would be determined as part of future development activity, and as specific parkland expansion or improvement projects are identified, additional project-specific environmental analysis would be completed. As new development occurs, developers would be required to pay in-lieu fees for the City to dedicate parkland elsewhere pursuant to SBMC Chapter 3.27. This would result in the incremental addition of parkland to ensure the City meets their standard of parkland to residents.

Compliance with local regulations described under Section 3.16.1, and the proposed General Plan Updates goals and policies identified under Impact Discussion (a), would ensure that the City continues to adequately serve the City. The payment of in-lieu fees and property taxes, and standard environmental review procedures for future parks and improvement projects, the proposed project would not result in a significant impact to parks that serve the City. Payment of fees and taxes and project-level review of park projects to identify potential environmental impacts and mitigation measures as needed would similarly reduce potential impacts from cumulative development. As a result, the proposed project would not result in a cumulatively considerable impact on park and recreational facilities and cumulative impacts would be **less than significant**.

**Significance without Mitigation**: Less than significant.

## 3.16.6 References

San Bernardino, City of 2005. City of San Bernardino General Plan Parks, Recreation and Trails Element. https://www.sanbernardino.gov/DocumentCenter/View/957/General-Plan-November-1-2005-PDF

San Bernardino. 2025. San Bernardino Parks and Recreation. https://www.sanbernardino.gov/158/Parks-Recreation

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# 3.17 TRANSPORTATION

This section of the DEIR evaluates the potential transportation-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, referred to together as the "proposed project". Summaries of the relevant regulatory framework and existing conditions are followed by a discussion of the project-specific and cumulative impacts. The analysis in this section is based on the following technical reports:

- *City of San Bernardino General Plan Update Circulation and Mobility Element Transportation Study,* KOA, November 2025 (Appendix I-1).
- *San Bernardino Downtown Specific Plan Transportation Technical Analysis,* KOA, August 2022 (Appendix I-2).
- Vehicle Miles Traveled (VMT) Analysis – San Bernardino Downtown Specific Plan, KOA, August 2022 (Appendix I-3).

Relevant comments regarding transportation were received during the Notice of Preparation (NOP) public review period. The Endangered Habitats League provided comments in a letter dated July 23, 2025, requesting that the proposed project encourage transit-oriented development, walkable design, and housing for multiple income levels. Full comment letters are included in Appendix A. These concerns related to hazardous materials have been addressed in this section of the EIR.

## 3.17.1 Regulatory Framework

### STATE

### Assembly Bill 1358 (California Complete Streets Act)

Assembly Bill (AB) 1358 or the California Complete Streets Act, was signed into law on September 30, 2008. Since January 1, 2011, AB 1358 has required circulation element updates to address the transportation system from a multimodal perspective. The Act states that streets, roads, and highways must "meet the needs of all users in a manner suitable to the rural, suburban, or urban context of the General Plan." The Act requires a circulation element to plan for all modes of transportation where appropriate, including walking, biking, car travel, and transit. In addition, the Act requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled.

The City of San Bernardino adopted the Active Transportation Plan which considers complete street principles within its Active Transportation Network (San Bernardino 2022).

## Assembly Bill 32 (Global Warming Solutions Act)

AB 32 or the Global Warming Solutions Act was signed into law on September 27, 2006. AB 32 established a comprehensive program to reduce greenhouse gas emissions to combat climate change. This Bill requires the California Air Resources Board (CARB) to develop regulations that reduce greenhouse gas emissions to 1990 levels by 2020. On January 1, 2012, the greenhouse gas rules and market mechanisms, adopted by CARB, took effect and became legally enforceable. The reduction goal for 2020 is to reduce greenhouse gas emissions by 25 percent of the current rate in order to meet 1990 levels, and a reduction of 80 percent of current rates by 2050. The AB 32 Scoping Plan contains the main strategies California will use to reduce greenhouse gases. The scoping plan has a range of greenhouse gas reduction actions, which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, and an AB 32 program implementation regulation for funding. In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. CARB recognizes cities as “essential partners” in reducing greenhouse gas emissions. The Air Resources Board has developed a Local Government Toolkit with guidance for GHG reduction strategies such as improving transit, developing bicycle/pedestrian infrastructure, increasing City fleet vehicle efficiency, and other strategies.

The adoption of the City’s Active Transportation Plan is a means for the City to comply with AB 32.

## Senate Bill 375 (Sustainable Communities and Climate Protection Act)

SB 375, or the Sustainable Communities and Climate Protection Act, provides incentives for cities, counties, and developers to bring housing and jobs closer together and to improve public transit. The goal of the legislation is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing GHG emissions set by AB 32.

SB 375 requires each metropolitan planning organization (MPO) to add a broader vision for growth to its transportation plan —– called a sustainable communities strategy (SCS). The SCS must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the area to lower GHG emissions. The SCS should integrate transportation, land use, and housing policies to plan for the achievement of the emissions target for each region. The current Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and SCS were adopted in 2024.

## Senate Bill 743

On September 27, 2013, SB 743 was signed into law. The legislature found that with adoption of the Sustainable Communities and Climate Protection Act of 2008, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that

reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 .

SB 743 started a process that could fundamentally change transportation impact analyses as part of CEQA compliance. These changes will include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts under CEQA. As part of the new CEQA Guidelines, the new criteria "shall promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." The Office of Planning and Research (OPR) developed alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December 2018, and automobile delay, as described solely by level of service (commonly referred to as LOS) or of similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment after July 1, 2020.

### Caltrans VMT-Focused Transportation Impact Study Guide (TISG)

The Caltrans VMT-Focused Transportation Impact Study Guide (TISG) provides a starting point and a consistent basis on which Caltrans evaluates traffic impacts on state highway facilities. The Guide was adopted on May 20, 2020, and provides guidance to Caltrans Districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans review of a land use project or plan's transportation analysis using a VMT metric. This guidance is not binding on public agencies, and it is intended to be a reference and informational document.

## REGIONAL

### Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy is named Connect SoCal in its current version. The plan timeframe is 2024 to 2050 and covers the entire SCAG region in Southern California. This is a long-range vision plan, focusing on future mobility and housing needs along with economics, environmental issues, and public health. The projects defined in the plan include highway improvements, railroad grade separations, bicycle lanes, new transit hubs, and roadway bridges. Goals of the Strategy include preserving open space areas, improving public health and roadway safety, supporting the goods movement industry, and utilizing resources more efficiently.

### County of San Bernardino Countywide Transportation Plan (2015, Interim 2021)

The Countywide Transportation Plan was produced in 2015 by the San Bernardino County Transportation Authority (SBCTA) with the purpose of defining a strategy for investment and management of transportation assets within the County. The Plan's contents include

transportation project funding issues and the growing share of local funding, congestion relief as it relates to economic competitiveness, system preservation and operations, transit connectivity across systems, and air quality and sustainability.

An interim update released in 2021 describes existing transportation assets, current issues facing transportation throughout the County, and goals intended to shape transportation policy and projects moving forward. Examples of components found within this update are a list of long-term transportation and sustainability strategies and a summary of previously enacted funding measures for transportation projects.

## San Bernardino County Long Range Multimodal Transportation Plan (2025)

The San Bernardino County Transportation Authority's (SBCTA) Long Range Multimodal Transportation Plan (LRMTP) was developed to ensure the safe and efficient management, operation, and development of the regional multimodal transportation system. The LRMTP includes a discussion on active transportation with the goals of promoting sustainability, advancing equity, and access. It includes priority active transportation projects such as 9th Street, Baseline Road, and Waterman Avenue bicycle and pedestrian improvements.

## San Bernardino County Transportation Authority Non-Motorized Transportation Plan

SBCTA published its Non-Motorized Transportation Plan (NMTP) in 2011 and revised it in 2018, with the vision of creating a safe, interconnected cycling and walking system in the County. Supplemented by local jurisdiction inventory data, the plan provides both regional and City-level recommendations, and the jurisdictions are responsible for the implementation of the plan.

## San Bernardino County Transportation Authority Development Mitigation Nexus Study

The SBCTA Development Mitigation Nexus Study identifies the fair share contributions from new development for regional transportation improvements (e.g., freeway interchanges, railroad grade separations, and regional arterial highways). The Nexus Study is updated biennially or as requested by the SBCTA Board of Directors and in close coordination with local jurisdictions.

## San Bernardino County Safe Routes to School Plan (2013)

SBCTA's Safe Routes to School Plan seeks to improve roadway safety for students and caregivers in San Bernardino County who use active transportation methods to travel to school. The Plan began in 2013 and progressed in four phases, with the fourth phase currently underway as of 2025. The county-wide Plan is part of a larger national initiative focused on encouraging walking and biking to school through infrastructure improvements, enforcement efforts, and educational programs.

One of the Plan's cornerstone's is partnering with schools, communities, and other agencies to identify suggested routes for children to safely travel to and from school, as well as educational campaigns focused on safe walking, biking and driving. The San Bernardino Unified School District's Safe Routes to School Program was developed in conjunction with the county-wide Plan and provides suggested routes to school for local communities within the City of San Bernardino. An example of a safety-focused campaign employed by the district is "I Drive 25 or Less", which encourages caregivers to drive 25 miles per hour or less in school zones.

## LOCAL

### City of San Bernardino General Plan

The current General Plan's Circulation includes several goals and policies that address transportation in the City.

### City of San Bernardino Active Transportation Plan

The City of San Bernardino's Active Transportation Plan (ATP), adopted in July 2022, recommends bicycle, pedestrian, and accessibility improvements for the purpose of facilitating safe, accessible, and healthy active travel throughout the City. Examples of improvements included in the Plan are high-visibility crosswalks, leading pedestrian intervals, bicycle lanes, curb ramps, and various other types of active transportation infrastructure features. Additionally, the Plan prioritizes specific improvements at key corridors, such as speed feedback signs along Waterman Avenue and new sidewalks along Baseline Street.

A key component of the ATP is the Active Transportation Network (ATN). This proposed network comprises 175 corridors and is intended to facilitate a "complete streets" environment where all roadway users (pedestrian, bicycle, vehicle etc.) can travel safely and effectively. ATN corridors are categorized into three groups: multi-modal corridors providing connectivity to regional destinations, community connectors linking neighborhoods to local destinations such as parks and civic institutions, and school routes designed for children travelling to and from school.

### City of San Bernardino Traffic Impact Analysis Guidelines

Government agencies play a crucial role in the construction and maintenance of public infrastructure facilities, including roadways, rail and bus facilities, and bicycle and pedestrian infrastructure. When private development occurs, it is the government's responsibility to ensure adequate public facilities for population and employment growth. To address this issue, a Traffic Impact Analysis (TIA) is prepared. Previously, TIAs were integrated into the CEQA process, primarily analyzing project impacts. However, with the passage of SB 743, a TIA may now be required as a standalone document for project approval, providing decision-making information not required in the CEQA process. The City's TIA Guidelines provide general instructions for analyzing potential transportation impacts of proposed development projects, with the City

having the discretion to modify requirements based on the project's unique characteristics (San Bernardino 2020).

## City of San Bernardino City-Wide Truck Route Study (2022)

The City of San Bernardino's City-Wide Truck Route Study was commissioned in 2022 to determine the existing pattern of medium-duty and heavy-duty trucks trips throughout the City within the context of existing development plans and community concerns. The primary objective of the study is reducing street damage by preserving pavements conditions and minimizing truck traffic in sensitive areas such as schools and neighborhoods. Key recommendations include the adoption of a designated truck route network which is subsequently enforced by the Police Department through a new City ordinance and identified through the installation of signage for truck routes that clearly identify approved truck routes throughout the City.

On December 10, 2025, the City adopted Resolution No. 2025-393, thereby approving General Plan Amendment 25-03 to amend the Circulation Element to add Citywide Truck Routes pursuant to AB 98.

## City of San Bernardino Local Roadway Safety Plan (2022)

The City of San Bernardino's Local Roadway Safety Plan was created to identify roadway safety needs within the City and recommend infrastructure projects to help address those needs. City-wide crash data retrieved from the years of 2016 to 2020 was analyzed to determine which high-risk corridors and intersections were most in need of safety improvements.

The results of this analysis revealed multiple transportation safety emphasis areas that needed to be addressed, including pedestrian safety, unsafe speeds along corridors and at intersections, and collisions near schools. Plan recommendations include general improvements for multiple locations (including pavement marking upgrades and retroflective back-plate installations), as well as detailed concept plans for specific improvements in high-crash areas. Non-engineering countermeasures such as educational programs and enforcement strategies are also recommended by the Plan.

Examples of top locations identified in the plan as needing improvements include:

- **Segment of Kendall Drive between University Parkway and H Street:** Proposed improvements include Class IV separated bike lanes with parking protection along both sides of the corridor, a new sidewalk on the north side of Kendall Drive, continental crosswalks along the entire corridor at all existing marked crossings, and a signalized intersection at Kendall Drive and Lakewood Drive to provide speed control and increase pedestrian safety.
- **Segment of Baseline Street between Meridian Avenue and Tippecanoe Avenue:** This location was identified as the top roadway segment for collision frequency. The City is

currently conducting a Safe Street and Roads for All Baseline Street Safety Study. Improvements being considered include new traffic signals, pedestrian safety upgrades, and new bike lanes.

- **Segment of E Street between CA-210 and Fairway Drive:** The City received funding from HSIP to address safety improvements from 10th Street to Fairway Drive to install a centerline median.
- **Segment of 9th Street between Waterman Avenue and Del Rosa Drive:** Proposed improvements include reducing one travel lane in each direction and adding Class II bike lanes while retaining the current parking configuration. The countermeasures also include the installation of green bicycle conflict striping at driveways and through intersections and the installation of cross-edge lines where parking is currently prohibited along the corridor. At the intersection of 9th Street & Preston Street, a pedestrian hybrid beacon crosswalk along the west leg along a pedestrian refuge island is recommended.

## Safe Streets For All & Highway Safety Improvement Programs

The Safe Streets For All Program (SS4A) and Highway Safety Improvement Program (HSIP) are federal programs designed to provide funding for roadway infrastructure projects that reduce collisions and improve transportation safety. Both programs focus on the provision of grant funding toward regional and local initiatives that prevent roadway fatalities and serious injuries on the nation's roadways, both in the form of planning and implementation (engineering)-focused grants.

The City of San Bernardino has secured funding from both programs in recent years based on projects identified in the LRSP to improve roadway safety at key locations. The City secured SS4A and HSIP funding for several project that include the E Street that includes the construction of raised medians for the purpose of increasing safety for vehicles and pedestrians, bike lane project on Kendall Drive, Lynwood Drive between 30th Street and Victoria Avenue (substitution of 9th Street segment due to overlap with the Affordable Housing and Sustainable Community Program), and the design and construction of countermeasures at high-risk locations throughout the City (Baseline Street). HSIP funding was also received for two projects that included a dilemma zone upgrade at 49 intersections and signal upgrades to 224 intersections and both projects were completed.

## City of San Bernardino Municipal Code

### *Chapter 10.12 – Traffic-Control Devices*

This chapter regulates the design, erection, and placement of all traffic control devices to be observed by all those who perform work in or near a public street to provide safe and effective work areas, and to warn, control, protect, and expedite vehicle and pedestrian traffic.

### City of San Bernardino Development Code

The Development Code within the Municipal Code of the City of San Bernardino is found in Title 19 of the San Bernardino Municipal Code. This section provides a comprehensive set of regulations governing land use and development within the City, establishing the framework for how properties can be used, developed, and modified to ensure alignment with the City's planning goals and community standards. Key components of the Development Code related to transportation include:

- **Freeway and Transit Overlay Zones.** Provide special design guideline standards within freeway and transit areas. It encourages compact, mixed-use development around transit stations to promote public transit use, support economic growth, and foster high-quality walkable neighborhoods. Key principles include a central transit station with pedestrian-friendly amenities, public and private open spaces, and a connected street and pathway network. This zone applies to areas surrounding transit stations and establishes development standards that override base zoning regulations in the event of a conflict. Areas in the City with transit zones include the Kendall Drive and Palm Avenue Transit Station Area, University Parking and Northpark Boulevard Transit Station Area, and E Street and Rialto Avenue Transit Station Area.

The proposed project includes an update to the City of San Bernardino Development Code.

## 3.17.2 Existing Conditions

### CITYWIDE AREA

### Roadways

San Bernardino has regional access provided by freeways, including the San Bernardino Freeway /Interstate 10 (I-10) at its south side, the San Bernardino/Barstow/Mojave Freeway/Cesar Chavez Memorial Highway/Interstate 215 (I-215) through its center and adjacent to the Downtown area, and the Foothill Freeway/State Route 210 (SR-210) through its northern areas which was recently widened in the cities of San Bernardino and Highland. The overall freeway network accessible from the City provides access to other Inland Empire cities to the east and west, Los Angeles County to the west, San Bernardino and Riverside County cities to the south, and desert cities to the north and east.

State highways within the City include State Route 66 (SR-66) along 5th Street and the west side of the City, State Route 330 (SR-330) providing access from the northeast area to the San Bernardino Mountains, and State Route 18 (SR-18) providing access from the north area via Waterman Avenue to the mountain areas of Big Bear and Lake Arrowhead as well.

### *Roadway Hierarchy*

Local circulation networks that are effective are constituted by a hierarchy of roadways that provide proper regional and local mobility and accessibility. Definitions of roadway facilities and their relative position within the overall network are known as functional classifications.

The following are the descriptions of roadway classifications. These descriptions include highway and local roadway facilities, in order from highest to lowest capacity for vehicle mobility, and also from least accessible to most accessible by all travel modes.

- **Freeway/Highway.** Controlled access that are typically separated roadways that provide for high volumes of vehicular traffic at high speeds. Highways typically provide more frequent access to arterial streets when compared to freeways. They include the following:
  - Interstate 215 (San Bernardino/ Freeway /Barstow/Mojave Freeway/Cesar Chavez Memorial Highway)
  - Interstate 10 (San Bernardino Freeway)
  - State Route 210 (Foothill Freeway)
  - State Route 18

- **Major Arterial.** Roadways with six or eight travel lanes that may also feature raised medians. These facilities carry high traffic volumes and are the primary thoroughfares linking San Bernardino with adjacent cities and the regional highway system. Driveway access to these roadways is typically limited to provide efficient high volume traffic flow. A Major Arterial Street has a typical right-of-way width of 100 feet and a roadway width from curb to curb of 72-80 feet. This type of roadway has a planned capacity to accommodate between 15,000 and 40,000 vehicle trips per day. Roadways include the following:
  - Mount Vernon Avenue
  - Baseline Street
  - Waterman Avenue

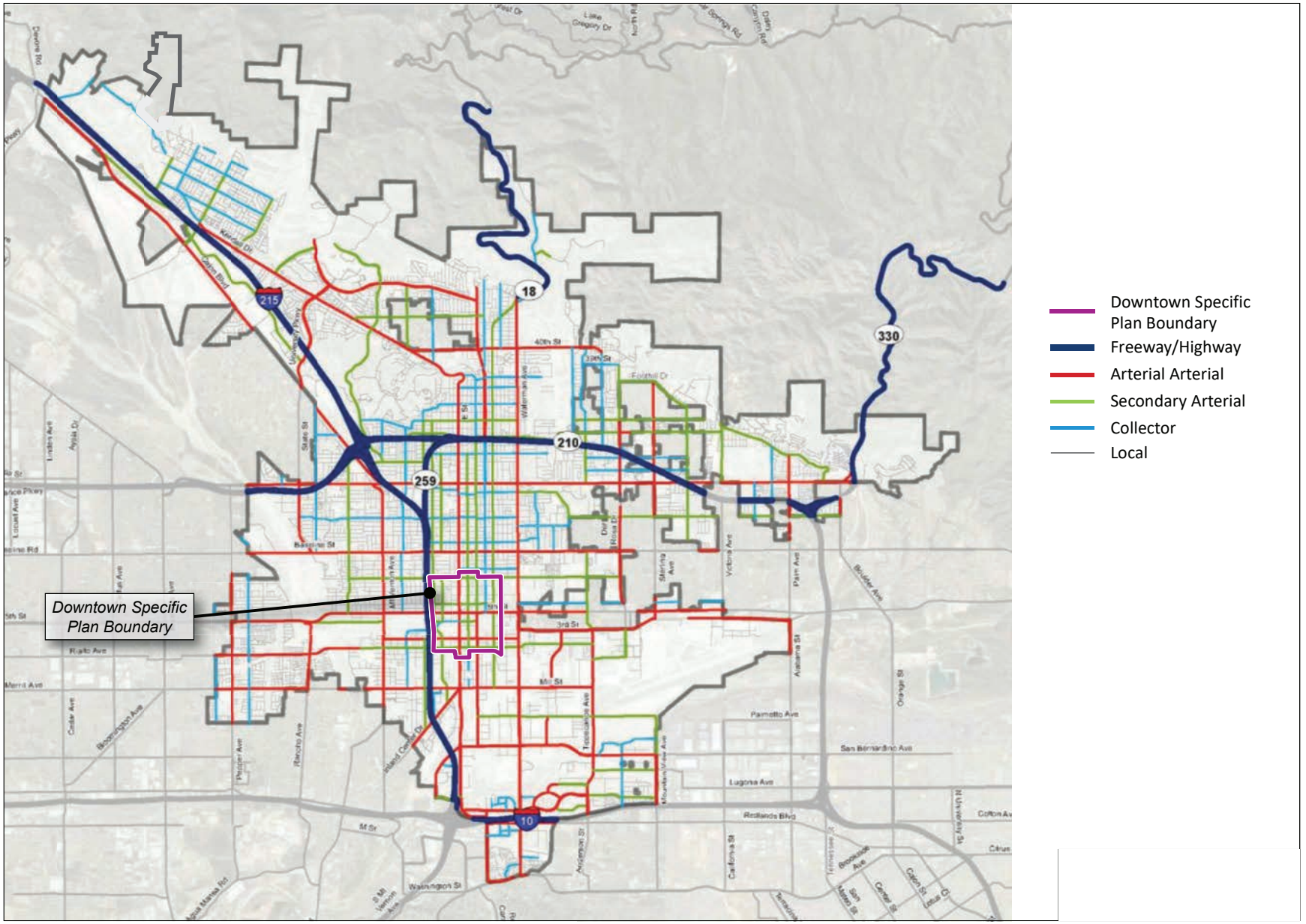
- **Secondary Arterial.** Roadways that typically consist of four-lane streets, with two lanes provided in each direction. These highways carry traffic along the perimeters of major developments, provide support to the major arterials, and are also through streets enabling traffic to travel uninterrupted for longer distances through the City. A Secondary Arterial Street has a typical right-of-way width of 86 feet and a roadway width from curb to curb of 64-66 feet. It has a planned capacity to accommodate between 12,000 and 30,000 vehicle trips per day. Roadways include the following:
  - 4th Street
  - Pacific Street
  - Marshall Boulevard

- **Collector Street.** Two-lane roadways connecting local streets with secondary arterials to allow local traffic to access the regional transportation facilities. A Collector Street is designed with a typical right-of-way width of 60 feet and a roadway width from curb to curb of 40 feet. It has a planned capacity to accommodate between 10,000 and 25,000 vehicle trips per day. Roadways include the following:
  - Caroline Street
  - Belmont Avenue
  - 16th Street
- **Local Street.** Two-lane roadways designed to serve neighborhoods within residential areas. There are several variations on local streets depending on location, length of the street, and type of land use. A Local Street is designed with a typical right-of-way width of 50-60 feet and a roadway width from curb to curb of 36 feet. This roadway type has a planned capacity to accommodate 10,000 vehicle trips per day. Roadways include the following:
  - Court Street
  - 14th Street
  - Lynwood Drive

Figure 3.17-1, *Existing Roadway Classification*, shows the local streets within the City of San Bernardino, which are all roadways that provide direct access to land uses and connect to the regional roadway network through collector and arterial roadways.

## Key Corridors

Several corridors in the City serve as key corridors that function as the primary thoroughfares linking destinations within and outside of San Bernardino. These corridors are typically classified as Major Arterials with limited exceptions. This section describes the most significant key corridors in the City.




Source: KOA, 2025.

Figure 3.17-1
**Existing Roadway Classification**

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### *Mount Vernon Avenue*

Mount Vernon Avenue is a major north-south corridor which runs for approximately four miles within the City. The roadway begins near the I-215 and SR-210 interchange and serves the communities west of I-215, connecting (from north to south) the Community Hospital of San Bernardino, commercial businesses (including restaurants, convenience stores, and auto repair), 5th Street, crosses the BNSF rail yard, and serves San Bernardino Valley College. Along its route, the road has four travel lanes and a two-way left-turn lane. North of 5th Street, the road is co-designated as "Historic Route 66" as the road carried the former U.S. Route 66 prior to its decommissioning. The road is designated as a Major Arterial for its full length. The crossing over the BNSF railyard was recently reconstructed. The original bridge (which opened in 1934) closed in 2020 and the replacement bridge opened in the summer of 2025. The bridge is the only connection that crosses the facility, which spans over 1.5 miles in length.

### *E Street*

E Street is a major north-south corridor which runs for approximately 7.4 miles within the City. The roadway begins at the base of the Shandin Hills, and (from north to south) serves residential and commercial areas, San Bernardino High School, Downtown San Bernardino, San Manuel Stadium, the Inland Center mall, and the Hospitality Lane business district near the I-10 and I-215 interchange. Between 10th Street and Hospitality Lane, the road contains a pair of bus rapid transit lanes separated from automobile traffic, with center-island bus stations, serving sbX BRT service from Omnitrans. At Rialto Avenue, the street serves San Bernardino Downtown Transit Center, with multiple bus routes, Metrolink rail service, and Arrow rail service. E Street typically contains two travel lanes in areas with dedicated bus lanes, and four travel lanes in areas without bus lanes. The road is designated as a Major Arterial for its full length.

### *Waterman Avenue*

Waterman Avenue is a major north-south corridor which runs for approximately 8.5 miles within the City. The roadway begins at the base of Rim of the World Highway near Arrowhead Springs, and serves the Arrowhead Country Club golf course, the St. Bernardine Medical Center and major mountain area destinations, various supermarkets and automobile services, industrial warehouses, the Hospitality Lane business district, and terminates at Barton Road near the Loma Linda Medical Center. State Route 18 runs along Waterman Avenue between its northern terminus and SR-210. Waterman Avenue contains four to six travel lanes. It is classified as a Major Arterial south of Highland Avenue and a Highway north of Highland Avenue.

### *Tippecanoe Avenue*

Tippecanoe Avenue is a north-south corridor which runs discontinuously throughout the City for approximately 3.2 miles. The roadway serves industrial areas in the eastern part of the City, travels near San Bernardino International Airport, crosses the Santa Ana River, connects to Arrow rail service at San Bernardino—Tippecanoe station, and serves the Hospitality Lane business district. Tippecanoe Avenue contains six travel lanes. It is classified as a Major Arterial.

### *Baseline Street*

Baseline Street, which goes by various names including Baseline Road, Base Line Street, or Base Line, is a major east-west corridor which runs for approximately five miles within the City. This road has major regional significance as the full roadway extends 37 miles between the cities of San Dimas and Highland. The roadway serves commercial and residential corridors on the north side of the City, as well as logistics land uses near I-215. It is one of a few connections across the Cajon Wash, a north-south geological/hydrological feature that separates San Bernardino from Rialto near the north parts of both cities. Baseline Street consists of four travel lanes with a two-way left-turn lane along some of its length, and it is classified as a Major Arterial.

### *5th Street*

5th Street is a major east-west corridor that runs for approximately five miles within the City. It is a continuation of Foothill Boulevard, a regionally significant corridor that spans approximately 36 miles from Azusa to San Bernardino, which itself continues westward as Huntington Drive and Colorado Boulevard for approximately 20 miles, through the City of Pasadena, the Eagle Rock community in the City of Los Angeles, and the City of Glendale. Between Pasadena and Mount Vernon Avenue in San Bernardino, this road is co-designated as “Historic Route 66” as the road carried the former U.S. Route 66 prior to its decommissioning. The road serves major destinations including the BNSF intermodal facility and rail yard, Downtown San Bernardino, Seccombe Lake Recreation Area, the San Bernardino County Government Center, and San Bernardino International Airport. The roadway consists of four travel lanes with a two-way left-turn lane along some of its length, and it is classified as a Highway west of I-215 and as a Major Arterial east of I-215.

### *Mill Street*

Mill Street is a major east-west corridor that runs for approximately 4.6 miles within the City in intermittent segments. It is a continuation of Merrill Avenue, which continues westward for approximately 7.8 miles to Fontana via Rialto. The road includes a major crossing of the BNSF intermodal facility, which has a leg that extends 1.2 miles north-south and divides neighborhoods within the City. Mill Street serves San Bernardino Valley College, the Inland Center Mall, the National Orange Show Event Center, various industrial and business uses in the

eastern part of the City, and the San Bernardino International Airport. Mill Street consists of four travel lanes and is classified as a Major Arterial.

### *Kendall Drive*

Kendall Drive is a major corridor that runs northwest-southeast for approximately 4.7 miles in the northern part of the City. The roadway serves the University Heights community, the campus of California State University, San Bernardino, and commercial and residential areas in the Shandin Hills community. Most of this route is served by the sbX BRT line. Kendall Drive contains two to four travel lanes and is classified as a Major Arterial.

## Transit Lines

Transit is operated by multiple transit agencies that include Omnitrans, Metrolink, and other municipal bus operators such as Mountain Transit and Victor Valley Transit Authority. These agencies provide service through a combination of rail and bus services, and when transfer opportunities are considered, these services provide access to regional rail services and numerous other bus routes that connect the City locally and regionally.

All of these transit agencies offer routes that connect either at or near the San Bernardino Downtown Transit Center. This stop is located in the City's Downtown district and acts as a hub for multiple bus lines (including the Omnitrans **express service** sbX Green Line) as well as two Metrolink Lines. These transit routes provide regional service to surrounding cities and communities. The existing area bus and rail transit lines are illustrated in Figure 3.17-2, *Bus and Rail Transit Lines*.

These transit services are described in further detail below.

### *Omnitrans*

Omnitrans is the largest transit service provider within the City with operations throughout San Bernardino County. Omnitrans currently operates local and express bus services, the sbX BRT line, and Access and paratransit service.

There are currently 27 Omnitrans bus routes within the larger service area of western San Bernardino County, and 14 operate within San Bernardino. These routes connect to the City from various points, with the majority of routes connecting to the Downtown Transit Center. Key routes that connect with the center include:

- **sbX Green Line:** Runs north-south primarily along E Street, Kendall Drive, and Hospitality Lane. This route features dedicated bus-only lanes and traffic signal prioritization and runs every 10 minutes during peak weekday hours and every 20 minutes on Saturdays.

- **Route 2:** Runs north-south primarily along D Street, Kendall Drive, and Hospitality Lane. This route runs every 75 minutes, Monday through Sunday.
- **Route 8:** Runs east-west along Mill Street, Rialto Avenue, and Sierra Way. This route runs every 60 minutes Monday through Sunday.
- **Route 10:** Runs east-west along Baseline Street, G Street, and E Street. This route runs every 60 minutes Monday through Sunday.
- **Route 14:** Runs east-west every E Street and 5th Street. This route runs every 15 minutes during weekdays and every 20 minutes during weekends.

Additionally, Omnitrans provides paratransit service (known as OmniAccess) for riders whose physical or cognitive disability prevents them from independently using fixed-route bus service. OmniAccess operates during the same time period as fixed-route service and provides trips within a three-quarters of a mile service area of existing fixed routes.

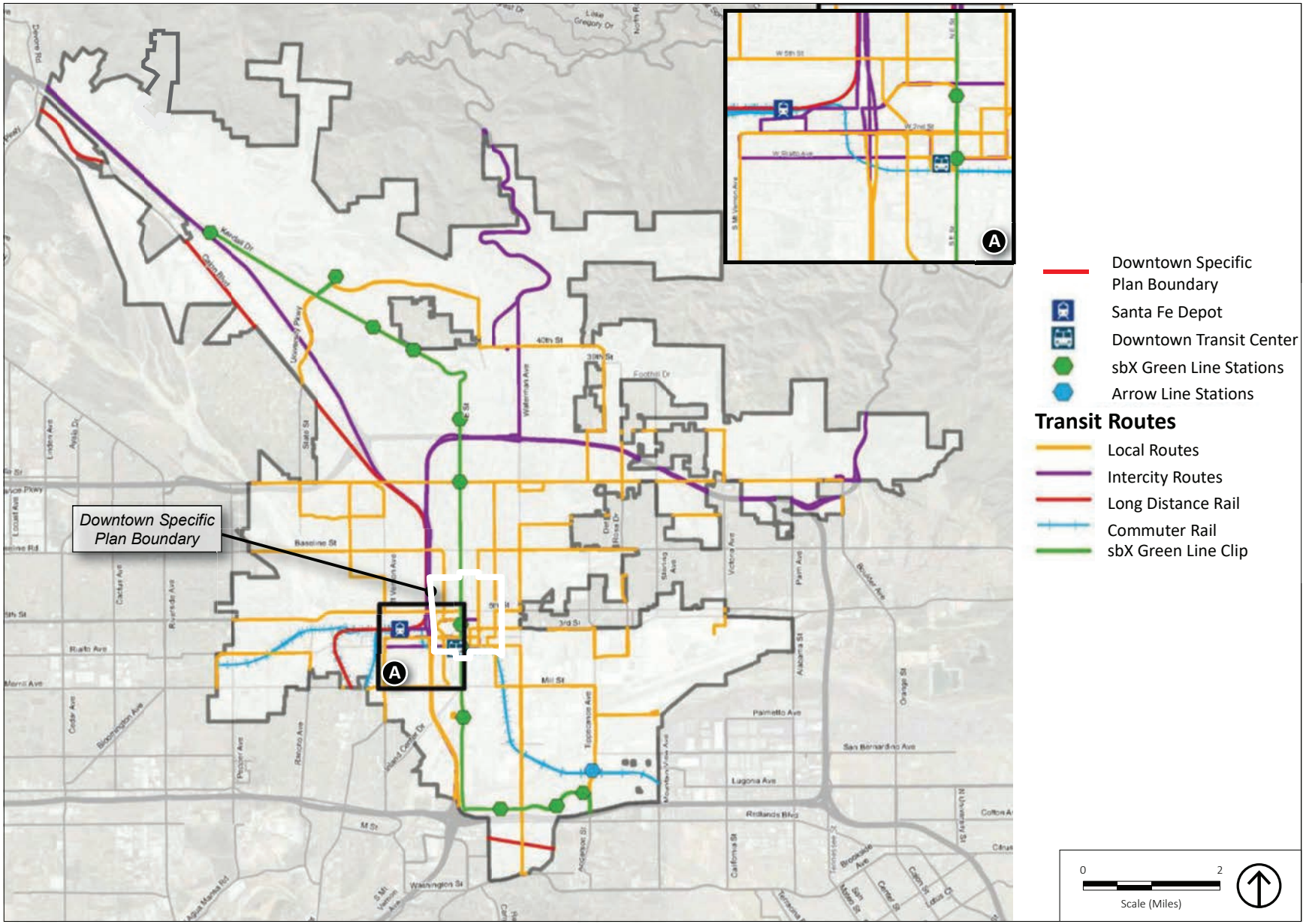
## *Metrolink Commuter Rail*

Metrolink is a rail system providing service in six counties throughout Southern California. The system is headquartered in the City of Los Angeles and consists of eight rail lines, two of which travel through San Bernardino. The following paragraphs describe these rail lines in greater detail.

### ***Commuter Rail***

Metrolink offers commuter rail service at two stations within the City: the San Bernardino-Depot Station, located west of I- 215 adjacent to the BNSF rail yard, and the San Bernardino-Downtown Station, located east of I-215 in the City's downtown district. Trains depart and arrive on weekdays every hour during peak frequency. Service at both stations typically operates during the week from approximately 3:50 AM to 9:12 PM and during the weekend from approximately 7:00 AM to 8:55 PM.

Two commuter rail lines – the Inland Empire-Orange County Line and the San Bernardino Line – service each station. The Inland Empire-Orange County Line originates in Oceanside and terminates at the Downtown Station, while the San Bernardino Line originates at Los Angeles Union Station.




Source: KOA, 2025.

Figure 3.17-2
**Bus and Rail Transit Lines**

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### *Hybrid Light Rail/Commuter Rail – Redlands Arrow Line*

In addition to providing commuter rail service, the San Bernardino Line offers hybrid light rail/commuter rail service starting at the San Bernardino-Downtown Station and continuing eastward to four additional stations: San Bernardino-Tippecanoe located in San Bernardino's North Loma Linda neighborhood, Redlands-ESRI at the corporate headquarters of ESRI Inc., Redlands-Downtown in the City of Redlands' downtown district, and Redlands-University at the University of Redlands campus (the San Bernardino Line's eastern terminus). The Zero-Emission Multiple Unit (ZEMU), the first and only self-powered, zero-emission passenger train in Noth America that operates by hydrogen fuel cells and batteries provides service along this line along with low-emission trains. Service across all five of these stations operates every 30 minutes during peak hours and 60 minutes during non-peak hours, with a weekday service timeframe of approximately 3:40 AM to 11:30 PM and a weekend service timeframe of approximately 5:30 AM to 11:30 PM).

## Other Transit Providers

### *Mountain Transit*

Mountain Transit's service is concentrated in the communities located in the San Bernardino Mountains and includes two routes which connect the communities of Big Bear Lake and Lake Arrowhead, respectively, to Downtown San Bernardino. The Big Bear-San Bernardino Route 5 provides two trips approximately every six hours in both directions on Mondays, Wednesdays, and Fridays. By contrast, the Lake Arrowhead-San Bernardino Route 6 provides four trips approximately every three to five hours in both directions for all weekdays.

### *Victor Valley Transit Authority*

Victor Valley Transit Authority is headquartered in the City of Hesperia provides one route (Route 15) connecting Downtown San Bernardino with the High Desert communities of Barstow and Victorville. This route offers fixed-route service for approximately two to three hours during weekdays, as well as approximately every 90 minutes-four hours on Saturdays and every five to six hours on Sundays.

## Pedestrian Facilities

With more than 5.8 million feet of sidewalks already in place, representing over 73 percent of the total system, San Bernardino provides pedestrian circulation on the vast majority of its streets, supporting both commuting and recreational needs. Moreover, the City is not standing still; it has adopted a forward-looking approach by requiring sidewalk installation in all new land development projects and systematically incorporating missing sidewalks into Capital Improvement Program (CIP) projects. These efforts ensure that curb ramps, crosswalks, and

lighting are added in a coordinated way, steadily closing the sidewalk gap while enhancing accessibility and safety.

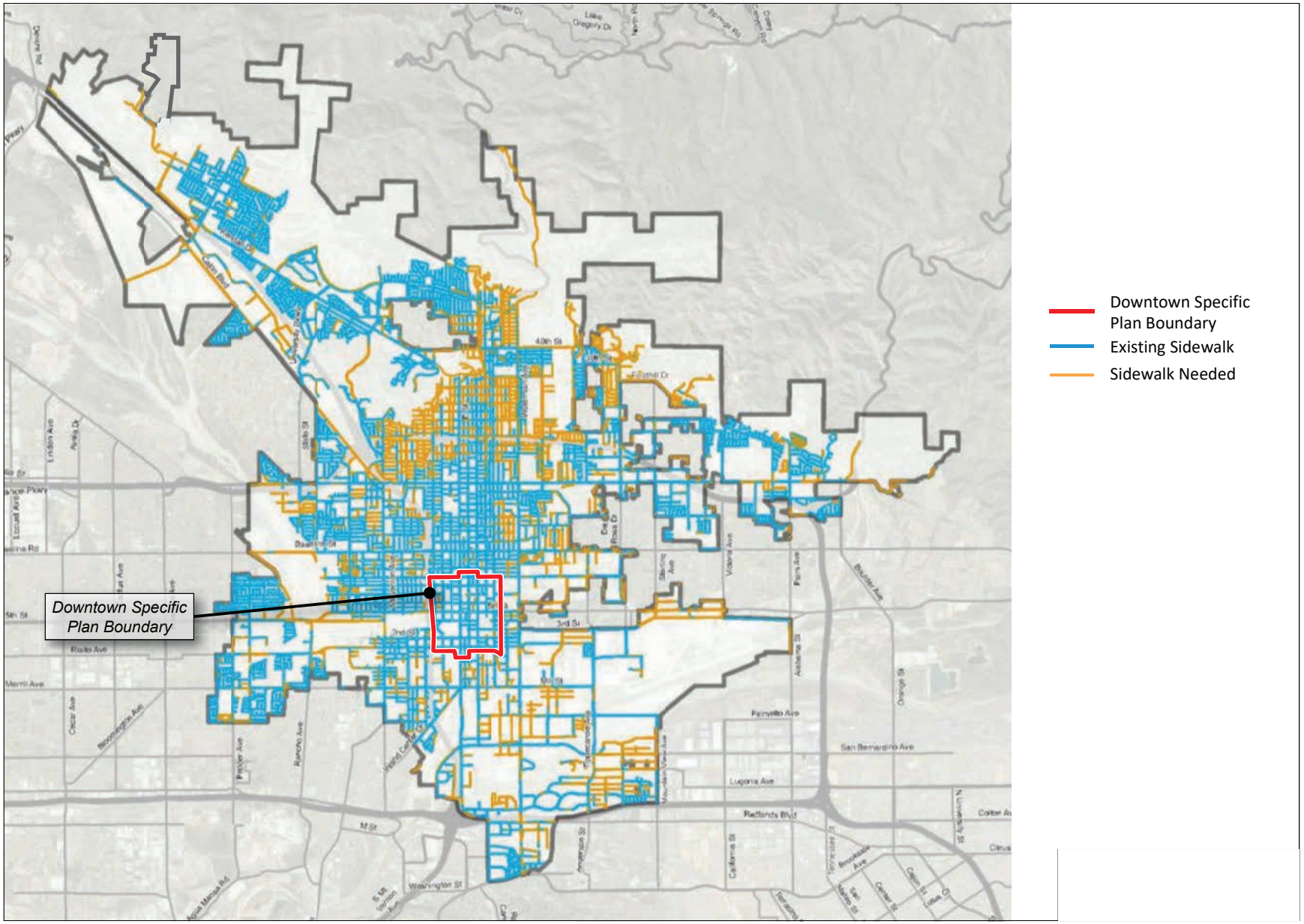
Figure 3.17-3, *Existing Sidewalk Network*, shows the locations of existing sidewalk facilities in the City.

## Bicycle Facilities

Caltrans has developed statewide standards and definitions for the planning, design, and implementation of bicycle facilities. The following is a summation of these standards:

- **Class I (Bicycle Path).** These facilities allow for bicycle and pedestrian travel in both directions with separate rights-of-way from adjacent roadways, or they are completely separated from parallel roadways by major barriers or landscaped areas. Bicycle paths are more often used for recreation and are generally provided along river channels and former railroad rights-of-way. Some bicycle lane facilities denote the lane with both striping and with color-shading within the lane, or color-shading at conflict points such as intersections and driveways.
- **Class II (Bicycle Lanes).** These facilities are provided by a portion of the paved roadway area that is marked as a special lane for use by bicycles only. It is identified by signage along the street that denotes "Bike Lane", pavement markings and lane line markings. Motor vehicles are prohibited from driving in bike lanes except when turning to and from driveways, at intersections, or accessing on-street parking.
- **Class III (Bicycle Route).** These facilities are defined as bikeways within the travel lanes of a roadway right-of-way. The purpose of a bicycle route is to encourage sharing of the roadway between vehicles and bicycles. They are identified by signage along the street that denotes "Bike Route." A bicycle boulevard is an enhanced Class III facility. The purpose of the bicycle boulevard is to more visibly denote the sharing of a roadway through the use of sharrows striping within travel lanes to indicate the shared lane conditions and are typically identified by signage. Some bicycle boulevards denote the lane sharing with a color-shaded lane, or color-shading at conflict points such as intersections and driveways. Traffic calming measures along the corridor and enhanced directional signage are often a part of implementation.
- **Class IV (Separated Bicycle Lane).** These are often called cycle tracks, which are bicycle lanes located between the sidewalk and either on-street parking or a travel lane, and separated by a curb or median or other barrier. These facilities have similar benefits to a bicycle path, and require special treatments at intersections, depending upon the setback from the travel lane and visibility issues.

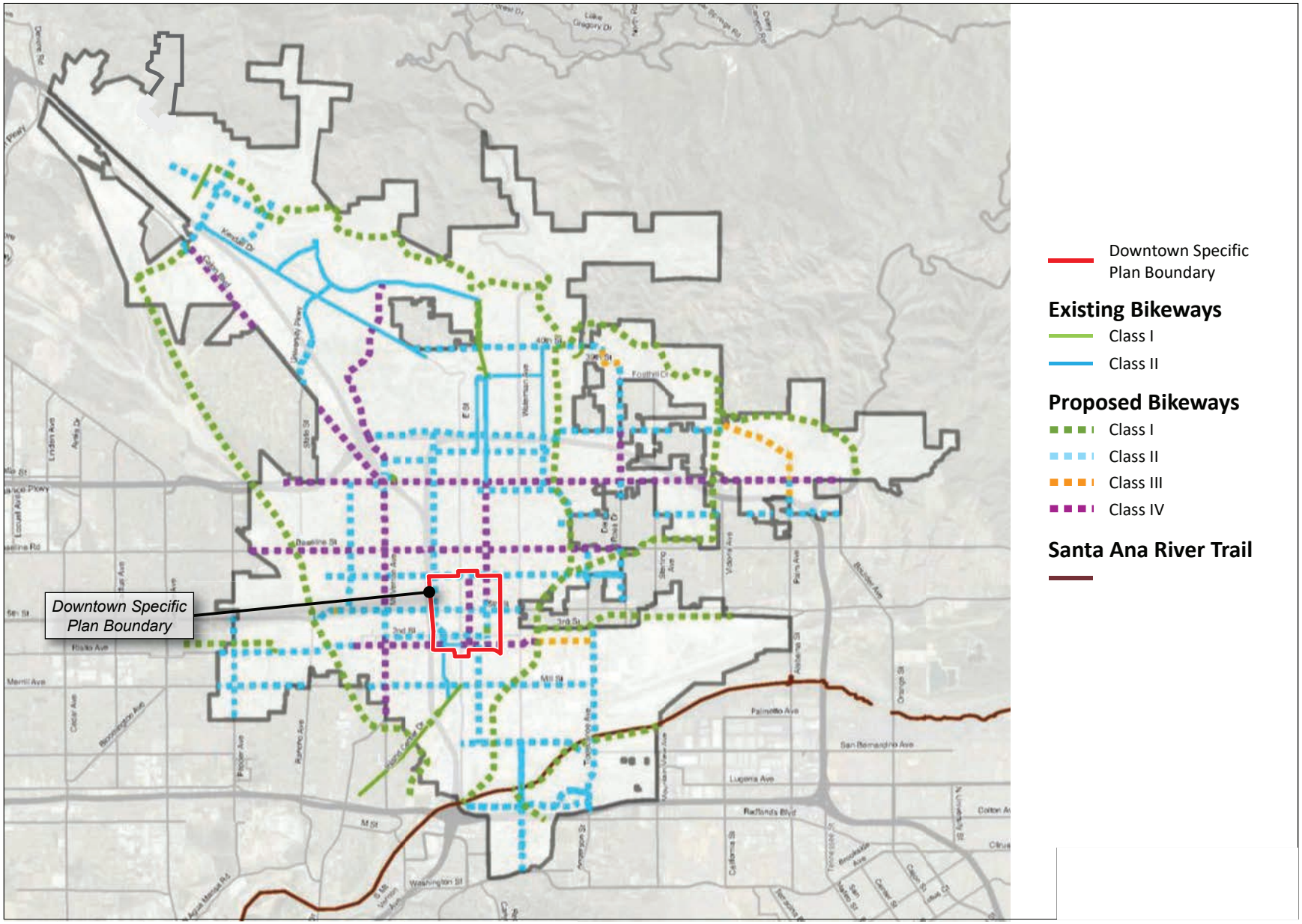
The existing and proposed bicycle network in the City is shown in Figure 3.17-4, *Existing and Proposed Bikeway Facilities*.




Source: KOA, 2025.

Figure 3.17-3
**Existing Sidewalk Network**

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Source: KOA, 2025.

Figure 3.17-4
**Existing and Proposed Bikeway Facilities**

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## DOWNTOWN SPECIFIC PLAN AREA

### Roadways

The DTSP Area features high automotive accessibility along I-215 with direct connections to Riverside, Temecula, and San Diego to the south, and Victorville to the north. The highway also has junctions with SR-210 and I-10 near the Downtown Specific Plan Area, offering connections to Pasadena and the Los Angeles metropolitan area to the west, and Indio to the east. Figure 3.17-1 shows the existing roadway network and classification within the DTSP Area.

### Transit

Regional transit connections are available from the City of San Bernardino to Los Angeles, Orange, Riverside, and San Diego counties, centered on the San Bernardino Downtown Transit Center at E Street and Rialto Avenue, located on the southern portion of the DTSP Area. The San Bernardino Downtown Transit Center is a major first/last-mile connectivity center for intra-City and regional bus and rail transit services by many regional transit agencies. Figure 3.17-5, *DTSP Transit Service*, shows transit services in the DTSP Area.

#### *MetroLink Commuter Rail*

The City of San Bernardino has two Metrolink stations, the San Bernardino - Depot Station located west of Interstate 215 and the San Bernardino - Downtown Station located east of Interstate 215. Trains depart every 10-20 minutes during peak frequency. Service typically operates during the week from approximately 3:41 AM to 9:43 PM, depending on the station. Weekend service typically operates between 6:38 AM to 7:41 PM. The Downtown Station is the easternmost terminus for the San Bernardino Line, which originates approximately 53 miles to the west at Los Angeles Union Station).

#### *Omnitrans Bus Lines*

There are currently 27 Omnitrans bus routes within the larger service area of western San Bernardino County, and 14 operate within San Bernardino. These routes connect to the City from various points, with the majority of routes connecting to the Downtown Transit Center. Routes within San Bernardino typically operate every 20-30 minutes during peak hours. Route 1, for example, operates between Colton and San Bernardino every 20 minutes during peak hours and 30 minutes during off-peak hours on weekdays, every 30 minutes on Saturdays, and on Sundays this service operates every 20-25 minutes. The sBx Green Line operates between Cal State San Bernardino and Loma Linda University every 20 to 30 minutes on weekdays and every 30 minutes on weekends. Some transit lines operate every 60 minutes including Route 10 and Route 312, which operate between San Bernardino and Fontana.

### Redlands Passenger Rail

This northwest-southeast rail service with San Bernardino as the western terminus, also called Arrow, has five stations including the western San Bernardino Downtown Station, and the eastern terminus at University Station just west of Cook Street between Sylvan Boulevard and Central Avenue in the City of Redlands. The five station locations include San Bernardino Downtown Station, Tippecanoe Station, ESRI Station, Redlands Station and the University Station.

Arrow trains run every 30 minutes early mornings and evenings, and every 60 minutes during mid-day. Arrow trains normally run from approximately 3:30 a.m. to 11:30 p.m. on weekdays and from approximately 5:30 a.m. to 11:30 p.m. on weekends (MetroLink 2025).

### Pedestrian Facilities

Figure 3.17-3 shows the pedestrian facilities within the DTSP Area.

### Bicycle Connectivity

There are no existing bike facilities in the DTSP Area, except for an existing Class II on Rialto Avenue. The segment is located between G Street and E Street on the north side of the San Bernardino Downtown Transit Center this segment. Figure 3.17-4 shows the existing and proposed bikeway facilities in the DTSP Area.

## 3.17.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

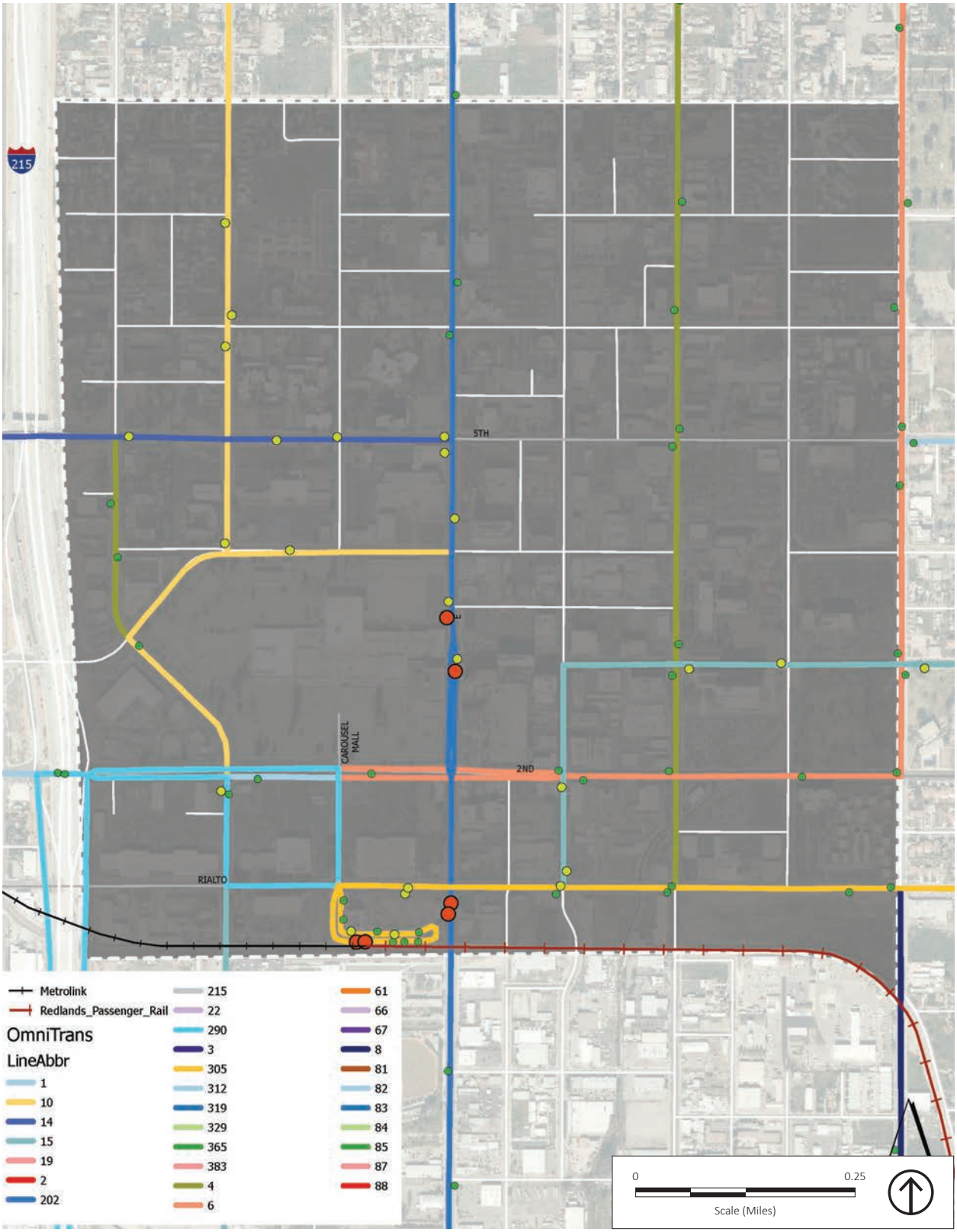
State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning transportation. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning transportation if it would:

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

b) Conflict or be inconsistent with CEQA Guidelines 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.




Source: KOA, 2022.

Figure 3.17-5
**DTSP Transit Service**

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# METHODOLOGY

## General Plan Update

### *Trip Generation*

Trip generation for the General Plan Update was calculated using the land use inputs embedded in the San Bernardino Transportation Analysis Model Plus (SBTAM+). The model generates trips based on households, population, employment, and land use characteristics assigned to each Transportation Analysis Zone (TAZ). These socioeconomic data (SED) inputs reflect the 2019 Base Year, the 2050 No Build forecast, and the 2050 Build scenario incorporating the General Plan land use plan. Future 2050 No Build conditions are based on the default Socioeconomic Data (SED) included in the latest SBTAM+ model. This data is prepared by San Bernardino County and is based on the projects outlined in the most recent long-range planning documents, which includes the existing General Plan for the City of San Bernardino and the most recent Housing Element.

SBTAM+ applies internally calibrated trip generation equations for home-based work, home-based other, non-home-based, and commercial vehicle trips, which are then distributed, assigned, and used to calculate VMT. This approach is standard for General Plan–level analyses because it captures cumulative, systemwide trip-making behavior rather than relying on individual project trip rates.

### *VMT*

The VMT analysis for the General Plan Update was conducted using the San Bernardino Transportation Analysis Model Plus (SBTAM+), the regional travel demand model maintained by SBCTA. Existing (2025) conditions were developed through linear interpolation between the model's 2019 Base Year and 2050 Future Year scenarios, while the 2050 No Build[1] and 2050 Build conditions reflect regional growth assumptions and the land use pattern proposed in the General Plan Update. VMT was calculated using daily origin–destination trip matrices and distance skim matrices, with results reported as VMT per service population (residents plus employees). Two established methodologies were applied: the Standard Metropolitan Statistical Area (SMSA) method, which excludes external–external trips, and the Regional Targets Advisory Committee (RTAC) method, which applies a 50 percent discount to internal–external and

[1] Future 2050 No Build conditions are based on the default Socioeconomic Data (SED) included in the latest SBTAM+ model. This data is prepared by San Bernardino County and is based on the projects outlined in the most recent long-range planning documents, which includes the existing General Plan for the City of San Bernardino and the most recent Housing Element.

external–internal trips. A secondary link-level VMT metric was also prepared, capturing all VMT on roadway links that connect to nodes or TAZs within the City.

Consistent with CEQA, SB 743, and the OPR Technical Advisory (2018), the General Plan Update would result in a significant VMT impact if the Build scenario does not achieve at least a 15 percent reduction in VMT per service population compared to the 2050 No Build condition. This threshold applies to all VMT metrics evaluated in this analysis, including origin–destination VMT per service population (SMSA and RTAC methods) and link-level boundary VMT per service population. If the Build scenario VMT per service population exceeds 85 percent of the No Build value, meaning it does not meet the required 15 percent reduction, the impact would be considered significant under CEQA.

## Downtown Specific Plan Area

### *Trip Generation*

The total net intensities of the land uses was based on the difference between the proposed land uses minus existing land uses, across 11 analyzed zones within the DTSP Area:

- 1,418,372 square feet of retail space
- 1,180,917 square feet of restaurant space
- 4,335,571 square feet of office space (includes government and general office spaces)
- 592,240 square feet of light industrial space
- 14,195 dwelling units of multifamily residential

The DTSP Area trips that would be generated by the proposed land uses were calculated by daily and peak hour rates defined by the Institute of Transportation Engineers (ITE) Trip Generation Manual source. The applied rates are provided in Table 3.17-1, *Trip Generation Rates Applied to Plan Land Uses,* for each use category.

**Table 3.17-1 Trip Generation Rates Applied to Plan Land Uses**

| Land Use Code | Land Use | Daily Total | AM Peak | | | PM Peak | | |
|---|---|---|---|---|---|---|---|---|
| | | | Total | In | Out | Total | In | Out |
| 821 | Shopping Center >40 KSF | 94.49 | 3.53 | 0.62 | 0.38 | 9.03 | 0.48 | 0.52 |
| 930 | Restaurant | 97.14 | 1.43 | 0.5 | 0.5 | 12.55 | 0.55 | 0.45 |
| 710 | General Office | 10.84 | 1.52 | 0.88 | 0.12 | 1.44 | 0.17 | 0.83 |
| 730 | Government Office | 22.59 | 3.34 | 0.75 | 0.25 | 1.71 | 0.25 | 0.75 |
| 110 | Light Industrial | 4.87 | 0.74 | 0.88 | 0.12 | 0.65 | 0.14 | 0.86 |
| 221 | Multifamily (Mid-Rise) | 4.54 | 0.37 | 0.23 | 0.77 | 0.39 | 0.61 | 0.39 |

Source: Appendix I-2.

KSF = 1,000 square feet

Land use codes and related rates are defined by the Institute of Transportation Engineers, Trip Generation Manual, 11th Edition. The Institute of Transportation Engineers released the 12th Edition of the Trip Generation Manual 12th Edition on August 18, 2025, after completion of this analysis in 2022. The analysis relied on the best available data at the time it was prepared.

### *VMT*

VMT numbers per service population were analyzed for the DTSP Area, the City of San Bernardino, and the County of San Bernardino to determine the changes in VMT that would occur due to the DTSP. The use of the VMT per service population provides a measure that is consistent with the City guidelines, and it is calculated through the analysis of both employee trips and resident trips. The VMT calculations also include all vehicle trips and trip purposes for these two types of trips. The model has a base year of 2016 and a future buildout year of 2040, and the VMT analysis was conducted for the model buildout year.

Established City guidelines on VMT and CEQA impacts were applied to the analysis to determine significance. The City of San Bernardino Traffic Impact Analysis Guidelines of August 2020 define VMT impact thresholds based on baseline values within the City.

A project would result in a significant project-generated VMT impact if either of the following conditions occur:

1. The baseline project-generated VMT per service population exceeds the City of San Bernardino General Plan Buildout VMT per service population, or

2. The cumulative project-generated VMT per service population exceeds the City of San Bernardino General Plan Buildout VMT per service population.

The project's effect on VMT would be considered significant if it resulted in the following conditions:

1. The cumulative link-level boundary VMT per service population within the City of San Bernardino increases under the plus project condition compared to the no project condition.

Project VMT that is above these thresholds defines a significant CEQA impact.

## 3.17.4 Project Impact Analysis

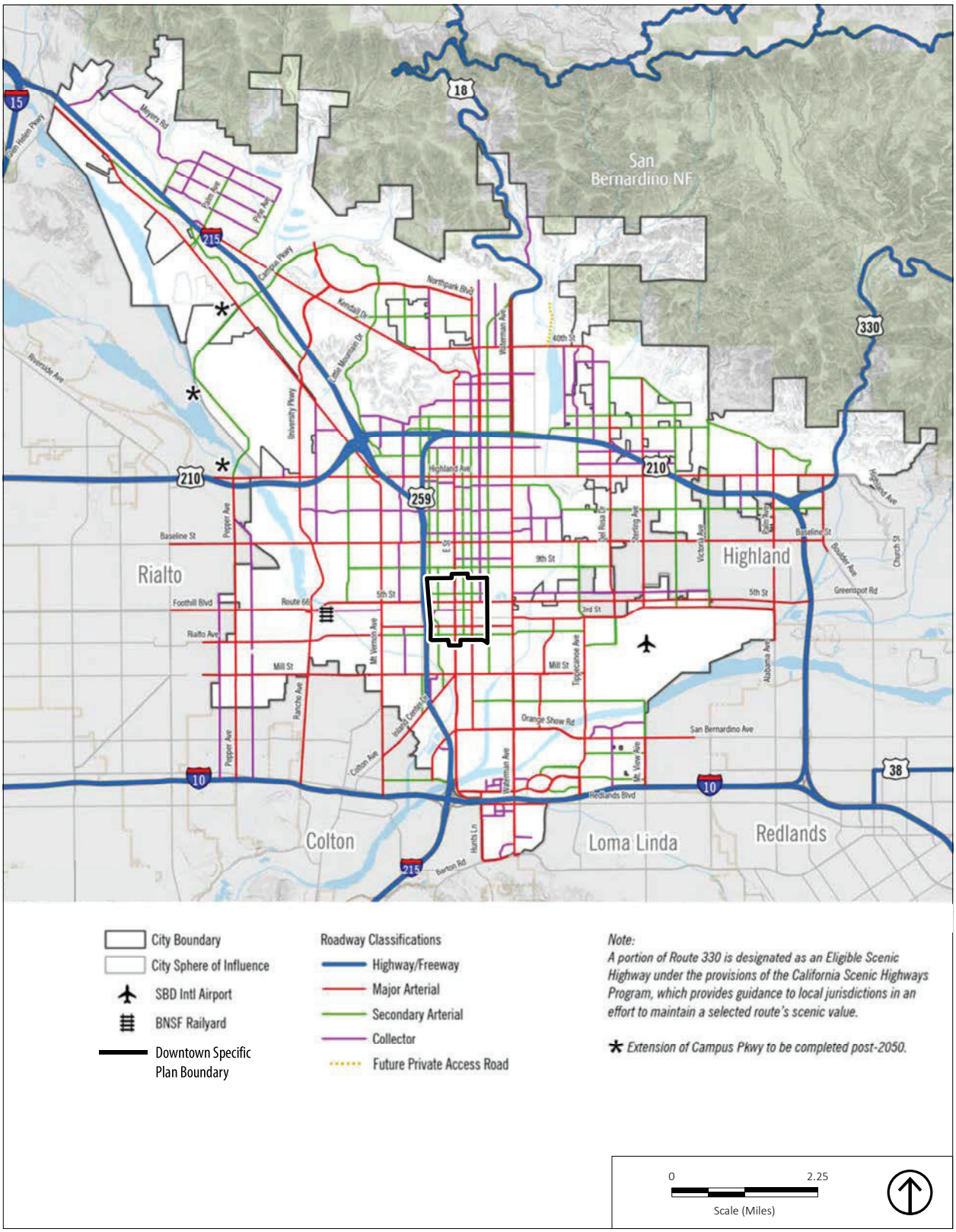
**a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update proposes enhancements and improvements to the multimodal transportation and roadway networks. Figure 3.17-6, *Future Roadway Classification*, shows the proposed changes to the existing roadway. There are potential or anticipated mobility trends that may affect the City's transportation system, which includes potential changes to the roadway as part of infrastructure under construction or planned projects, active transportation projects, modification to transit, emerging technology, and the implementation of transportation demand management (TDM) strategies. These adjustments included lane configuration changes, speed changes, and major transformative projects such as:

- I-215/Little League Drive interchange
- University Parkway/State Street extension to Foothill Boulevard
- Signalization of Rancho Avenue & Foothill Boulevard
- Extension of Campus Parkway south of Kendall Drive to connect to I-215 and addition of an eastern leg on the CSU San Bernardino to connect internally to Campus Circle and to Devils Canyon Road.
- I-210 and Waterman Ave interchange Improvements
- I-215 and University Parkway interchange improvements
- I-210 and Del Rosa Ave interchange improvements

In addition, Figure 3.17-4 also shows the proposed bikeway facilities offered throughout the City.




Source: City of San Bernardino, 2025; Caltrans, 2025.

Figure 3.17-6
**Future Roadway Classification**

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Additionally, the General Plan Update includes multiple policies aimed at ensuring adequate roadway design and providing multimodal facilities. Table 3.17-2, *Circulation System Proposed General Plan Update Policies,* show all the policies and actions that support the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

### Table 3.17-2 Circulation System Proposed General Plan Update Policies

| | |
|---|---|
| **Circulation and Mobility Element** | |
| CM-2.1 | **Equitable multimodal network.** Prioritize the investment of multimodal and active transportation projects, amenities, and services in areas with the highest need for multi-modal transportation choices that are currently underserved |
| CM-2.2 | **Sidewalk connectivity.** Complete the sidewalk network to connect to all destinations in San Bernardino. As much as possible, sidewalks should be available on both sides of the roadways. Where sidewalks already exist, continue to maintain and repair them as needed. |
| CM-2.3 | **Bicycle connectivity.** Expand the bicycle network as proposed in the Active Transportation Plan; make needed infrastructure and landscaping improvements along roadways to facilitate safe travel. |
| CM-2.6 | **Pedestrian and bicycle crossings.** Install enhanced crossing treatments to reduce pedestrian and bicycle collisions with vehicles at multi-lane crossings. Wherever feasible, provide enhanced crossings at all intersections. |
| CM-2.7* | **Bicycle parking and amenities.** Require new developments to plan for bicycle parking and amenities at the beginning of the planning and design process so that the facilities are properly sited in accessible, convenient, and highly visible locations. |
| CM-2.13 | **Complete street improvements.** Require land developers to adhere to the Complete Streets approach for projects that will impact the roadway right-of-way; the improvements should include bicycle and pedestrian facilities that provide connectivity to public transit facilities (if within ½ mile distance). |
| CM-2.14 | **Regional multi-modal transportation network.** Support partner agencies, such as Caltrans, SBCTA, Omnitrans, rail authorities, and adjacent jurisdictions on projects that will contribute to a regional and seamless multi-modal transportation network. |
| CM-3.1 | **Bus transit ridership and frequency.** Support and collaborate with bus transit agencies such as OmniTrans and regional transit authorities to expand transit frequency and coverage concurrent with service needs. |
| CM-3.2 | **Transit amenities.** Upgrade transit stops with amenities (e.g., pedestrian-scale lighting, shelter, seating, secure bicycle parking, signage) that create safer and more comfortable experiences for transit users. Prioritize improvements along major transit corridors, focus areas, highly used transit stops, and mobility hubs |
| CM-3.3 | **First- and last-mile connections.** Provide sidewalks and bikeways, with enhanced intersection treatments, (e.g., raised medians, pedestrian beacons) at transit nodes to complete first- and last-mile connections |

**Table 3.17-2 Circulation System Proposed General Plan Update Policies**

| | |
|---|---|
| **Circulation and Mobility Element** | |
| CM-3.4 | **Mobility hubs.** Enhance mobility hubs at major points of interest, such as the Downtown Transit Center, Santa Fe Depot, and Cal State campus, with programs such as bike-sharing, scooter-sharing, and EV charging stations |
| CM-3.6 | **Rail transit.** Continue coordination with San Bernardino County Transportation Authority (SBCTA), Metrolink, and Amtrak to explore new opportunities for expansion and provide dependable rail service. |
| CM-4.1 | **TDM ordinance.** Develop and implement a citywide Transportation Demand Management Ordinance, including incentives for new developments to provide clarity and additional guidance for the Traffic Impact Analysis Guidelines on how to mitigate VMT. |
| CM-4.2 | **TDM strategies.** Promote TDM strategies appropriate for the local context and land use, for example, to reduce employee commute trips or to reduce discretionary trips such as residential, shopping, or other. |
| CM-4.3 | **TDM in new development.** Require new developments to prioritize the incorporation of TDM strategies into project design at the outset as a means to reduce vehicle miles traveled (VMT) and improve air quality. |
| CM-4.4 | **TDM Monitoring.** Ensure that responsible parties adhere to required TDM commitments that were made as part of their conditions of approval through annual reporting of implemented strategies such as transit incentives, bike facilities, or carpool programs. |

* Denotes mitigating policies

## *SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The proposed General Plan Update generally aligns with the SCAG 2024–2050 RTP/SCS by promoting climate-conscious land use patterns, high-density and mixed-use development, improved jobs–housing balance, and proximity to transit and services. The project supports diverse housing types, community connectivity, economic development, and resource conservation, and is consistent with RTP/SCS goals related to housing, livable communities, economic opportunity, and conservation. See Table 3.11-7, *SCAG 2024-2050 RTP/SCS Goal Consistency Analysis*, in Section 3.11, Land Use and Planning, which provides an analysis of the General Plan Update's consistency to the goals of the RTP/SCS.

Despite including policies to encourage infill development, multimodal transportation, and reduced automobile dependence, implementation would result in significant and unavoidable impacts related to regional air quality, greenhouse gas emissions, and vehicle miles traveled (VMT). These impacts would be inconsistent with RTP/SCS goals focused on reducing VMT, improving air quality, and achieving regional GHG reduction targets. Therefore, this impact is potentially significant.

**Significance without Mitigation:** Potentially significant.

**Impact T-1a: The General Plan Update would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.**

**Mitigation Measures:** Implement Mitigation Measures AIR-1, AIR-2, AIR-3, AIR-4, GHG-1 and GHG-2.

**Significance with Mitigation:** Significant and Unavoidable. Overall, the General Plan Update is consistent with many RTP/SCS goals related to community development, housing, economic vitality, and resource conservation; however, it is inconsistent with key RTP/SCS mobility and environmental goals. Given the scale, intensity, and geographic distribution of growth anticipated under the General Plan Update, no feasible mitigation measures are available that would reduce impacts to regional air quality, greenhouse gas emissions, and vehicle miles traveled while still achieving the objectives and growth envisioned by the General Plan Update. Accordingly, these impacts would remain **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

### Roadway Improvements

As part of the DTSP process, existing transportation conditions and future potential roadway improvements for mobility enhancements were developed and refined. The improvements were developed to accommodate more modes of travel in the DTSP Area, providing for bicycle, transit user, pedestrian, and vehicle travel modes in a more balanced way.

Figure 3.17-7, *Specific Plan Area Roadway Priorities by Mode of Travel,* shows the roadway priorities for various modes of transportation for the DTSP Area, and Figure 3.17-8, *Roadway Configuration Changes Proposed for the Specific Plan Area,* shows the related roadway configurations in terms of vehicle travel lane changes, bicycle facility additions, phased roadway widening, and locations where on-street parking removal would be necessary for implementation of the other improvements. The proposed roadway priorities and roadway improvements as shown in Figure 3.17-7 and Figure 3.17-8, respectively, would be consistent with the General Plan policies pertaining to circulation as listed in Table 3.17-2.

### *SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)*

The DTSP supports mixed-use, high-density, and transit-oriented development and is consistent with many SCAG 2024–2050 RTP/SCS goals related to livable communities, housing diversity, equity, economic development, goods movement, and resource conservation (See Table 3.11-8 *SCAG 2024-2050 RTP/SCS Goals Consistency Analysis*, which provides an analysis of the DTSP's consistency to the goals of the RTP/SCS). Despite including policies to encourage infill development, multimodal transportation, and reduced automobile dependence,

implementation would result in significant and unavoidable impacts related to regional air quality, GHG emissions and VMT. Therefore, the DTSP is inconsistent with key RTP/SCS mobility and environmental goals. Therefore, this impact is considered **potentially significant**.

**Significance without Mitigation:** Potentially Significant.

**Impact T-1b: The Downtown Specific Plan would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.**

**Mitigation Measures:** Implement Mitigation Measures AIR-1, AIR-2, AIR-3, AIR-4.

**Significance with Mitigation:** There are no feasible mitigation measures to fully reduce the DTSP's inconsistencies with the goals of SCAG's 2024–2050 RTP/SCS. As a result, future development in accordance with the DTSP would conflict with plans adopted for the purpose of avoiding or mitigating an environmental effect and project impacts, and cumulative impacts would be **significant and unavoidable**.

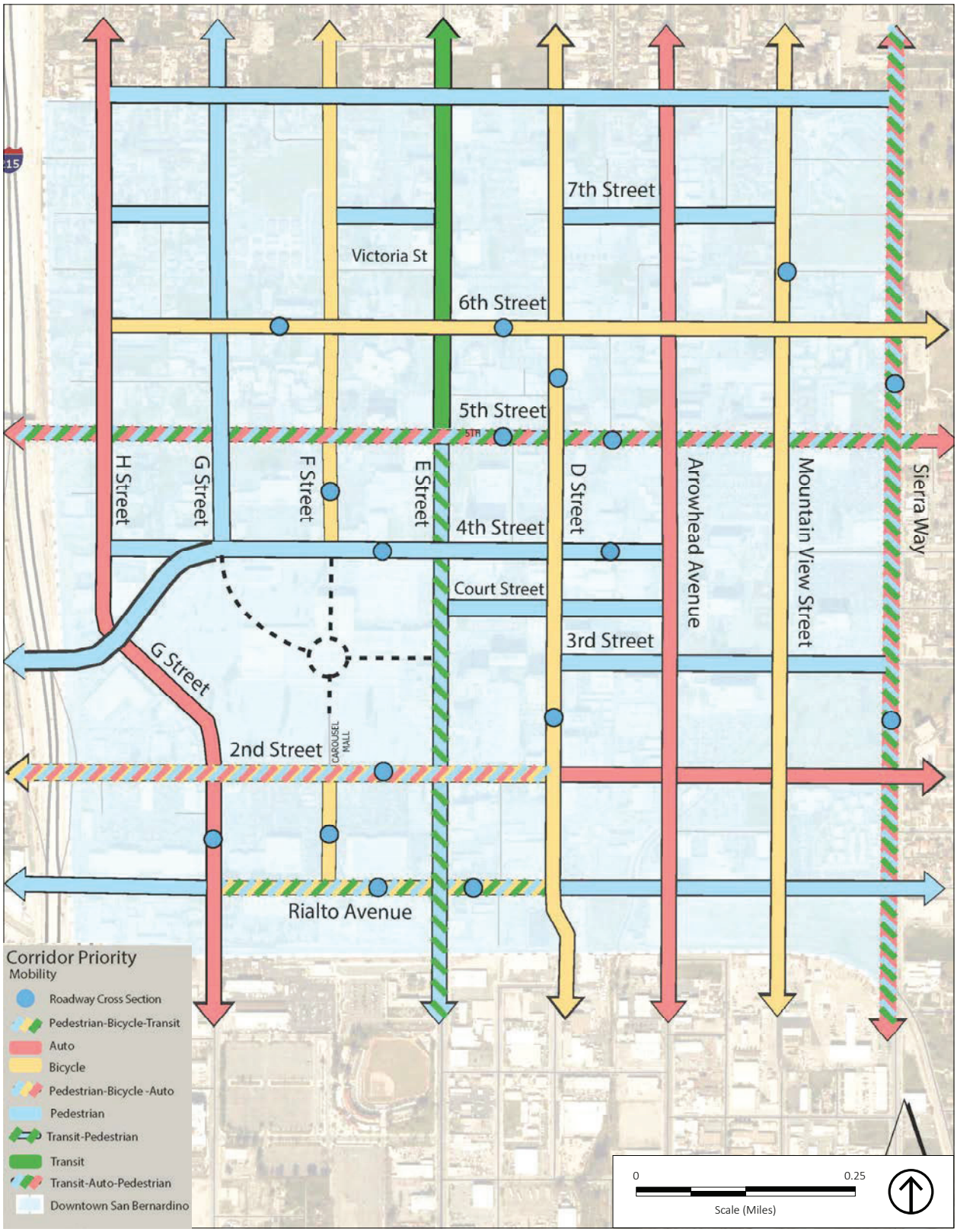
### b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

CEQA Guidelines Section 15064.3(b) requires that transportation impacts be evaluated based on vehicle miles traveled (VMT), rather than level of service, and that projects be assessed using appropriate VMT metrics consistent with state guidance. The California Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018) recommends that land use plans demonstrate a reduction in VMT compared to a No Build condition, with a commonly applied benchmark of a 15 percent reduction, while recognizing that the appropriate metric may vary by project type

To evaluate VMT at a Citywide scale, the General Plan Update was analyzed using multiple VMT metrics consistent with OPR guidance, such as:

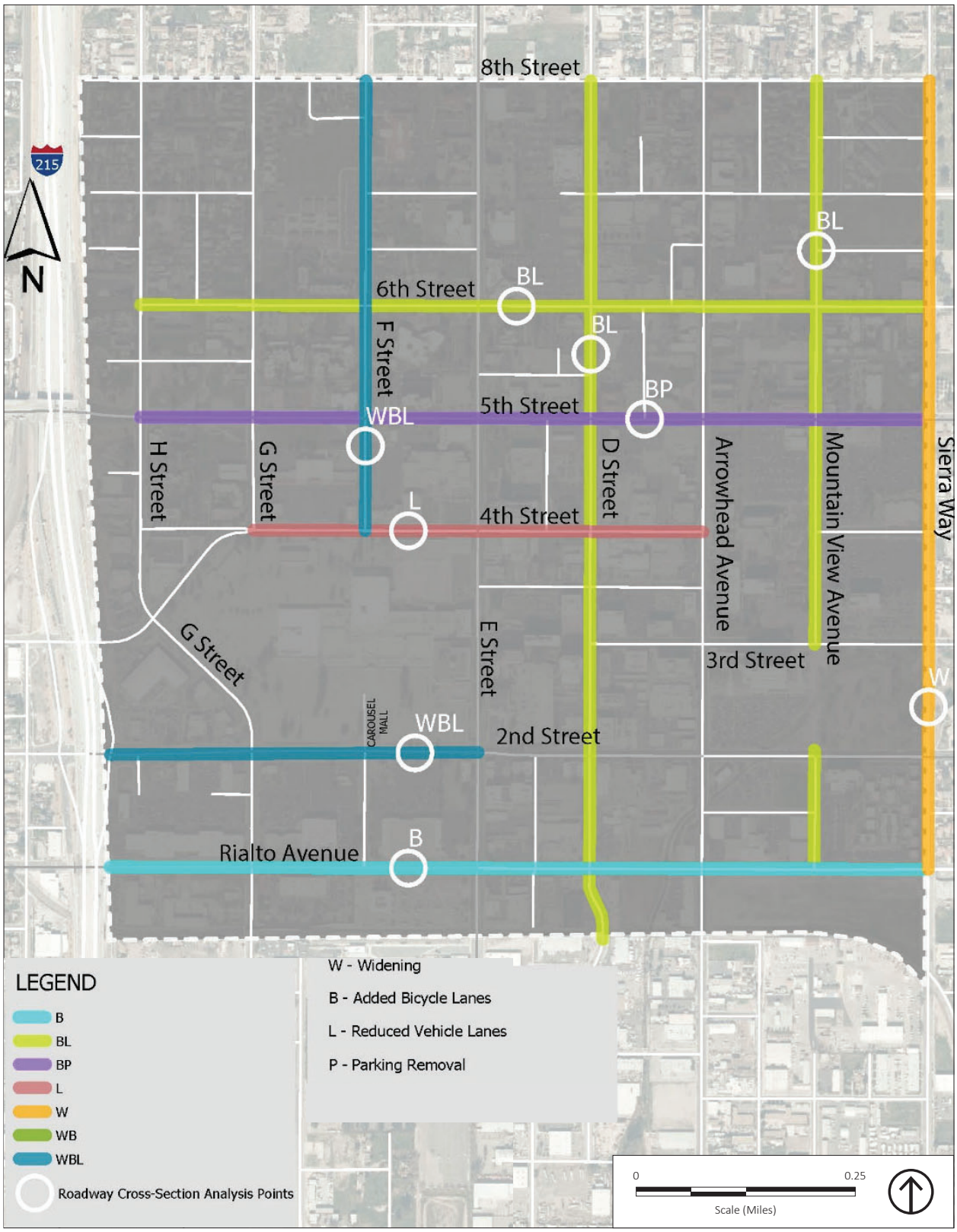
1. Origin-Destination VMT per Service Population using SMSA methodology.
2. Origin-Destination VMT per Service Population using RTAC methodology.




Source: KOA, 2022.

Figure 3.17-7
**Specific Plan Area Roadway Priorities by Mode of Travel**

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Source: KOA, 2022.

Figure 3.17-8
**Roadway Configuration Changes Proposed for the Specific Plan Area**

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The SMSA VMT calculation methodology excludes external-to-external (X-X) trips and includes all other trips in the VMT calculation. RTAC VMT calculation methodology applies to a 50 percent discount to internal-external (I-X) and external-internal (X-I) trips to better reflect local influence over travel behavior. Results from both calculation methods are shown in Table 3.17-3, *Origin-Destination VMT Per Service Population*.

Under the Build scenario, VMT per Service Population shows a slight reduction compared to the No Build scenario using the SMSA methodology and no change under the RTAC methodology. However, neither methodology demonstrates a reduction that meets or exceeds the 15-percent threshold recommended by OPR. While total VMT increases under the Build scenario, this increase reflects growth in service population (residents and employees). Consistent with state and local guidance, the analysis focuses on VMT rates (per-capita VMT), rather than total cumulative VMT.

### Table 3.17-3 Origin-Destination VMT Per Service Population

| Scenario | Residents | Employees | Service Population | I-I VMT | X-I VMT | I-X VMT | VMT per Service Population (SMSA) | VMT per Service Population (RTAC) |
|---|---|---|---|---|---|---|---|---|
| No Build (2050 Baseline SBTAM+) | 298,3000 | 144,913 | 443,213 | 1,884,178.67 | 6,484,021.59 | 6,465,062.84 | 33.47 | 18.86 |
| **State Threshold (15% below No Build)** | | | | | | | **28.45** | **16.03** |
| Build (2050 General Plan) | 330,892 | 172,189 | 503,081 | 2,169,838.39 | 7,307,369.25 | 7,327,527.47 | 33.40 | 18.86 |

Source: Appendix JI-1.

Link-level roadway VMT was also evaluated by selecting roadway links intersecting traffic analysis zone nodes within the City of San Bernardino. As shown in Table 3.17-4, *Link-Level VMT per Service Population*, the Build scenario results in a modest reduction in VMT per Service Population relative to the No Build condition; however, this reduction likewise does not achieve the 15-percent threshold. To meet the recommended benchmark, an additional reduction of approximately 10.4 percent would be required under the link-level methodology, with greater reductions needed under the O-D methodologies.

### Table 3.17-4 Link-Level VMT Per Service Population

| Scenario | Link-Level VMT | Service Population | Link-Level VMT per Service Population |
|---|---|---|---|
| No Build (2050 Baseline SBTAM+) | 8,051,690.26 | 443,213 | 18.17 |
| **State Threshold (15% below No Build)** | | | **15.44** |
| Build (2050 General Plan) | 8,668,947.47 | 503,081 | 17.23 |

Source: Appendix I-1.

The Circulation and Mobility Element includes several policies that enhance the active transportation network throughout the City to encourage residents to bike or walk rather than taking their personal car. Table 3.17-5, *VMT Proposed General Plan Update Policies*, lists these policies related to improving VMT that would apply throughout the General Plan Update Area.

### Table 3.17-5 VMT Proposed General Plan Update Policies

| **Circulation and Mobility Element** | |
|---|---|
| CM-2.1 | **Equitable multimodal network.** Prioritize the investment of multimodal and active transportation projects, amenities, and services in areas with the highest need for multi-modal transportation choices that are currently underserved. |
| CM-2.2 | **Sidewalk connectivity.** Complete the sidewalk network to connect to all destinations in San Bernardino. As much as possible, sidewalks should be available on both sides of the roadways. Where sidewalks already exist, continue to maintain and repair them as needed. |
| CM-2.3 | **Bicycle connectivity.** Expand the bicycle network as proposed in the Active Transportation Plan; make needed infrastructure and landscaping improvements along roadways to facilitate safe travel. |
| CM-2.4 | **Walkways, paseos, and shared-use paths.** Identify and expand the City's pedestrian and bicycle network to include creative and context-sensitive opportunities, including but not limited to: paseos and walkways, shared use paths along abandoned rail tracks (rail trails), |

### Table 3.17-5 VMT Proposed General Plan Update Policies

| | |
|---|---|
| **Circulation and Mobility Element** | |
| CM-2.5 | **Surface parking and driveways.** Coordinate driveways and surface parking along corridors in the focus areas to allow for continuous pedestrian-travel pathways and to reduce conflict between pedestrians and motorists. |
| CM-2.6 | **Pedestrian and bicycle crossings.** Install enhanced crossing treatments to reduce pedestrian and bicycle collisions with vehicles at multi-lane crossings. Wherever feasible, provide enhanced crossings at all intersections. |
| CM-2.7 | **Bicycle parking and amenities.** Require new developments to plan for bicycle parking and amenities at the beginning of the planning and design process so that the facilities are properly sited in accessible, convenient, and highly visible locations. |
| CM-4.1 | **TDM ordinance.** Develop and implement a citywide Transportation Demand Management Ordinance, including incentives for new developments to provide clarity and additional guidance for the Traffic Impact Analysis Guidelines on how to mitigate VMT. |
| CM-4.2 | **TDM strategies.** Promote TDM strategies appropriate for the local context and land use, for example, to reduce employee commute trips or to reduce discretionary trips such as residential, shopping, or other. |
| CM-4.3* | **TDM in new development.** Require new developments to prioritize the incorporation of TDM strategies into project design at the outset as a means to reduce vehicle miles traveled (VMT) and improve air quality. |
| CM-4.4 | **TDM monitoring**. Ensure that responsible parties adhere to required TDM commitments that were made as part of their conditions of approval through annual reporting of implemented strategies such as transit incentives, bike facilities, or carpool programs. |
| CM-4.6 | **Transit Passes.** Continue to support and expand, as feasible, OmniTrans' efforts to offer free or reduced-fare transit passes for students, seniors, low-income households, people with disabilities, and City employees. |

* Denotes mitigating policies

While these policies create an environment that encourages different transportation alternatives, due to the uncertainty regarding the actual development pattern, population growth, and other factors that are outside of the purview and control of the City, it is difficult to rely on the reduction of VMT suggested by the modeling. Further, for the active transportation features to be effective they need to connect employment, residential, and commercial land uses. The following are example mitigation measures that could be considered to be implemented at the Citywide level in order to mitigate the significant impacts associated with the General Plan Update, as well as project-level CEQA clearances for future development projects.

The City of San Bernardino could prioritize Transportation Demand Management (TDM) strategies over roadway capacity expansion to reduce adverse VMT impacts.

- TDM measures selected consistent with Federal Highway Administration guidance (Known Effectiveness of TDM Strategies) and tailored to site-specific conditions, including transit availability and surrounding employment density.
- Higher-intensity TDM measures applied in areas with higher employment density, while lower-intensity support and information strategies shall be applied in areas with lower employment density.
- Downtown San Bernardino and the University District could be considered "Moderate Transit" areas, while other locations shall be treated as "Low Transit" areas.
- TDM reductions could be applied to deficient intersections and roadway segments, as summarized in Table 20, *VMT Reduction TDM Strategies Currently in Place*, in Appendix 3.17-1, to achieve the maximum feasible reduction in vehicle trips.

Since the General Plan Update is a regulatory document that sets the framework for future growth and development in the City and does not directly result in development, and thus VMT, use of VMT reduction strategies would need to be assessed on a project-by-project basis. As the VMT shown in Tables 3.17-3 and 3.17-4 will only result when the road network and improvements envisioned by the Circulation and Mobility Element are complete, projects considered consistent with the General Plan, but prior to the buildout planning horizon are likely to have higher VMT even with application of mitigation measures. Therefore, VMT impacts are considered **potentially significant.**

**Significance without Mitigation:** Potentially Significant.

**Impact T-2a: The General Plan Update would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).**

**Mitigation Measures**: No mitigation measures are available to reduce impacts to less than significant.

**Significance with Mitigation:** Significant and Unavoidable. While implementation of TDM strategies would reduce VMT and vehicle trip generation, the effectiveness and applicability of such measures would be determined on a project-by-project basis and cannot be guaranteed at the General Plan level. No additional feasible mitigation measures are available that would ensure achievement of the 15-percent VMT reduction threshold Citywide. Therefore, impacts related to VMT would remain **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

Table 3.17-6, *Project Land Use Plan Total Area VMT Effects,* provides the baseline and with-Project conditions analysis, for the DTSP Area, the City, and the County:

- The DTSP Area has a future baseline VMT per service population of 44.23, and the City has the lowest value of 34.99.
- The County baseline value is in between these VMT numbers, which is 39.73.
- The DTSP Area with the proposed land uses would have a total VMT per service population of 24.15, which is approximately 45 percent lower than the baseline average.
- For the City, the VMT would be approximately 16 percent lower with the DTSP, and within the County the VMT would be 11 percent lower.

**Table 3.17-6 Project Land Use Plan Total Area VMT Effects**

| Future (2040) Without Project Conditions | | | | | |
|---|---|---|---|---|---|
| **Area** | **Total VMT** | **Residents** | **Employees** | **Service Population** | **Total VMT/SP** |
| DTSP TAZs | 1,108,374 | 5,421 | 19,639 | 25,060 | 44.23 |
| City of San Bernardino | 13,140,295 | 248,002 | 127,540 | 375,542 | 34.99 |
| San Bernardino County | 148,990,732 | 2,721,775 | 1,027,872 | 3,749,647 | 39.73 |
| **Future (2040) with Project Conditions** | | | | | |
| **Area** | **Total VMT** | **Residents** | **Employees** | **Service Population** | **Total VMT/SP** |
| DTSP TAZs | 2,072,594 | 45,535 | 40,299 | 85,834 | 24.15 |
| City of San Bernardino | 12,398,065 | 280,829 | 142,173 | 423,002 | 29.31 |
| San Bernardino County | 131,817,836 | 2,727,561 | 1,031,457 | 3,759,018 | 35.07 |

Source: Appendix I-3.

As implementation of the DTSP would reduce all VMT values for the analyzed local and regional areas, impacts would be less than significant.

Table 3.17-7, *Project Land Use Plan VMT*, summarizes the DTSP's direct effect on VMT, for the City, adjacent areas including the City within a 10-mile radius, and the County.

**Table 3.17-7 Project Land Use Plan Total Area VMT Effects**

| | Future (2040) Without and With Project Conditions | | |
|---|---|---|---|
| **Analysis Region** | **Without Project** | **With Project** | **Change** |
| City of San Bernardino | 4,651,827 | 4,767,563 | 115,736 |
| Within 10 miles of DTSP | 25,284,451 | 25,201,771 | -82,680 |
| San Bernardino County | 86,491,876 | 86,357,365 | -134,510 |

Source: Appendix I-3.

The DTSP would result in an increase in the VMT along local City roadways. However, for the VMT change on the roadways within a 10-mile radius of the DTSP Area, the DTSP results in a decrease in VMT along these roadways. Adding the DTSP uses would, therefore, increase trips locally within the City but would eliminate longer trips that extend beyond the City's boundary, including overall trips within the County that extend beyond the 10-mile radius. As the VMT shown in Tables 3.17-6 and 3.17-7 would only result when the road network and improvements envisioned by the Circulation and Mobility Element as part of the General Plan Update are complete, and no physical development or roadway improvements are proposed under the DTSP that would lead to the reduction of VMT, projects considered consistent with the DTSP, but prior to the buildout planning horizon are likely to have higher VMT even with application of mitigation measures. Therefore, VMT impacts are considered **potentially significant.**

**Significance without Mitigation:** Potentially Significant.

**Impact T-2b: The Downtown Specific Plan would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).**

**Mitigation Measures**: No mitigation measures are available to reduce impacts to less than significant.

**Significance with Mitigation:** Significant and Unavoidable. While implementation of TDM strategies would reduce VMT and vehicle trip generation, the effectiveness and applicability of such measures would be determined on a project-by-project basis and cannot be guaranteed at the DTSP level. No additional feasible mitigation measures are available that would ensure

achievement of the City's VMT guidelines thresholds. Therefore, impacts related to VMT would remain **significant and unavoidable**.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Buildout of the General Plan Update would involve the alteration, intensification, and redistribution of land uses throughout the City; however, it would not substantially increase hazards related to roadway geometric design or incompatible uses. All circulation network improvements under the General Plan Update would be subject to review and approval by the City of San Bernardino Public Works Department, including evaluation of roadway alignments, intersection geometry, and traffic control features to ensure conformance with the City's street improvement design policies and Public Works standards (San Bernardino 1987).

Additionally, the General Plan Update includes policies to improve safety for all roadway users as listed in Table 3.17-8, *Geometric Design Features: Proposed General Plan Update Policies,* show all the policies and actions that would minimize impacts. Compliance with these policies and the City's Public Works Department standards would ensure that development does not contribute to roadway hazards or result in incompatible uses. Therefore, this impact would be **less than significant**.

**Table 3.17-8 Geometric Design Features: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-1.3 | **Hazard and evacuation route awareness.** Promote hazard preparedness and awareness of evacuation routes to all residents, ensuring resources are available in multiple languages and formats for people with different or limited access and functional needs. |
| S-1.12* | **Evacuation access.** Require new development in a Fire Hazard Severity Zone as shown in the most current CAL FIRE map, to identify at least two points of access for day-to-day access and evacuation purposes and make improvements to ensure adequate capacity of evacuation routes. |
| S-1.13* | **Emergency evacuation routes**. Ensure emergency evacuation routes are built and maintained to remain open during and after disasters. Reassess evacuation routes and develop a multi-hazard evacuation plan to ensure routes are functional |
| S-1.14 | **Evacuation constrained parcels.** Explore secondary means of ingress and egress in areas with evacuation constraints, as shown in **Figure S-3**, Evacuation Constrained Residential Parcels, for existing subdivisions or developments of 10 units or more. |

* Denotes mitigating policies

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

All future development under the DTSP would undergo an extensive review process at the City to ensure consistency with the City's engineering standards and roadway design standards. Additionally, the fire department reviews all development applications to ensure that adequate emergency accessibility is provided based on local and state guidance. Moreover, as shown in Figure 3.17-4, the General Plan Update would improve the circulation system through adding bicycle lanes, widening roadway, and removing on-street parking as necessary for the implementation of other improvements. Therefore, future projects undergoing plan review, as well as the proposed roadway improvements, would ensure impacts would be less than significant. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

### d) Would the project result in inadequate emergency access?

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As shown in Figure 3.20-4, *Potential Evacuation Routes*, and Figure 3.20-5, *Evacuation Constrained Residential Parcels*, in Section 3.9, Hazards and Hazardous Materials, certain areas of the City contain residential parcels and corridors with evacuation constraints. While implementation of the General Plan Update could indirectly introduce new residents and employees, potentially increasing use of these constrained areas, all future development would be subject to comprehensive City of San Bernardino review to ensure consistency with applicable development and roadway design standards, including requirements for adequate ingress, egress, and emergency vehicle access. During the City's development review process, before construction, projects must demonstrate suitable access, including minimum drive aisle widths, turning radii, and multiple points of entry and exit where applicable, to accommodate both everyday traffic and emergency response vehicles, in accordance with the City's Standard Development Requirements and Public Works review criteria (San Bernardino 2025).

In addition, emergency access is governed by fire apparatus access standards adopted by the San Bernardino County Fire Protection District (SBCFPD), which establish minimum requirements for fire apparatus access roads, including width, turnarounds, and secondary access where needed; for example, fire apparatus access must be provided to within 150 feet of structures and, where multiple access points are required, they must meet minimum spacing and access criteria. (San Bernardino County 2023)

Table 3.17-9*, Emergency Access Proposed General Plan Update Policies*, identifies the policies and actions intended to minimize impacts associated with inadequate emergency access, which

would further ensure the project's consistency with emergency access requirements through implementation of these policies.

### Table 3.17-9 Emergency Access Proposed General Plan Update Policies

| | |
|---|---|
| **Safety Element** | |
| S-1.3 | **Hazard and evacuation route awareness.** Promote hazard preparedness and awareness of evacuation routes to all residents, ensuring resources are available in multiple languages and formats for people with different or limited access and functional needs. |
| S-1.12* | **Evacuation access.** Require new development in a Fire Hazard Severity Zone, as shown in the most current CAL FIRE map, to identify at least two points of access for day-to-day access and evacuation purposes and make improvements to ensure adequate capacity of routes. |
| S-1.13* | **Emergency evacuation routes**. Ensure emergency evacuation routes are built and maintained to remain open during and after disasters. Reassess evacuation routes and develop a multi-hazard evacuation plan to ensure routes are functional. |
| S-1.14 | **Evacuation constrained parcels.** Explore secondary means of ingress and egress in areas with evacuation constraints, as shown in **Figure S-3**, Evacuation Constrained Residential Parcels, for existing subdivisions or developments of 10 units or more. |
| **Circulation and Mobility Element** | |
| CM-1.7 | **Emergency Access.** Continue to prioritize redesign of travel routes to promote emergency access, especially in the northern areas of the City. Maintain unobstructed roadway space for fire apparatus and emergency vehicle access as identified in the Safety Element. |

* Denotes mitigating policies

Because future development under the General Plan Update would be required to comply with City standards, Public Works review criteria, and SBCFPD fire access requirements and because the General Plan Update includes specific policies to maintain and improve emergency access impacts related to inadequate emergency access would be **less than significant.**

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As shown in Figure 3.20-4, primary evacuation routes within the DTSP Area include 5th Street, E Street, Rialto Avenue, and a portion of 2nd Street. Figure 3.20-5 indicates that no residential parcels within the DTSP area are subject to evacuation constraints.

Construction activities associated with future development could temporarily block roadways or require traffic diversions. Since the location and extent of such blockages or diversions are not yet determined, the City relies on its standard development review process to evaluate future requests. Temporary road closures or detours could affect emergency response times, but all

such activities must be approved by the City's Department of Public Works prior to construction. Projects requiring lane or road closures must coordinate with the Public Works Department, Engineering Division, which oversees right-of-way activities and issues Road Closure / Right-of-Way (ROW) permits. Applicants are required to submit a completed ROW permit application, a detailed Traffic Control Plan, and proposed closure duration for review and approval (City of San Bernardino, 2014; 2025). Depending on the project scope and location, additional coordination may be required with the Fire Department to ensure emergency access and with the Police Department for traffic enforcement and public safety.

Because the DTSP would not permanently alter any designated evacuation route identified in Figure 3.20-4, and because existing development review procedures ensure that temporary access limitations or detours are reviewed and approved by Public Works and emergency services, the DTSP would not result in an inadequate emergency access. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## 3.17.5 Cumulative Impact Analysis

The cumulative setting for transportation impacts includes buildout of the General Plan Update, implementation of the DTSP, and other past, present, and reasonably foreseeable development within the City of San Bernardino and the surrounding region. Cumulative transportation conditions reflect regional growth projections prepared by SCAG and transportation infrastructure improvements included in the SBTAM+, maintained by the SBCTA.

**Would the project have a cumulative effect related to transportation?**

### Circulation System

Implementation of the proposed project would not conflict with adopted plans or policies related to the circulation system. The proposed project, including the City of San Bernardino and DTSP, is consistent with regional planning documents such as the RTP/SCS, which establishes goals and policies for transportation and circulation across the region and accounts for cumulative growth. Future development in the surrounding region would be required to remain consistent with these regional frameworks, which are designed to address systemwide mobility needs under cumulative conditions. Therefore, the project's cumulative contribution to circulation system impacts would be **less than significant.**

### Geometric Hazards

All circulation network improvements under the General Plan Update would be subject to review and approval by the City of San Bernardino Public Works Department to ensure

compliance with the City's street improvement design policies and Public Works safety standards. Similarly, future projects in the surrounding region would be required to undergo project-level review and approval by the applicable jurisdiction to ensure consistency with adopted design standards and to minimize potential geometric hazards. Therefore, the proposed project's contribution to cumulative impacts related to geometric hazards would be less than cumulatively considerable and **less than significant.**

### Emergency Access

As shown in Figure 3.20-4 and Figure 3.20-5 in Section 3.20, *Wildfire*, certain areas of the City include residential parcels and corridors with evacuation constraints. While implementation of the General Plan Update could incrementally increase the number of residents and employees in these areas, all future development would be subject to City of San Bernardino review to ensure compliance with applicable roadway design and emergency access standards, including adequate ingress, egress, and emergency vehicle access. Similarly, cumulative development in the surrounding region would be subject to comparable jurisdictional review and emergency access requirements. Through adherence to these standards and review processes, the project's contribution to cumulative impacts related to emergency access would be less than cumulatively considerable and **less than significant.**

### VMT

Cumulative transportation impacts related to VMT were evaluated using Citywide and regional modeling that accounts for cumulative growth under SCAG projections and transportation improvements included in SBTAM+. While the General Plan Update land use pattern results in a slight reduction in VMT per Service Population compared to a No Build condition, the modeled reductions do not meet the 15-percent benchmark commonly recommended in OPR guidance. Although the Circulation and Mobility Element includes numerous policies promoting infill development, land use mixing, active transportation, transit use, and TDM strategies, the effectiveness of these measures in achieving cumulative VMT reductions is uncertain at the General Plan level. Future development patterns, market conditions, travel behavior, and implementation timing of multimodal infrastructure are influenced by factors outside the City's direct control. As a result, reliance on modeled VMT reductions to conclude a less-than-significant cumulative impact would be speculative. Consistent with the project-level analysis, cumulative transportation impacts related to VMT are conservatively considered significant and unavoidable, even with implementation of General Plan policies and TDM strategies.

While the land use pattern envisioned under the proposed General Plan would result in a modest reduction in VMT per Service Population compared to a No Build condition, uncertainty regarding future development patterns, population growth, market conditions, and other factors outside the City's direct control limits the ability to rely on modeled reductions at the cumulative level. Therefore, cumulative transportation impacts related to VMT are conservatively considered **cumulatively considerable**.

**Impact T-3: The proposed project, in combination with past, present, and reasonably foreseeable projects, could result in cumulative with respect to VMT per service population.**

**Mitigation Measures:** No mitigation measures are feasible.

**Significance without Mitigation:** Significant and unavoidable. Buildout of the proposed General Plan Update would result in a level of VMT per service population that does not meet the threshold (15 percent reduction compared to No Build conditions) needed to achieve less than significant impacts. Individual development under the General Plan Update would implement TDM strategies and other General Plan Update policies that would reduce VMT impacts on a project level. However, at the programmatic level, impacts would remain **significant and unavoidable and cumulatively considerable**.

## 3.17.6 References

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# 3.18 TRIBAL CULTURAL RESOURCES

This section describes the tribal cultural-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project." Summaries of the relevant regulatory framework and existing conditions are followed by a discussion of the project-specific and cumulative impacts. Tribal cultural resources include landscapes, sacred places, or objects with a cultural value to a California Native tribe. This section of the DEIR evaluates the potential for the proposed project to impact tribal cultural resources in the City of San Bernardino Other potential impacts to cultural resources (i.e., historic, archaeological, and disturbance of human remains) are evaluated in Section 3.5, *Cultural Resources*.

The analysis in this section is based in part on information from an existing conditions cultural resources report that was prepared by ECORP Consulting (ECORP). Additionally, an Archaeological built environment model and accompanying technical report was provided by ECORP; however, these documents are designated as confidential. Accordingly, these materials are not included in an appendix, in this DEIR. While the Archaeological materials are identified and listed for informational purposes, they are not attached due to confidentiality restrictions.

## 3.18.1 Regulatory Framework

### FEDERAL

#### Archaeological Resources Protection Act

The Archaeological Resources Protection Act (United States Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

#### Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (United States Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Indian tribes.

## STATE

### California Public Resources Code Sections 5097.9-5097.991

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code (PRC). In addition, cultural resources are recognized as a nonrenewable resource and therefore, receive protection under the California PRC and CEQA. California Public Resources Code Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources, and sacred sites and identifies the powers and duties of the Native American Heritage Commission (NAHC). California Public Resources Code Sections 5097.9-5097.991 also require notification to descendants of discoveries of Native American human remains and provides for treatment and disposition of human remains and associated grave goods.

### California Public Resources Code Sections 21073 and 20174

Public Resource Code Sections 21073 and 21074 define California Native American tribe and tribal cultural resources, respectively. Public Resource Code Section 21073 defines a "California Native American tribe" as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC).

Tribal cultural resources (TCRs) are defined in Section 21074 as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the CRHR, or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are 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 Section 5024.1.

### California Health and Safety Code

California Health and Safety Code Section 7050.5 requires that if human remains are discovered on the project area, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

### California Register of Historical Resources

The California Register of Historic Resources is the state version of the National Register of Historic Resources program. It was enacted in 1992 and became official on January 1, 1993. The

California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of PRC Section 5024.1, a resource may be listed as a historical resource in the California Register if it meets any of the four National Register criteria.

## California Senate Bill 18 (SB 18)

Existing law provides limited protection for Native American prehistoric, archaeological, cultural, spiritual, and ceremonial places. These places may include sanctified cemeteries, religious sites, ceremonial sites, shrines, burial grounds, prehistoric ruins, archaeological or historic sites, Native American rock art inscriptions, or features of Native American historic, cultural, and sacred sites.

SB 18 was signed into law in September 2004 and went into effect on March 1, 2005. It placed new requirements upon local governments for developments within or near "traditional tribal cultural places" (TTCP). Per SB 18, the law requires local jurisdictions to provide opportunities for involvement of California Native American tribes in the land planning process for the purpose of preserving traditional tribal cultural places. The Office of Planning and Research's Tribal Consultation Guidelines, adopted on November 14, 2005, provides advisory guidance to cities and counties on the process for consulting with Native American tribes during the adoption or amendment of local general plans or specific plans; the Tribal Consultation Guidelines recommend that the NAHC provide written information as soon as possible but no later than 30 days after receiving a request to inform the lead agency if the proposed project is determined to be in proximity to a TTCP and another 90 days for tribes to respond to notices provided by local governments if they want to consult to determine whether the project would have an adverse impact on the TTCP. There is no statutory limit on the consultation duration. Prior to the adoption or amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located in the city or county's jurisdiction; the referral must allow a 45day comment period. The CEQA public distribution list shall include tribes provided by the NAHC. If the NAHC, the tribe, and interested parties agree upon the mitigation measures necessary for the proposed project, they would be included in the project's EIR.

SB 18 is triggered before the adoption, revision, amendment, or update of a city's or county's general plan. Although SB 18 does not specifically mention consultation or notice requirements for the adoption or amendment of specific plans, the Final Tribal Guidelines advises that SB 18 requirements extend to specific plans as well, because state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (defined in Government Code § 65453). In addition, SB 18 provides a new definition of TTCP requiring a traditional association of the site with Native American traditional beliefs, cultural practices, or ceremonies, or the site must be shown to actually have been used for

activities related to traditional beliefs, cultural practices, or ceremonies. (Previously, the site was defined to require only an association with traditional beliefs, practices, lifeways, and ceremonial activities). SB 18 also amended Civil Code Section 815.3 and added California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

### California Assembly Bill 52 (AB 52)

AB 52 took effect July 1, 2015, and requires inclusion of a new section in CEQA documents titled Tribal Cultural Resources, which include heritage sites. Under AB 52, a tribal cultural resource is defined similar to tribal cultural places under SB 18—sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. Or the lead agency, supported by substantial evidence, chooses at its discretion to treat the resources as a tribal cultural resource.

Similar to SB 18, AB 52 requires consultation with tribes at an early stage to determine whether the project would have an adverse impact on any TCRs and if so to identify mitigation measures to protect them. Per AB 52, within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it. The tribe then has 30 days from receiving the notification to respond if it wishes to engage in formal consultation. The lead agency must initiate consultation within 30 days of receiving the request from the tribe. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

## LOCAL

### City of San Bernardino General Plan

The Cultural Resources Element provides tribal history within the city as well as policies aimed at protecting tribal cultural resources and consulting with tribal leaders. These goals, policies and implementation measures provide guidance and policy direction regarding tribal cultural resources in the City as well as help reduce impacts to such resources.

## 3.18.2 Existing Conditions

### PRE-CONTACT BACKGROUND

Evidence from archaeological sites indicate that people have lived in the San Bernardino Valley from around 12,000 B.P. to today. San Bernardino is located within the territory known to have been occupied by the Serrano group of Native Americans at the time of contact with Europeans, around AD 1769.

The Serrano occupied an area in and around the San Bernardino Mountains and northward into the Mojave Desert. Their territory also extended west along the north slope of the San Gabriel Mountains, east as far as Twentynine Palms, north into the Victorville and Lucerne Valley areas, and south to the Yucaipa Valley and San Jacinto Valley.

Settlement locations were determined by water availability, and most Serranos lived in villages near water sources. Houses and ramadas were round and constructed of poles covered with bark and tule mats (Kroeber 1925. Most Serrano villages also had a ceremonial house used as a religious center. Other structures within the village might include granaries and sweathouses (Bean and Smith 1978).

Partly due to their mountainous and desert inland territory, contact between Serrano and European Americans was minimal prior to the early 1800s. In 1819, an asistencia (mission outpost) was established near present-day Redlands and was used to help relocate many Serrano to Mission San Gabriel. However, small groups of Serrano remained in the area northeast of the San Gorgonio Pass and were able to preserve some of their native culture. Today, most Serrano live either on the Morongo or San Manuel reservations ( Bean and Smith 1978).

### NATIVE AMERICAN SETTLEMENTS

The San Bernardino Valley's first inhabitants were Native Americans who settled along the Santa Ana River as early as 8000 BC. Natives living in the valley when the Spanish arrived were Uto-Aztecan, Takic speakers, possibly from the Serrano, Luiseño, and Gabrieleño tribes. Later, a Mountain Cahuilla group was brought to the valley by the local Spanish family to work their rancho. Prehistoric sites in the planning area represent at least three periods of Native American occupation—the Milling Stone, Late Prehistoric, and Protohistoric periods—dating from around 3000 BC to the mid-19th century AD. These prehistoric sites include food procurement sites, specialized lithic technology sites, and seasonal habitation sites.

The only local Native American community in residence today is the Yuhaaviatam of the San Manuel Nation from the Serrano group. In 1866, a conflict came to the area, and militia forces from San Bernardino killed Serrano men, women, and children in a 32-day campaign. Their

Yuhaviatam tribal leader, Santos Manuel, safely led the remaining Yuhaviatam from their homelands to the valley floor. In 1891, the federal government recognized the reservation as a sovereign nation through Presidential Executive Order (San Bernardino 2025).

## AB 52 CONSULTATION

The City requested a local government tribal consultation list from the NAHC in July 2025. On August 7, 2025, the City sent 42 letters to notify 21 tribes, pursuant to AB 52, that have requested to be notified of all projects within the tribe's area of traditional and cultural affiliation including:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Cahuilla Indians
- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno-Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Nation
- Gabrielino-Tongva Tribe
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pechanga Band of Indians
- Quechan Indian Tribe of the Fort Yuma Reservation
- Ramona Band of Cahuilla
- Rincon Band of Luiseno Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseno Indians
- Torres-Martinez Desert Cahuilla Indians.

No requests for consultation were received by the City from notified tribes within the allotted consultation period.

### SB 18 CONSULTATION

The City requested a local government tribal consultation list from the NAHC in July 2025. On August 7, 2025, the City sent 42 letters to notify 21 tribes, as listed above, pursuant to SB 18, that have requested to be notified of all projects within the tribe's area of traditional and cultural affiliation. No requests for consultation were received by the City from notified tribes.

## 3.18.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning tribal cultural resources. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning tribal cultural resources if it would:

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

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

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

### METHODOLOGY

#### Sacred Lands File Search

As discussed further in Section 3.5, *Cultural Resources*, on April 22, 2021, the California Native American Heritage Commission (NAHC) was contacted to request a search of the Sacred Lands File for the Area of Potential Effects (APE). The Sacred Lands File is maintained by the NAHC and populated with information provided by California Native American tribes who have knowledge of the locations of tribal cultural resources. The purpose of this request was to determine whether any Sacred Lands have been identified within the APE by Native American tribes. The

results of this search while confidential, contribute to the overall assessment of tribal cultural resource sensitivity within the City of San Bernardino.

## AB 52 and SB 18

In accordance with AB 52 and SB 18 requirements, the City sent invitation letters on August 7, 2025 to the Native American contacts provided by the NAHC and tribes who had previously requested consultation, formally inviting tribes to consult with the City on the proposed project. The intent of consultations is to provide an opportunity for interested Native American contacts to work with the City during the project planning process to identify and protect Tribal Cultural Resources. To date, no Tribes have requested consultation on the proposed project.

**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)?**

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The results of the Sacred Lands File search by the NAHC were received on May 7, 2021. The search of the Sacred Lands File was positive, indicating the presence of Native American Sacred Lands or tribal cultural resources in the General Plan Update Area. The location of sacred sites is not disclosed on sensitivity maps; however, it was used to inform the sensitivity of general areas within the General Plan Update Area. Table 3.18-1, *Tribal Cultural Resources: Proposed General Plan Update Policies,* show all the policies and actions that would minimize impacts related to tribal cultural resources.

**Table 3.18-1 Tribal Cultural Resources: Proposed General Plan Update Policies**

| | |
|---|---|
| **Cultural Resources Element** | |
| CR-3.5 | **Native American Consultation.** Ensure opportunities for meaningful consultation with Native American groups in the identification and documentation of structures, sites, landscapes, artifacts, and documents. |
| CR-3.6 | **Tribal Resource Protection.** Develop policy and administrative procedure for the proactive protection of San Bernardino's tribal cultural resources, working with local Native American groups. |

There is potential for subsurface tribal resources to be present within the General Plan Update Area. Therefore, this impact is **potentially significant**.

**Significance without Mitigation:** Potentially Significant.

**Impact TCR-1a: Tribal cultural resources could be adversely impacted by grading activities associated with the General Plan Update.**

**Mitigation Measure**: Implement Mitigation Measure CUL-2.

**Significance with Mitigation:** Significant and unavoidable. While the General Plan Update includes policies intended to protect tribal cultural resources (see Table 3.18-1) and Mitigation Measure CUL-2 which establishes procedures for evaluation, documentation, and treatment of resources, development activities in the General Plan Update Area may still inadvertently disturb or damage tribal cultural resources and impacts would be **significant and unavoidable**.

## DOWNTOWN SPECIFIC PLAN

The Sacred Lands File search Conducted by the NAHC did indicate a positive result for the potential to encounter tribal cultural resources during ground disturbing activities. The DTSP is a regulatory document that sets forth the framework for future growth and development within the DTSP Area and does not directly result in development. The adoption of the DTSP would not lead to the demolition or material alteration of any tribal cultural resources. Nonetheless, there is potential for subsurface tribal resources to be present within the DTSP Area. Although there is low potential for the project's ground-disturbing activities to encounter tribal cultural resources, due to the extent of on-site ground disturbances from previous development and the area's urbanized nature, ground-disturbing activities, such as grading or excavation, associated with buildout facilitated by the DTSP Area, could have the potential to unearth undocumented subsurface tribal cultural resources. Therefore, impacts would be **potentially significant.**

**Impact TCR-1b: Tribal cultural resources could be adversely impacted by grading activities associated with the Downtown Specific Plan.**

**Significance without Mitigation:** Potentially Significant.

**Mitigation Measures**: Implement Mitigation Measure CUL-2.

**Significance with Mitigation:** Significant and unavoidable. While the General Plan Update includes policies intended to protect archaeological resources (see Table 3.18-1) and Mitigation Measure CUL-2 establishes procedures for evaluation, documentation, and treatment of resources, development activities in the DTSP Area may still inadvertently disturb or damage tribal cultural resources and impacts would be **significant and unavoidable**.

## 3.18.4 Cumulative Impact Analysis

The geographic scope for cumulative impacts on tribal cultural resources includes the General Plan Update Area which includes the DTSP Area. Full buildout under the General Plan Update and DTSP, in combination with other foreseeable development projects in the region, may result in cumulative ground disturbance across areas with the potential to contain significant tribal cultural resources.

**Would the project have a cumulative effect related to tribal cultural resources?**

Although the DTSP and General Plan Update are regulatory frameworks rather than development projects themselves, both facilitate substantial infill, redevelopment, and infrastructure improvement activities that involve grading and excavation. These activities could directly or indirectly affect tribal cultural resources—such as sacred sites, cultural landscapes, or locations of cultural value—that may not be visible or documented.

The Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) returned positive results for the General Plan Update Area, indicating that there is potential for undocumented tribal cultural resources to exist in both the DTSP and broader citywide area. As such, future cumulative development could disturb or degrade these resources if appropriate protective measures are not implemented.

The City has adopted General Plan policies that promote proactive tribal consultation and the protection of tribal cultural resources in partnership with local tribes. In addition, Mitigation Measure CUL-2 requires that any ground-disturbing activities that excavate previously undisturbed soils, a Sacred Lands File search must be completed, and focused tribal consultation may be required to evaluate and treat any tribal cultural resources appropriately. However, even with these mitigation measures and regulations, there is the potential for inadvertent discovery of tribal resources to occur.

**Impact TCR-2: The proposed project, together with cumulative projects, would have a substantial impact related to tribal cultural resources.**

**Mitigation Measures**: Implement Mitigation Measure CUL-2.

**Significance with Mitigation:** Significant and unavoidable. Although Mitigation Measure CUL-2 and applicable General Plan Update policies would be applied aimed to protect tribal resources, due to the scope and nature of the proposed project cumulative development poses a potential threat to tribal cultural resources. These measures allow for identification, evaluation, and treatment of tribal cultural resources in consultation with Native American tribes; however, it does not guarantee that inadvertent impacts would not occur. Therefore, cumulative impacts on tribal cultural resources would be **significant and unavoidable**.

## 3.18.5 References

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# 3.19 Utilities and Service Systems

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project" to impact utilities and service systems that serve the City of San Bernardino. Utilities and service systems include water supply and distribution systems; wastewater (sewage) conveyance and treatment; storm drainage systems; solid waste collection and disposal services; electricity and natural gas, and telecommunication services. Impacts to hydrology (e.g., flooding) and water quality can be found in Section 3.10, *Hydrology and Water Quality*. The regulatory framework and existing conditions for electricity and natural gas facilities can be found in Section 3.6, *Energy*.

The analysis in this section is based in part on the following technical reports:

- City of San Bernardino General Plan Update Infrastructure Report for Water, Sewer, Storm Drainage, and Water Quality, Fuscoe Engineering Inc., November 2025 (Appendix F-1).
- *City of San Bernardino Downtown Specific Plan Infrastructure Report for Water, Sewer, Storm Drainage, and Water Quality*, Fuscoe Engineering Inc., August 2022 (Appendix F-2).

Utility providers that serve the City are listed in Table 3.19-1*, Utility Providers*.

**Table 3.19-1 Utility Providers**

| Utility | Agency Name |
|---|---|
| Water | ▪ San Bernardino Municipal Water Department (**SBMWD**, retail supplier)<br>▪ East Valley Water District (**EVWD**, retail supplier)<br>▪ San Bernardino Valley Municipal Water District (**SBVMWD**, wholesale provider)<br>▪ San Bernardino Valley Water Conservation District (**SBVWCD**, regulates groundwater recharge)<br>▪ Muscoy Mutual (water district in the City's SOI) |
| Wastewater Treatment | ▪ San Bernardino Municipal Water Department (**SBMWD**)<br>▪ East Valley Water District (**EVWD**) |
| Regional Flood Control | ▪ City of San Bernardino Public Works/Engineering Division<br>▪ San Bernardino County Flood Control District (**SBCFCD**) |
| Solid Waste Collection | ▪ Burrtec Waste Industries |
| Solid Waste Disposal (Landfills) | ▪ County of San Bernardino, Solid Waste Management Division |
| Electricity | ▪ Southern California Edison (**SCE**) |
| Natural Gas | ▪ Southern California Gas Company (**SoCalGas**) |

**Table 3.19-1 Utility Providers**

| Utility | Agency Name |
|---|---|
| Telecommunications | ▪ AT&T, Charter Communications, Frontier Communications, Time Warner Cable, Inland Empire Media Group |

## Terminology

- **AFY**: acre-feet per year (roughly 325,851 gallons)
- **BMPs**: best management practices
- **LID**: low impact development
- **MGD**: millions of gallons per day
- **MS4**: municipal separate storm sewer system
- **NPDES**: National Pollution Discharge Elimination System
- **SWPPP**: stormwater pollution prevention plan
- **SWQMP**: storm water quality management plan
- **UWMP**: urban water management plan

## 3.19.1 Regulatory Framework

### FEDERAL

#### Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since then. It authorizes the United States Environmental Protection Agency (EPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and human-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resources Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

#### America's Water Infrastructure Act of 2018

America's Water Infrastructure Act was signed into law on October 23, 2018 and authorizes federal funding for water infrastructure projects; expands water storage capabilities; assists local communities in complying with the Safe Drinking Water Act and Clean Water Act; reduces

flooding risks for rural, western, and coastal communities; and addresses significant water infrastructure needs in tribal communities (Barasso 2018). Additionally, the act requires that drinking water systems that serve more than 3,300 people develop or update risk assessments and emergency response plans, which must be certified by the EPA within a deadline specified by America's Water Infrastructure Act.

## Clean Water Act (CWA)/National Pollutant Discharge Elimination System (NPDES) Permits

The Clean Water Act (CWA) establishes regulations to control the discharge of pollutants into the waters of the United States and regulates water quality standards for surface waters. Under the CWA, the US Environmental Protection Agency (EPA) is authorized to set wastewater standards and runs the National Pollutant Discharge Elimination System (NPDES) permit program. Under the NPDES program, permits are required for all new developments that generate discharges that go directly into waters of the United States. The federal CWA, United States Code, Title 33, Sections 1251 et seq. requires wastewater treatment of all effluent before it is discharged into surface waters.

Categories of discharges covered under the NPDES permit regulations include point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable connections and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a wastewater (sewage) treatment plant.

Additionally, the NPDES permit regulates municipal and industrial discharges to surface water of the United States from their municipal separate storm water systems (MS4s). The MS4 permits are issued by the regional water quality control boards. The City of San Bernardino is regulated by the San Bernardino County MS4 Permit issued by the Santa Ana Regional Water Quality Control Board (RWQCB).

## Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

# STATE

## Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Section 13000 *et seq.*) is the basic water quality control law for California. Under this Act, the State Water Board has ultimate control over state water rights and water-quality policy. In California, the EPA has delegated authority to issue NPDES permits to the State Water Board. The nine RWQCBs carry out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan, or Basin Plan, that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water-quality conditions and problems. The City of San Bernardino is under the jurisdiction of the Santa Ana RWQCB (Region 8).

## SWRCB General Waste Discharge Requirements

In order to provide a statewide regulatory approach to address sanitary sewer overflows, the SWRCB adopted Statewide General Waste Discharge Requirements for sanitary sewer systems (Order No. 2006-0003- DWQ) in 2006. The Statewide General Waste Discharge Requirements were readopted in December 2022 (Order No. 2022-0103-DWQ).

The General Waste Discharge Requirements specify that all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length which collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California need to develop a sewer system management plan (SSMP). The SSMP evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities to maintain proper levels of service. It includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models. Provision 14 of Order 2006-003-DWQ requires the SSMP be updated every five years and shall include any significant program changes.

The Santa Ana RWQCB (Region 8) issues and enforces NPDES permits in the portion of San Bernardino County that includes the City of San Bernardino. NPDES permits allow the RWQCB to regulate where and how waste is disposed of, including the discharge volume and effluent limits of waste and the monitoring and reporting responsibilities of the discharge. The RWQCB is also charged with conducting inspections of permitted discharges and monitoring permit compliance.

## SWRCB General Construction Permit

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the newly reissued SWRCB Construction General Permit (Order WQ 2022-0057-DWQ). Under the terms of the permit, applicants must file Permit Registration Documents (PRD) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants must also demonstrate conformance with applicable best management practices (BMP) and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a sampling program to ensure compliance with water quality standards, and on-site collection of samples and inspection of BMPs during a qualifying precipitation event.

## SWRCB General Industrial Permit

The Statewide General permit for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ (2018) implements the federally required stormwater regulations in California for stormwater associated with industrial activities that discharge to Waters of the United States. This regulation covers facilities that are required by federal regulations or by the RWQCBs to obtain an NPDES permit. Dischargers are required to eliminate non-storm water discharges, develop SWPPPs that include BMPs, conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program

## SWRCB Trash Amendment

On April 7, 2015, the SWRCB adopted an amendment to "Water Quality Control Plan for Ocean Waters of California" to control trash. In addition, "Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California" added "Part 1, Trash Provisions." Together, they are collectively referred to as the "Trash Amendments." The Trash Amendments provide statewide consistency for the RWQCBs in their regulatory approach to protect aquatic life and public health beneficial uses, reduce environmental issues associated with trash in State waters, and focus limited resources on high-trash-generating areas (SWRCB 2015).

The Trash Amendments apply to all Phase I and II permittees under the NPDES MS4 permits. Compliance with the Trash Amendment requires municipalities to install certified trash

treatment control systems on all catch basins no later than December 2, 2030 (SWRCB 2025a). The Santa Ana RWQCB implements the statewide Trash Amendments through Water Code Section 13383 Orders that contain region-specific requirements.

## SWRCB Division of Drinking Water

The California Division of Drinking Water (DDW) regulates public water systems within California; oversees water recycling projects; permits water treatment devices; and supports and promotes water system security. The Division of Financial Assistance provides funding opportunities for drinking water system improvements; provides support for small water systems and for improving technical, managerial, and financial capacity; and certifies drinking water treatment and distribution operators. The Field Operations Branch of the Division of Drinking Water is responsible for the enforcement of the federal and California Safe Drinking Water Acts and the regulatory oversight of approximately 7,500 public water systems to ensure the delivery of safe drinking water to all Californians. In this capacity, Field Operations Branch staff perform field inspections, issue operating permits, review plans and specifications for new facilities, take enforcement actions for noncompliance with laws and regulations, review water quality monitoring results, and support and promote water system security. All public water systems in San Bernardino County are under the purview of the DDW.

## Sustainable Groundwater Management Act

The Sustainability Groundwater Management Act (SGMA) provides a framework for long-term sustainable groundwater management across California. Under the law local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP).

The City overlies the Bunker Hill Basin. The Bunker Hill Basin is exempt from the SGMA requirements because it is an adjudicated basin with an established physical solution and court oversight for sustainable management. This exemption means that the basin does not need to develop a separate GSP under SGMA, as sustainable management is governed by the court judgment and implemented through the Western-San Bernardino Watermaster. The court retains continuing jurisdiction to ensure beneficial use and avoid unreasonable groundwater use consistent with SGMA's sustainability goals, effectively fulfilling the state's groundwater sustainability objectives for this basin (DWR 2025a).

## Urban Water Management Planning Act

The California Urban Water Management Planning Act and Section 10610 et seq. of the Water Code require that all urban water suppliers in California that provide water to more than 3,000 customers or supply more than 3,000 acre-feet per year (AFY) to prepare and adopt an urban water management plan (UWMP) and update it every five years. The act is intended to support

efficient use of urban water supplies. The act requires the UWMP to compare water supply and demand over the next 20 years for normal years, single dry years, and multiple dry years and to determine current and potential recycled water uses. The UWMP also provides conservation measures to ensure the efficient use of water supplies and must include a water shortage contingency plan.

## Water Supply

State law requires coordination between local water supply and land use decisions and confirm that there is an adequate water supply for new development. Specific projects are required to prepare a water supply assessment (WSA). The WSA is composed of information regarding existing and forecast water demands as well as information pertaining to available water supplies for the new development. The following projects that are subject to the California Environmental Quality Act (CEQA) are required to prepare a WSA:

- Residential developments consisting of more than 500 dwelling units.
- Shopping center or business establishment employing more than 1,000 people or having more than 500,000 square feet of floor area.
- Commercial office building employing more than 1,000 people or having more than 250,000 square feet of floor space.
- Hotel or motel, or both, having more than 500 rooms.
- Industrial, manufacturing, or processing plant, or industrial park employing more than 1,000 people, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- Mixed-use project that includes one or more of the uses specified above.
- Project that would demand an amount of water equivalent to, or greater than, the amount of water required for 500 dwelling units.

SB 221 requires written verification that there is sufficient water supply available for new residential subdivisions that include over 500 dwelling units. The verification must be provided before commencement of construction for the project.

## Water Conservation Act of 2009 (Senate Bill X7 7)

State law mandates the reduction of per capita water use and agricultural water use throughout the State by 20 percent by 2020. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for State water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards. Demonstration of compliance with this regulation is a required component of each water provider's 2020 UWMP. The 2025 UWMPs will likely be prepared and approved in 2026.

## 2018 Water Conservation Legislation

In 2018, the California Legislature enacted two policy bills (SB 606 and Assembly Bill [AB] 1668) to establish long-term improvements in water conservation and drought planning to adapt to climate change and longer and more intense droughts in California (DWR 2025b). The framework applies to both urban and agricultural water use. The Department of Water Resources and the SWRCB will develop new standards for:

- Indoor residential water use
- Outdoor residential water use
- Commercial, industrial, and institutional water use for landscape irrigation with dedicated meters
- Water loss

Urban water suppliers are required to stay within annual water budgets based on their standards for their service areas, and to calculate and report their urban water use objectives in an annual water use report. The indoor residential water use standard was established with the passage of SB 1157 in 2022. As a result, the California Water Code defines a 47-gallon-per-person daily standard for indoor residential use beginning in 2025 and further decreases to 42 gallons by 2030.

The outdoor residential and commercial water use standards are established as landscape efficiency factors (LEF) and become progressively more efficient over time, with a LEF for residential and commercial account of 0.80 until 2035, at which time it decreases to 0.63 until 2040, and then establishes a LEF for residential outdoor accounts of 0.55 and a LEF for commercial outdoor accounts of 0.45 after 2040. The water loss standard is the maximum allowable “real” water loss measured in gallons per connection per day for each water purveyor’s service area. Real losses are defined as the volume of annual leakage from the water purveyor’s distribution system.

Collectively, the water use efficiency standards and local service area characteristics (such as population and landscape area) establish the Urban Water Use Objectives (UWUO) per urban retail water supplier that cannot be exceeded on an annual basis. Urban retail water suppliers are required to calculate and report their UWUOs alongside their actual usage in an annual report. The first reports were due to the SWRCB on January 1, 2024, and are required to be submitted every January 1 thereafter. The final proposed “Making Conservation a California Way of Life” regulation was adopted by the SWRCB on July 3, 2024, and became effective in January 1, 2025 (SWRCB 2025b).

The legislation also includes changes to UWMP preparation requirements. These changes include additional requirements for Water Shortage Contingency Plans (WSCP), expansion of dry

year supply reliability assessments to a five-year drought period, and establishment of annual drought risk assessment procedures and reporting.

## Recycled Water Regulations

Two State agencies have primary responsibility for regulating the application and use of recycled water: the California Department of Public Health and the SWRCB. Planning and implementing water recycling projects entail numerous interactions with these regulatory agencies prior to project approval. The California Department of Public Health establishes the statewide effluent bacteriological and treatment reliability standards for recycled water uses in CCR, Title 22, Division 4, Environmental Health. Title 22 establishes standards for each general type of use based on the potential for human contact with recycled water. The SWRCB is responsible for establishing and enforcing requirements for the application and use of recycled water. Permits are required from the SWRCB for a water recycling operation. As part of the permit application process, applicants are required to demonstrate that the proposed recycled water operation will not exceed the ground and surface water quality objectives in the basin management plan and that the operation is compliant with Title 22 requirements.

## California Health and Safety Code: California Safe Drinking Water Act

The California Health and Safety Code (HSC) address water issues primarily through the California Safe Drinking Water Act. The Act establishes a regulatory program enforced by the SWRCB to ensure the safety of public drinking water systems. The SWRCB adopts primary and secondary drinking water standards and the Office of Environmental Health Hazard Assessment (OEHHA) develops public health goals. Public water systems are required to test their water for contaminants and notify customers if standards are exceeded or certain notification levels are met. The California HSC also establishes accreditation procedures for environmental laboratories, programs to certify operators of water treatment plants and water distribution systems, and the Drinking Water State Revolving Fund to assist small water systems serving disadvantaged communities.

## California Water Code

The California Water Code states that the water resources of the State must be put to beneficial use and that waste or unreasonable use of water should be prevented. The code is divided into several sections that include provisions regarding water quality, formation of irrigation districts and water districts, safe drinking water, and water supply and infrastructure improvements. The California Water Code also addresses water shortage emergencies, drought planning, conservation mandates, potable water reuse. appropriation of water, and water rights.

## Mandatory Water Conservation

Following the declaration of a state of emergency due to drought conditions on July 15, 2014, the SWRCB adopted Resolution No. 2014-0038 for emergency regulation of statewide water

conservation efforts (SWRCB 2014). These regulations went into effect on August 1, 2014, to reduce outdoor urban water use and intended that all California households would voluntarily reduce their water consumption by 20 percent. Water companies with 3,000 or more service connections were required to report monthly water consumption to the SWRCB.

In January of 2022, following the Governor's proclamation of a drought state of emergency for all counties, the SWRCB adopted the prohibited wasteful water uses emergency regulations. These include the prohibition of the following wasteful water use practices: 1) the application of potable water to outdoor landscapes in a manner that causes excess runoff; 2) the washing of vehicles without an automatic shut-off nozzle; 3) the application of potable water to driveways and sidewalks; 4) the use of potable water in nonrecirculating ornamental fountains; and 5) the application of potable water to outdoor landscapes during and within 48 hours after at least 0.25 inch of rainfall. In June of 2022, additional emergency water conservation regulations were enacted prohibiting the irrigation of nonfunctional turf at commercial, industrial, and institutional accounts, and the implementation of conservation actions under Level 2 of urban water suppliers' WSCPs. As of June 5, 2024, the emergency regulations expired.

In October of 2023, AB 1572 was signed into law by the governor, prohibiting the irrigation of nonfunctional turf at commercial, industrial, and institutional sites (with exceptions for areas irrigated with recycled water or harvested rainwater). The irrigation prohibitions become effective in stages between 2027 and 2031, beginning with state and local government facilities. Under the law, urban water suppliers must adopt the same irrigation prohibitions into their local regulations.

## Principles Governing CEQA Analysis of Water Supply

In *Vineyard Area Citizens for Responsible Growth, Inc., v. City of Rancho Cordova* (February 1, 2007), the California Supreme Court articulated the following principles for analysis of future water supplies for projects subject to CEQA:

- To meet CEQA's informational purposes, the EIR must present sufficient facts to decision makers to evaluate the pros and cons of supplying the necessary amount of water to the project.
- CEQA analysis for large, multiphase projects must assume that all phases of the project will eventually be built, and the EIR must analyze, to the extent reasonably possible, the impacts of providing water to the entire project. Tiering cannot be used to defer water supply analysis until future phases of the project are built.
- CEQA analysis cannot rely on "paper water." The EIR must discuss why the identified water should reasonably be expected to be available. Future water supplies must be likely rather than speculative.
- When there is some uncertainty regarding future availability of water, an EIR should acknowledge the degree of uncertainty, include a discussion of possible alternative sources,

and identify the environmental impacts of such alternative sources. Where a full discussion still leaves some uncertainty about long-term water supply, mitigation measures for curtailing future development if intended sources become unavailable may become a part of the EIR's approach.

- The EIR does not need to show that water supplies are ensured, because such a degree of certainty would be "unworkable, as it would require water planning to far outpace land use planning." The requisite degree of certainty of a project's water supply varies with the stage of project approval. CEQA does not require large projects, at the early planning phase, to provide a high degree of certainty regarding long-term future water supplies.
- The EIR analysis may rely on existing urban water management plans if the project's demand was included in the water management plan's demand accounting.

The ultimate question under CEQA is not whether an EIR establishes a likely source of water, but whether it adequately addresses the reasonably foreseeable impacts of supplying water to the project.

## State Model Landscape Ordinance

The California Water Conservation in Landscaping Act, also known as the State Landscape Model Ordinance, was amended pursuant to Assembly Bill (AB) 2717 and AB 1881. AB 2717 required the Department of Water Resources (DWR) to adopt a model local water efficient landscape ordinance that each local agency may adopt and requires local agencies to adopt a water efficient landscape ordinance. AB 1881 required cities and counties to adopt landscape water conservation ordinances by January 31, 2010, or to adopt a different ordinance that was at least as effective in conserving water as the California Updated Model Water Efficient Landscape Ordinance (MWELO).

The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and to build resiliency for future droughts. The 2015 revisions to the MWELO increased water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture and by limiting the portion of landscapes that can be covered in turf. Each city and county is required to submit annual reports to DWR that document how the agency is achieving compliance with the State MWELO and how many projects were subject to the ordinance during the annual reporting period. MWELO went through a round of revisions in 2024 to reduce ambiguity and improve clarity of the requirements as well as reorganize the content to better adhere to the landscape design process. The 2024 revisions did not modify or add new requirements to MWELO.

The City of San Bernardino complies with the State's current MWELO and has implemented landscape development standards. Developers are required to submit landscape plans and complete water efficient landscape worksheets prepared by a certified landscape architect prior to the start of construction.

## California Green Building Standards Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations) to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the code, throughout the State of California. CALGreen established planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent. The building efficiency standards are enforced through the local building permit process.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. CALGreen is updated on a three-year cycle, and the 2025 CALGreen became effective January 1, 2026.

## California Plumbing Code

The latest version of the California Plumbing Code (24 CCR Part 5) was issued in 2025 and became effective as of January 1, 2026. It specifies technical standards for the design, materials, workmanship, and maintenance of plumbing systems. One of the purposes of the plumbing code is to prevent conflicting plumbing codes within local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems.

## California Integrated Waste Management Act

California's Integrated Waste Management Act of 1989 (AB 939) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity. In 2007, SB 1016 amended AB 939 to establish a per-capita disposal measurement system based on two factors: a jurisdiction's reported total disposal of solid waste divided by the jurisdiction's population. CalRecycle sets a per-capita disposal rate target for each jurisdiction. Each jurisdiction must submit an annual report to CalRecycle with an update of its progress in implementing diversion programs and its current per-capita disposal rate.

## California Short-Lived Climate Pollutants Act

SB 1383 focuses on the elimination of methane gas created by organic materials in landfills and set targets to achieve a 50 percent reduction in the statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. Organic waste makes up half of what Californians send to landfills. SB 1383 requires all businesses and residents to divert organic materials (including food waste, yard waste, and soiled paper products) from the landfill. The regulation took effect on January 1, 2022, and requires that organics collection service be provided to all residents and businesses. The collected organic waste must be recycled into new products, such as compost, mulch, biofuel, and electricity. Each city and county have an annual procurement target based on its population. Also, an edible food recovery program must be established by 2025 with the goal of recovering 20 percent of currently disposed edible food that would otherwise be sent to landfills to feed people in need. Mandated food donors and food recovery organizations and services must keep records of the amount and dates of food donations and acceptances.

## Mandatory Commercial and Multifamily Residential Recycling Requirements

AB 341 (Chapter 476) set a statewide solid waste diversion goal of 75 percent by 2020. AB 341, which was passed in 2011 and took effect July 1, 2012, mandates recycling for businesses producing four or more cubic yards of solid waste per week or multifamily residential dwellings of five or more units. Under AB 341, businesses and multifamily dwellings of five or more units in the proposed project must separate recyclables from trash and either subscribe to recycling services, self-haul their recyclables, or contract with a permitted private recycler.

## Mandatory Organics Recycling Act

AB 1826, which was enacted in 2014, mandates organic waste recycling for all businesses and multifamily dwellings with five or more units. Starting January 1, 2020, all generators of 2 cubic yards or more of garbage, recycling, and compost combined per week must recycle organic waste. Organic waste includes food scraps, food-soiled paper waste, yard trimmings, and landscape materials. Organic waste can be recycled through composting, mulching, and anaerobic digestion which produces renewable energy and fuel. In addition to recycling food scraps, donating surplus food to local food banks can be part of the AB 1826 compliance effort.

## California Solid Waste Reuse and Recycling Access Act

The California Solid Waste Reuse and Recycling Access Act requires development projects to set aside areas for collecting and loading recyclable materials. This act required CalRecycle to develop a model ordinance for adoption by any local agency to provide adequate areas for the collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt a model or an ordinance of their own that establishes standards, including space allocation, for the collection and loading of recyclable materials.

# REGIONAL

## San Bernardino County Regional MS4 Permit

The Santa Ana RWQCB regulates stormwater discharges through separate MS4 (permits for each of the three counties in the Santa Ana River watershed (Orange, Riverside, San Bernardino) since the 1990s. The City is currently subject to the requirements of the San Bernardino County MS4 Permit (Order No. R8-2010-0036, NPDES Permit No. CAS618036). The RWQCB is in the process of revising the MS4 permit to include Orange County, Riverside County, and San Bernardino County under one regional permit covering all counties and cities in the watershed (Santa Ana RWQCB 2025).

## San Bernardino County Flood Control District

The San Bernadino County Flood Control District (SBCFCD) is the regional drainage authority for San Bernardino County. The SBCFCD operates and maintains the county's extensive flood control facilities, including dams, conservation basins, channels, and storm drains. The SBCFCD issues encroachment permits for development within its facility or rights-of-way.

## San Bernardino County Hydrology Manual

The San Bernardino County Hydrology Manual, last updated in 2010, establishes the standardized methodology for calculating peak storm water runoff rates and volumes necessary for the design of flood control and drainage facilities maintained by SBCFCD. This manual provides instructions for determining design flows for various storm recurrence intervals (e.g., 25-, 50-, and 100-year events) to ensure that development projects adequately manage both on-site and off-site drainage impacts, prevent downstream erosion, maintain channel stability, and comply with state and federal regulations.

## San Bernardino County Storm Drain Master Plan

In 1982, the County of San Bernardino produced a Master Plan of Drainage which included the City of San Bernardino to manage the proper implementation of storm drain facilities, flood control facilities and drain inlets to safely protect people and property from flooding. Within the Master Plan of Drainage, there are more localized Comprehensive Storm Drain Plans covering specific areas. The City of San Bernardino falls within Comprehensive Storm Drain Plans # 3, #6 and #7. The DTSP Area is within Storm Drain Plan #7. The San Bernardino County Public Works Flood Control Planning Division is mainly responsible for long range advance planning and for coordinating flood control project development and funding with other agencies:

- Long Range Planning involves planning investigations and project studies; project prioritization; preparing annual capital improvement reports, special reports and studies; preparing and updating Master Plans of Drainage; documenting flooding events and damages; developing and processing funding agreements; preparing and tracking grant

applications; Aerial photos and Historic information archiving and updating District's maps, exhibits, and displays.

- The Division conducts meetings with City Engineers in the respective Flood Zones. The meetings are designed to familiarize the City Engineers with flood control projects in planning, development and construction phases. District budget studies are also discussed.
- The Federal Projects Section of the Division is responsible for coordinating the development of federally sponsored flood control projects with the U.S. Army Corps of Engineers. Some of the past federally sponsored projects in our County included the construction of the Seven Oaks Dam and the San Timoteo Creek Basins and Channel.
- The Division coordinates Water Spreading Activities with local water agencies that use District facilities to recharge underground aquifers.

The City of San Bernardino Public Works Department implements the Comprehensive Storm Drain Plan No. #3, No. #6 and No. #7 on behalf of the SBCFCD within the City boundaries for all city projects. As projects come online, the City collects development impact fees for drainage improvements consistent with the Comprehensive Storm Drain Plans.

## San Bernardino County Stormwater Program

The Technical Guidance Document for Water Quality Management Plans (WQMP) for the Region 8 area of San Bernardino County is the guidance document for the project's stormwater design in compliance with Santa Ana RWQCB requirements for Priority Projects or Transportation Projects. The MS4 permit requires that a preliminary project-specific WQMP be prepared early in the project development process and that a Final WQMP be submitted prior to the start of construction. A project-specific WQMP is required to address the following (Santa Ana RWQCB 2013):

- Develop site design measures using LID principles.
- Establish project-specific design capture volume and applicable hydrologic conditions of concern requirements.
- Evaluate feasibility of on-site LID BMPs.
- Maximum hydrologic source control, infiltration, and biotreatment BMPs.
- Select applicable source control BMPs.
- Address post-construction BMP maintenance requirements

As described below, this requirement under the MS4 Permit is implemented by the City under San Bernardino Municipal Code Section 8.80 which provides City-specific requirements for preparing a Storm Water Quality Management Plan (SWQMP) similar to the WQMPs under the MS4 Permit.

## Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan

The 2020 Upper Santa Ana River Watershed Integrated Regional Urban Water Management Plan (2020 IRUWMP) is the Urban Water Management Plan (UWMP) for the water management agencies in the Upper Santa Ana River Watershed. The UWMPs of the retail water suppliers for the City of San Bernardino, San Bernardino Municipal Water Department and East Valley Water District, are included as chapters within this document (SBVMWD 2021).

## Western-San Bernardino Judgement

In 1969, the California Superior Court provided a ruling that established the framework for managing and distributing water rights in the Santa Ana River Basin, specifically dividing water resources in the San Bernardino Basin Area, Colton Basin, and Riverside Basin, ensuring sustainable use and resolving historical conflicts between various water agencies. It created a system for managing groundwater and surface water, establishing watermaster roles, and setting rules for water quality and flood control, allowing for collaboration and development for over 50 years. It mandates that if certain agencies extract water beyond their "safe yield", they must provide imported water to replenish the basin.

## San Bernardino Countywide Integrated Waste Management Plan

The California Integrated Waste Management Act of 1989 (AB 939) requires each county to prepare and adopt a Countywide Integrated Waste Management Plan (CIWMP). The plan identifies solid waste facilities in San Bernardino County and describes the countywide plan for reaching the State-mandated 50 percent recycling goal. Waste reduction and disposal facilities in the county that require solid waste facility permits must conform to policies and siting criteria in the CIWMP. The CIWMP includes, by reference, source reduction and recycling elements, household hazardous waste elements, and non-disposal facility elements as well as a plan that describes countywide diversion programs and landfill disposal needs. The elements must be reviewed every five years and revised if necessary. The latest five-year review report for the CIWMP was submitted by San Bernardino County Solid Waste Management Division on April 2018. The latest CIWMP states that the County has five landfills that have the capacity to accept all solid waste from its customers for a period in excess of 15 years (San Bernardino County 2018).

In addition, each city, county, or regional agency must prepare an annual report for submittal to CalRecycle that summarizes its progress in reducing solid waste, as required by Public Resources Code Section 41821. Once every two or four years (depending on the compliance schedule), CalRecycle conducts its own jurisdictional review of the annual reports to determine if the jurisdiction has met the Integrated Waste Management Act goals.

# LOCAL

## San Bernardino Municipal Water Department and East Valley Water District Sewer Master Plans

The SBMWD and EVWD both completed their Sewer Master Plan (SMP) Updates in 2019. These SMPs were developed to better understand sewer system infrastructure integrity and demands and create a hydraulic computer model to assess the capacity of the water infrastructure to meet projected demands of future developments. The key objectives of the SMPs are to:

- Assess the condition of the sewer collection system and major facilities;
- Identify existing hydraulic deficiencies and pipeline problems;
- Project future demands; and
- Identify needed improvements to accommodate future growth, facilitate an orderly and planned expansion of the collection system to accommodate future development as well as correct existing system deficiencies.

## SBMWD Sewer System Management Plan

SBMWD's Sewer System Management Plan (SSMP) serves as the primary regulatory framework for the operation and maintenance of the City's sanitary sewer system, in compliance with the SWRCB Order No. 2022-0103-DWQ. The May 2024 SSMP update provides a comprehensive roadmap for the SBMWD to manage its wastewater collection system effectively, with the central goals of minimizing the frequency and severity of sanitary sewer overflows (SSOs) and protecting public health and the environment. Key elements of the plan include detailed procedures for system evaluation and capacity assurance, proactive maintenance and cleaning schedules, an overflow emergency response plan, and a fats, oils, and grease (FOG) control program. Furthermore, the SSMP outlines organizational structures, legal authorities, and financial strategies necessary to ensure long-term sustainability and reliability of the sewer infrastructure through continuous monitoring and biennial audits (SBMWD 2025).

## EVWD Sewer System Management Plan

EVWD's 2023 SSMP establishes the regulatory and operational framework for the management of the District's wastewater collection system in accordance with the SWRCB Order No. 2022-0103-DWQ. . The SSMP identifies EVWD's primary objectives as the control, mitigation, and maintenance of the public sewer system to minimize the occurrence of SSOs and protect public health and the environment. Key components of the plan include an organizational structure with designated legally responsible officials, a robust operations and maintenance program involving proactive cleaning of 80 percent of the system annually and CCTV inspections of 20 percent of the system annually, and a comprehensive spill emergency response plan. Additionally, the plan outlines the District's legal authority to enforce sewer ordinances, manage

fats, oils, and grease (FOG) through a coordinated program with the SBMWD, and implement a System Evaluation and Capacity Assurance Plan based on the 2019 SMP to address long-term infrastructure needs and hydraulic deficiencies. The SSMP also incorporates monitoring and performance indicators to evaluate program effectiveness and ensure continuous improvement through regular audits and public communication (EVWD 2023).

## NPDES Waste Discharge Requirements for Wastewater Treatment Plants

Wastewater from the City is treated at the City of San Bernardino Water Reclamation Plant and the Regional Tertiary Treatment Rapid Infiltration and Extraction Facility. NPDES Permit No. CA0004141 (Order No. R8-2003-0020) contains the waste discharge requirements for City of San Bernardino Water Reclamation Plant. NPDES Permit No. CA8000304 (Order No. R8-2006-0052) contains the waste discharge requirements for the Regional Tertiary Treatment Rapid Infiltration and Extraction Facility.

## Wastewater Reclamation Plant Master Plan

The SBMWD completed a Facilities Assessment and Master Plan for the City's Water Reclamation Plant in May of 2020. This plan serves as a roadmap for implementation of short-term and long-term projects at the Water Reclamation Plant over the 2020 to 2040 planning horizon. The plan provides an assessment of its current facilities in addition to plans for capital improvement projects during the planning horizon (SBMWD 2020).

## SBMWD and EVMD's Urban Water Management Plans

The 2020 SBMWD and EVWD UWMPs were developed as part of the Upper Santa Ana River Watershed IRUWMP which includes the UWMPs of other water agencies including City of Loma Linda, Redlands, Colton, Rialto, West Valley Water District, Yucaipa Valley Water District and Riverside Highland Water Company.

The UWMPs were created to identify and plan for water customers and demands within the region. The 2020 UWMPs requires analyses of management tools and options to maximize local resources and to minimize the need to import water from other regions. An analysis of total projected water use compared to water supply sources over the next 25 years in five-year increments was conducted. Water demand and supply information was compared for normal single dry year and multiple dry year scenarios. The 2025 UWMPs will likely be prepared and approved in the summer of 2026.

## SBMWD Facilities Master Plan

SBMWD's 2024 Water Master Plan serves as the Department's updated, systemwide planning document and provides a comprehensive evaluation of existing and future water system needs through 2040. The plan updates the hydraulic model using current Geographic Information System (GIS) data, field verified information, and calibrated operational data to assess

pressures, storage, pumping capacity, and fire-flow performance across all pressure zones. Within the 2024 update future demand projections were developed using the 2020 Integrated Regional Urban Water Management Plan, planned development information, and updated peaking factors. The Water Master Plan identifies system deficiencies under existing and projected conditions, evaluates pressure zone realignments, and recommends near-term and long-term capital improvements needed to maintain reliable service, meet fire-flow requirements, and support planned growth.

The previous version of this plan, adopted in 2015, is used for the analysis of impacts DTSP Area since this analysis was completed prior to the 2024 update of the plan.

## EVWD Water System Master Plan

EVWD's 2019 Water System Master Plan (WSMP) studies the agency's water supplies and demands and created a hydraulic computer model to assess the capacity of the water infrastructure to meet projected demands through 2040. The previous master plan was completed in 2014. The methodology for 2019 WSMP included a survey on the City's existing water supply, storage, and pumping facilities, which used staff interviews, water system atlas maps, historical production and billing data, planning and development information, land use information, aerial photography, and GIS information. Population projections were determined based on population growth and land use. Water duty factors were then utilized along with population projects to determine water demands for three planning scenarios. Three scenarios were modeled using InfoWater software to simulate various operating conditions and to determine whether the water distribution system required any changes to meet the future district conditions. Required changes represent system deficiencies, that account for pressure, fire flow, supply, and storage facilities. The three planning scenarios analyzed were existing, near-term, and buildout whereby, peak hour demand, average day demand, and maximum day demand were analyzed. Future conditions were determined using applicable land use criteria for the district's service area in each planning scenario through 2040. Finally, the computer model was prepared for the facilities required to serve new developments, and recommendations were made for each planning scenario (2020, 2025, and 2040).

## SBMWD and EVWD Development Impact Fees

Both SBMWD and EVWD levy connections fees that apply to all new users or existing users who significantly increase their usage of water and wastewater infrastructure. These fees are applied by land use type and are used to fund improvements for each agency's infrastructure.

## City of San Bernardino Storm Drain Design Policy

The City of San Bernardino's Storm Drain Design Policy provides storm drain design standards for all development projects. Specifically, the policy mandates that major drainage systems in developed areas must contain the 25-year storm frequency within the pipeline capacity, the 50-

year storm between the street curbs, and the 100-year storm within the street right-of-way, thereby mitigating the risk of structural flooding. Hydrologic calculations must adhere to the San Bernardino County Hydrology Manual and projects must be designed to contain post-development peak flows, potentially requiring the incorporation of detention basins to ensure that flows are adequately attenuated prior to discharge into the municipal system.

## City of San Bernardino Broadband Strategic Master Plan

The City of San Bernardino's Broadband Master Plan serves as a strategic framework to expand high-speed internet infrastructure and achieve universal digital equity for all residents and businesses within the City's jurisdiction (San Bernardino 2024). The Plan outlines a comprehensive roadmap for the deployment of a robust fiber-optic backbone and "last-mile" connections, prioritizing underserved neighborhoods and municipal facilities to bridge the existing digital divide. Key objectives include enhancing economic competitiveness, supporting educational and telehealth initiatives, and improving public safety through resilient communication networks. The Plan also provides measures to ensure that the expansion of the telecommunications network aligns with the City's General Plan goals and complies with state and local land use, utility, and public service requirements.

## City of San Bernardino General Plan

The existing City of San Bernardino General Plan includes policies pertaining to utilities and service systems in the Utilities Element. These include policies encouraging compliance with existing regulations in addition to implementation of best management practices for reducing impacts of development projects.

## City of San Bernardino Municipal Code

City of San Bernardino Municipal Code (SBMC) includes the following provisions related to utilities and service systems:

- **Title 8, Chapter 8.24, Solid Waste Collection, Removal, Disposal, Processing and Recycling,** outlines the City's solid waste requirements, including solid waste disposal, approved waste containers, as well as the different methods for disposing of non-standard debris.
- **Title 8, Chapter 8.80, Stormwater Drainage System,** details the City's procedures to ensure the effectiveness of its stormwater drainage system. It identifies the types of discharges allowed in the sewer system and the types of discharge that are not allowed.
- **Title 13, Chapter 13.24, Water Supply System,** provides an overview of the City's regulations concerning the protection of underground water resources. This chapter also outlines their goals to provide safe water to the City's residents.
- **Title 13, Chapter 13.32, Wastewater Facilities,** identifies City and RWQCB regulations for wastewater discharge pursuant to the RWQCB's regulations.

- **Title 14, Chapter 14.04, Franchises – General Regulations,** provides general franchise regulations and requires certain providers to receive franchise agreements from the City for any telephone, electric light or power poles, wires or system.
- **Title 14, Chapter 14.08, Cable, Video and Telecommunications Service Providers,** provides the City's standards for franchising and designing telecommunications infrastructure.
- **Title 17, Chapter 17.06, Water Wise Landscape Program,** of the SBMC requires new development to submit and implement a water conservation plan to reduce water consumption in the landscape environment by using drought tolerant principles.

## 3.19.2 Existing Conditions

Unless otherwise noted, the following existing conditions information is from Appendices 3.19-1 and 3.19-2

### WASTEWATER

The sewer system throughout the General Plan Area and DTSP Area is managed by the SBMWD and the EVWD. SBMWD serves the western two-thirds of the City of San Bernardino, including the entirety of the DTSP Area, with EVWD serving the eastern third. All sewer systems in these service areas eventually lead to the City's Water Reclamation Plant (WRP) owned and operated by SBMWD. Recent construction of the EVWD's newly operational Sterling Natural Resource Center will also treat wastewater in the EVWD service area.

#### Citywide Area

##### *Sewer Infrastructure*

SBMWD's existing wastewater collection system consists of 493 miles of pipes ranging from 4 to 60 inches in diameter, 15 active lift stations, 12 siphons, approximately 38,085 sewer connections and 8,200 maintenance holes, and a WRP. The collection system is comprised primarily (approximately 96 percent) of vitrified clay pipe with the remainder of pipelines constructed of Acrylonitrile-Butadiene-Styrene, concrete, asbestos cement, ductile iron, Polyvinylchloride, Reinforced Concrete Pipe, and steel, among others.

EVWD's existing sewer system consists of approximately 213 miles of pipeline ranging in size from 4 to 24 inches in diameter, 4,400 sewer manholes, 7 siphons, and 5 diversion structures. The existing sewer system conveys flows into SBMWD's East Trunk Sewer that outlets to the WRP. The East Trunk Sewer is approximately 9 miles long ranging in size from 8 to 54 inches in diameter.

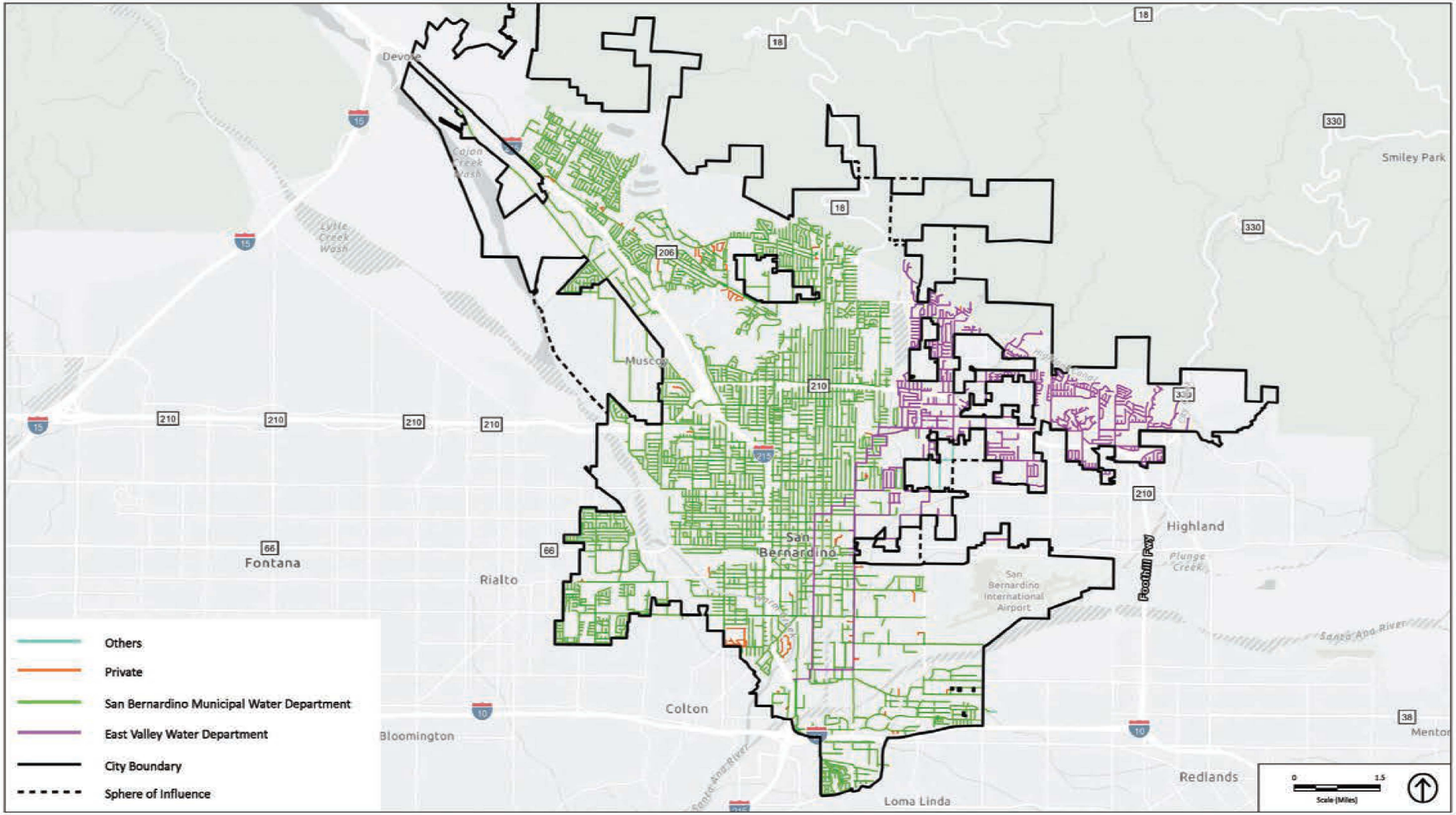
The existing sewer system network in City, including both SBMWD and EVWD facilities is shown in Figure 3.19-1, *Citywide Sewer Infrastructure.*

## *Wastewater Treatment*

All flows from the City ultimately discharge to the WRP, located at 399 Chandler Place in the City of San Bernardino. The WRP has been operated by SBMWD since 1973 and ensures all wastewater is properly treated prior to discharging into the Santa Ana River. The WRP is a Secondary Treatment facility that treats 33 million gallons per day (MGD) and serves a population of over 185,000 people in a service area that includes the City, the City of Loma Linda, EVWD, San Bernardino International Airport, Patton State Hospital, and areas of unincorporated San Bernardino County. After being treated at the WRP, and before discharging to the Santa Ana River, effluent is conveyed to the Rapid Infiltration and Extraction (RIX) facility, located at 1990 Agua Mansa Road in the City of Colton, for tertiary treatment. The RIX facility is jointly owned by SBMWD and the City of Colton but is operated solely by SBMWD. Approximately 61 percent or 12.86 MGD of the wastewater collected at the WRP was generated within the SBMWD service area in 2020. In 2020, the WRP treated 23,763 acre-feet (AF) of wastewater and discharged the same amount to the Santa Ana River.

According to the 2020 WRP Facilities Assessment and Master Plan, the sources of wastewater for the WRP include:

- SBMWD's service area comprising most of the City and some unincorporated areas in San Bernardino County, served by the three terminal lift stations (current average dry weather flow [ADWF] is approximately 13.4 MGD)
- EVWD's service area comprising the City of Highland and the remaining portions of the City of San Bernardino, served by the East Influent Lift Station (current ADWF is approximately 6.0 MGD)
- City of Loma Linda, served by the E Street Lift Station (current ADWF is approximately 2.1 MGD)
- Former headworks near the historic Valley Truck Farm east of Twin Creek (relatively low flow).




Source: Fuscoe 2025.

**Figure 3.19-1**
**Citywide Sewer Infrastructure**

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### *Sewer Capacity*

The SBMWD and EVWD 2019 SMPs evaluated their sewer capacities in dry and wet weather conditions based on full build out conditions of the existing 2005 General Plan and current zoning. At Year 2060, SBMWD projected 33.81 MGD of wastewater demand and EVWD projected 11.79 MGD of demand. The projected flows for EVWD also contain flows occurring from outside of the City in other portions of their service area. These values represent the ultimate future build-out for the service area based on the general plan and are a conservative estimate of the ultimate conditions in the sewer collection system. SBMWD's 2020 Facilities Assessment and Master Plan for the WRP identified a projected wastewater demand of 26.4 MGD at 2040, including the service areas of both SBMWD and EVWD.

To accommodate future development, the EVWD opened a wastewater reclamation facility in 2022 called the Sterling Natural Resource Center on 25318 5th Street in the City of San Bernardino, which became operational in January 2024. This facility can treat up to 8 MGD. Tertiary treated water from the facility is discharged into the local Bunker Hill Groundwater Basin to help supplement water supply against future droughts.

### *Sewer Demand*

A summary of existing sewer demand within the SBMWD and EVWD service areas is shown in Table 3.19-2, *Existing Citywide Sewer Demand*. As described in Appendix F-1, these calculations are based on the City's 2020 Census population in each service area within the City and the wastewater demand factors in the SBMWD Water Reclamation Plant Facilities Assessment and Master Plan.

**Table 3.19-2 Existing Citywide Sewer Demand**

| Sewer Provider | Service Area Population | Sewer Demand Factor per Capita (GPCD) | Total Sewer Demand (GPD) | Total Sewer Demand (AFY) |
|---|---|---|---|---|
| San Bernardino Municipal Water Department | 210,830 | 69 | 14,547,270 | 16,345.20 |
| East Valley Water District | 11,271 | 64 | 721,344 | 810.50 |
| **TOTAL** | | | **15,268,614** | **17,156** |

Source: Appendix F-1.

Note: GPCD = gallons per capita per day; AFY = acre-feet per year

## *Capital Improvement Plans*

Both the SBMWD and EVWD have their own wastewater system management and maintenance plans in place to upgrade any deficiencies to the sewer system within the City. The SBMWD Capital Improvement Plan (CIP) for 2021-2026 lists 46 projects, which are divided into replacement/rehabilitation projects as well as new system assets. A summary of major projects in the SBMWD and EVWD CIPs for 2021-2026 are detailed in Table 3.19-3, *Sewer System Capital Improvement Projects*.

**Table 3.19-3 Sewer System Capital Improvement Projects**

| Project Name | Project Description |
|---|---|
| SBMWD – Annual R/R - Solids Handling Systems | This funding will address capital purchases related exclusively to the treatment and handling of the solids process stream. Examples include replacement pumps for the digesters, Digester gas system upgrades, Conveyor system upgrades. |
| SBMWD – E Street Lift Station Rehabilitation Project | The project involves bypassing the lift station to facilitate the installation of three new valves on the main discharge header. |
| SBMWD – Phase 2 – Tertiary Treatment System (Design) | Construction of a five (5) MGD tertiary treatment system to meet Title 22 standards (eliminates use of groundwater for plant utility) and reduce hydraulic loading. |
| EVWD – Additional Membrane Bioreactor | This project adds a fifth membrane bioreactor (MBR) train at the SNRC to improve operational flexibility, better handle fluctuating flows, and reduce membrane fouling. |
| EVWD – Goal to Establish SNRC Maintenance Support Services | Issue competitive contracts for preventative maintenance, corrective repairs, and emergency services. |
| EVWD – Goal to Establish Professional Regulatory Support Services Contract | Issue a contract with professional service providers to ensure compliance with regulations set forth by State Water Resources Control Board (SWRCB) and other agencies to address compliance and maintain regulatory adherence. |

Source: Appendix F-1.

## *Septic Service*

The General Plan Update Area has limited areas that rely on onsite wastewater treatment services. These include portions of the Verdemont area, Arrowhead Farms, Muscoy, and scattered areas throughout the community. These areas also have ongoing septic-sewer conversion projects, whereby septic systems are being replaced with direct access to City sewer lines.

## Downtown Area

The DTSP Area is serviced by SBMWD. The DTSP Area has approximately 19 miles (100,560 linear feet) of sewer pipes ranging from 6 inches to 36 inches in diameter. The DTSP area boundary and existing sewer facilities serving the area are shown in Figure 3.19-2, *Downtown Specific Plan Area Sewer Infrastructure*. According SBMWD's SMP, the DTSP Area has several pipes that need expedited replacement, pipes with small areas of degradation, and pipes that require additional inspection to determine quality of pipe. The sewer pipes along 5th Street, 7th Street, and H Street showed a capacity of 75 percent or more.

Existing sewer demand in the DTSP Area is shown in Table 3.19-4, *Existing Sewer Demand in the DTSP Area*, which is based on the existing residential units and densities and non-residential square footages in the DTSP Area. Water demand factors where derived from the 2015 Water Master Plan based on land categories converted to wastewater demand based on approved ratios in the SBMWD 2019 SMP.

There are no CIP projects in the SBMWD's 2021-2026 CIP in the DTSP Area.

**Table 3.19-4 Existing Sewer Demand in the DTSP Area**

| DTSP Land Use District | Residential Units | Non-Residential Square Feet | Existing Demand (MGD)[1,2] |
|---|---|---|---|
| North Residential | 776 | 1,146,787 | 0.209 |
| North Gateway | 173 | 392,335 | 0.041 |
| Freeway Commercial | 24 | 89,279 | 0.009 |
| Transit Neighborhood | 342 | 310,781 | 0.058 |
| Downtown Core | 0 | 1,219,479 | 0.061 |
| County Center | 0 | 551,547 | 0.028 |
| Parkview Campus | 0 | 25,983 | 0.001 |
| Railside | 0 | 71,595 | 0.004 |
| Transit Center | 0 | 32,663 | 0.002 |
| **TOTALS** | **1315** | **3,840,449** | **0.413** |

Source: Appendix F-2.

Notes: MGD = million gallons per day.

1 Non-residential demand is based on a weighted average for nonresidential square footage of 2,580 GPD/acre.

2 The approved sewer to water ratios include the following: 0.66 for the single-family residential units in the North Residential District, 0.64 for the remaining multi-family residential units, and 0.85 for any non-residential uses.

# WATER

The City is served by three retail water districts, SBMWD, EVWD, and Muscoy Mutual Water Company (MMWC). SBMWD serves a majority of the City, while EVWD serves approximately 20 percent of the City in the eastern end, in addition to the City of Highland and portions of the unincorporated San Bernardino County. MMWC serves the unincorporated community of Muscoy in the western most part of the City's SOI. The service areas of these water utilities are shown in Figure 3.19-3, *Water Service Areas*. These agencies are responsible for the inspection and construction management of their respective distribution lines as well as the planning, design and project management under their respective CIPs. As part of the CIP processes, these agencies monitor and manage their water distribution systems to protect water infrastructure and ensure water quality is protected.

The San Bernardino Valley Municipal Water District (SBVMWD) provides wholesale water service for SBMWD, EVWD, and MMWC. SBVMWD facilities include pipelines, pump stations, reservoirs, and canals that convey water to retail water districts within its service area. SBVMWD also develops and implements long-range water acquisition strategies along with other projects and programs. The existing water conveyance infrastructure in the City is shown in Figure 3.19-4, *Citywide Water System*.

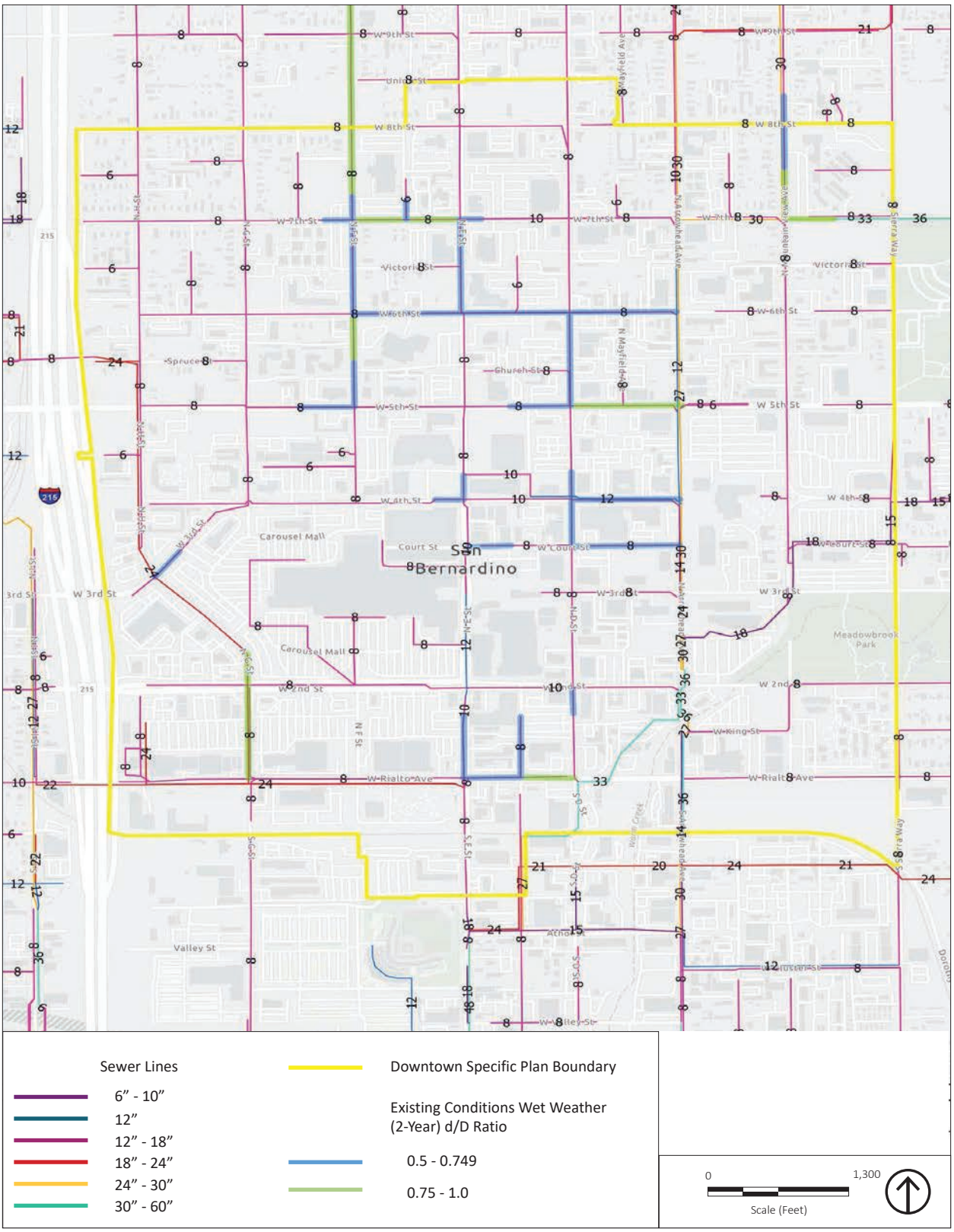
## Citywide Area

The SBMWD, EVWD, and MMWC are responsible for the management of the existing water systems within the General Plan Update Area. These districts manage potable water distribution systems throughout their separate service areas. SBVMWD serves as the regional wholesale water supplier with its own infrastructure.

### *Water Infrastructure*

#### ***San Bernardino Municipal Water District***

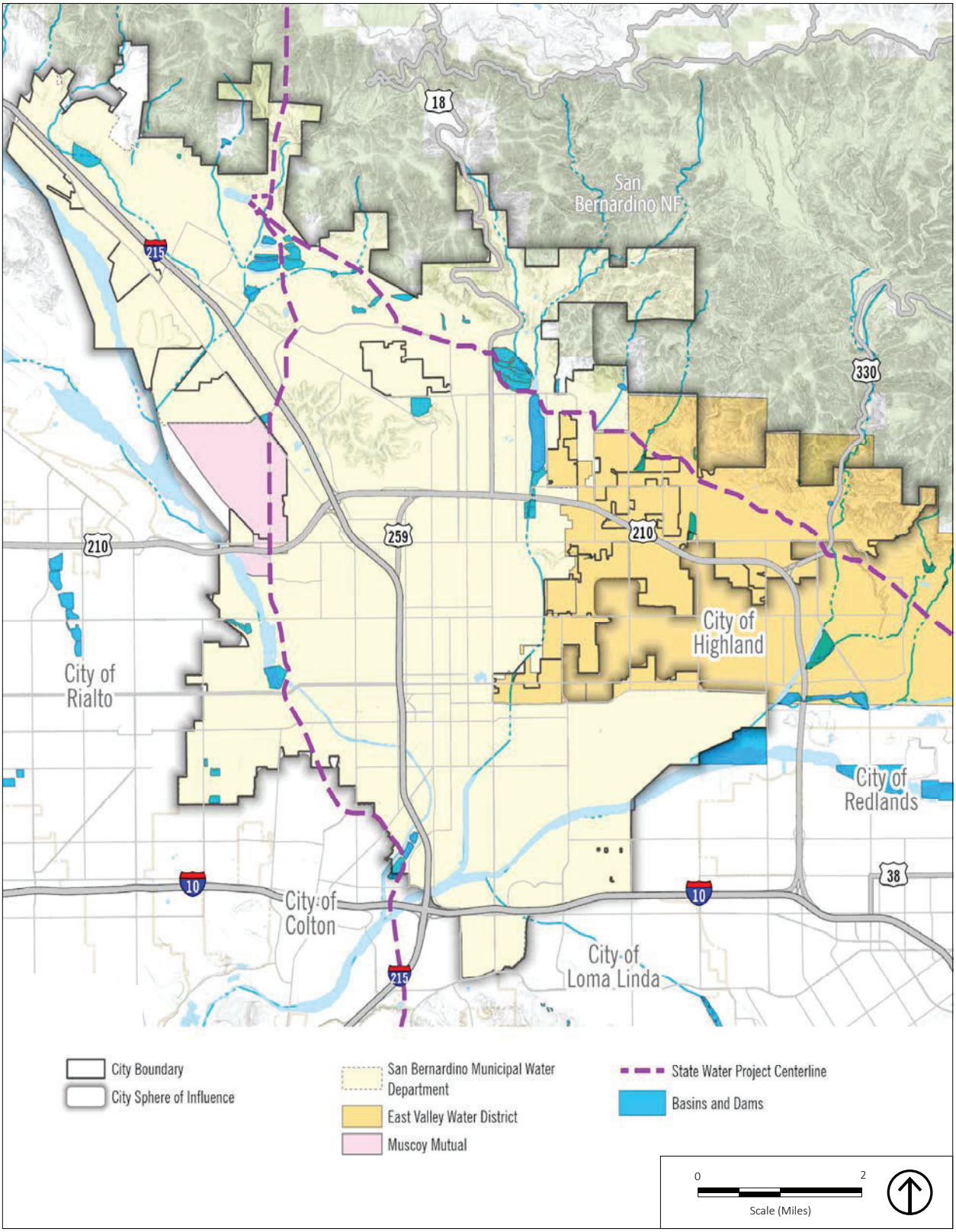
SBMWD's water distribution system consists of pipelines, storage reservoirs, pumping stations, hydroelectric generating stations, manual and automatic control valves, fire hydrants, and water meters located throughout the various individual pressure zones. SBMWD has 700 miles of pipeline varying in size from 2 inches to 78 inches in diameter, approximately 42,000 metered water services, 13,800 valves, and 4,000 fire hydrants. SBMWD has 44 water storage reservoirs containing a total of 112 million gallons of domestic water storage capacity. SBMWD relies solely on water extracted from the Bunker Hill Basin to meet its water demands. This water is distributed via SBMWD's water distribution system located throughout 19 individual pressure zones.




Source: Fuscoe 2022.

Figure 3.19-2
**Downtown Specific Plan Area Sewer Infrastructure**

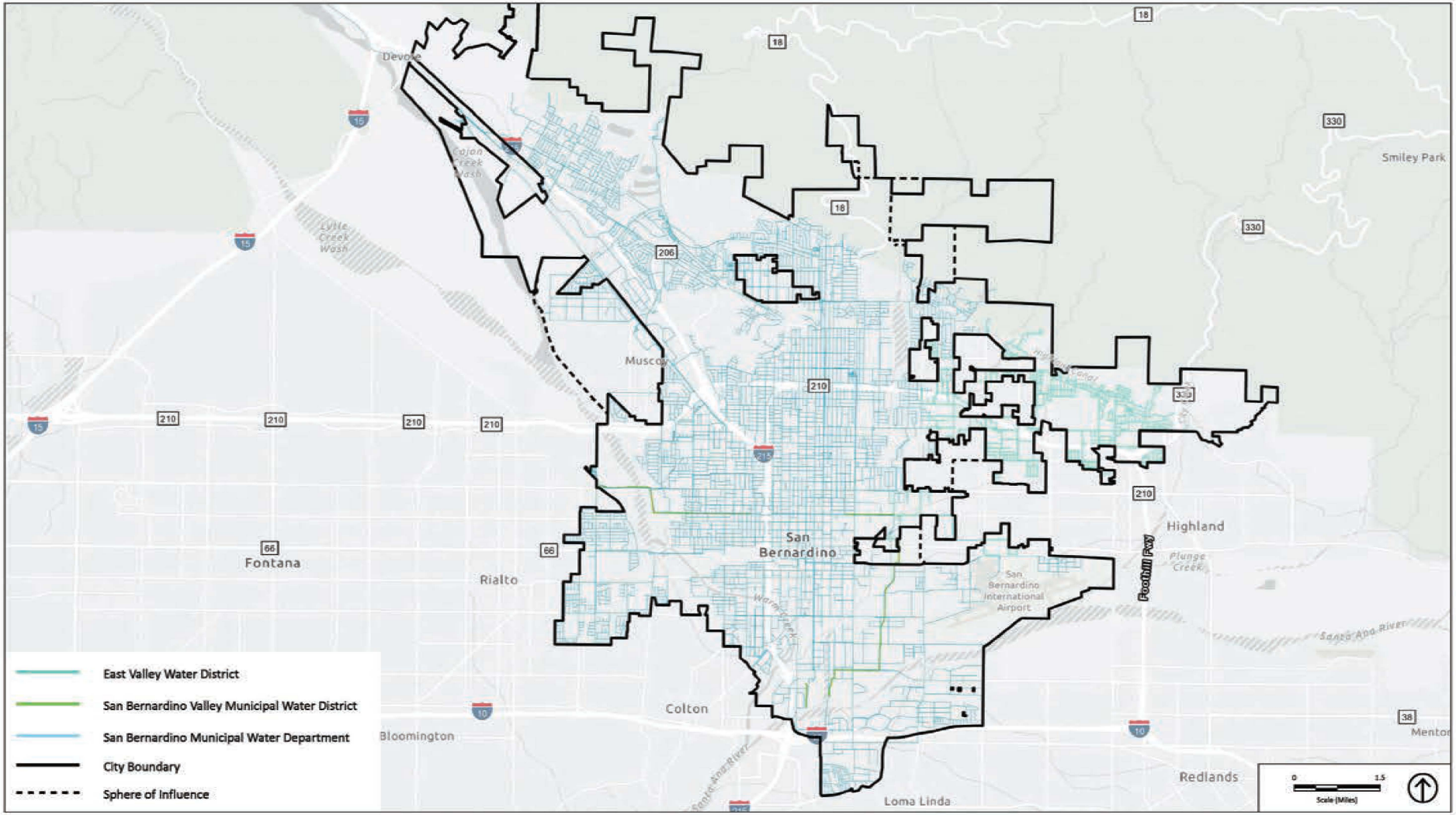
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Source: PlaceWorks, City of San Bernardino, 2026

Figure 3.19-3
**Water Service Areas**

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Source: Fuscoe 2025.

**Figure 3.19-4**
**Citywide Water System**

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### *East Valley Water District*

EVWD's water distribution system across its service area (including portions outside of the City) consists of pipelines, storage reservoirs, pumping stations, a surface water treatment plant, manual and automatic control valves, fire hydrants, and water meters located throughout the various individual pressure zones. EVWD's water system consists of 18 storage reservoirs, 31 booster pumping stations, 21 groundwater wells (active and inactive), 14 pressure reducing stations, and approximately 301 miles of pipeline. Water is distributed via EVWD's water distribution system located throughout six individual pressure zones.

### *San Bernardino Valley Municipal Water District*

SBVMWD, as the wholesale water district, has feeder lines that draw water from the State Water Project's California Aqueduct, which runs through the City. SBVMWD owns several recharge basins and feeder lines throughout the City. The feeder lines include the Baseline Feeder, South End Feeder, Central Feeder, Foothill Pipeline, Inland Feeder, and Etiwanda Pipeline.

### *Muscoy Mutual Water Company*

MMWC maintains approximately 1,500 connections in the unincorporated Muscoy community of the City's SOI. The water company's infrastructure includes five groundwater wells, two storage reservoirs, and miles of pipeline. MMWC also is rated with a maximum treatment capacity (SBCLAFCO 2017).

### *Recycled Water System*

Currently, no water districts serving the City use recycled water within their service areas or have any recycled water distribution lines. Wastewater is treated at the WRP to a secondary treatment level and is then conveyed to the RIX Tertiary Treatment Facility in the City of Colton. All treated effluent from the facility is discharged to the Santa Ana River. A portion of the discharged water, 16,000 AFY, is provided by contract to SBVMWD to maintain flows in the Santa Ana River fulfilling SBVMWD's downstream obligations. The remainder of the discharged amount is excess water, subject to potential reuse.

Due to the recent completion of the Sterling Natural Resources Center that has the capability to produce recycled water, EVWD is anticipated begin exploring the opportunities on implementing recycled water throughout its service area. Water from this facility is discharged into a series of recharge basins to percolate into the Bunker Hill Groundwater Basin. Additionally, SMBWD is currently constructing a recycled water project called the Clean Water Factory which will be a Title 22-compliance tertiary treatment facility that will supply recycled water.

### *Capital Improvement Plans*

Both SBMWD and EVWD manage their water CIP through structured, multi-year programs that identify and prioritize necessary water infrastructure projects. SBMWD has long-term master planning improvements and EVWD uses a rolling five-year CIP integrated into its strategic plan, both are updated annually and tracked within each agency's fiscal record. Table 3.10-5, *Water System Capital Improvement Projects*.

**Table 3.19-5 Water System Capital Improvement Projects**

| Project Name | Project Description |
|---|---|
| SBMWD – Annual Pipeline Replacement/Rehabilitation | Project involves the replacement of system wide problematic pipelines due to age, size, corrosion, and/or significant leak history. |
| SBMWD – 2300 Pressure Zone Infrastructure Improvement (Reservoir, Pump Station and Pipeline) | Project is the installation of a 1 million Gallon 2300 Pressure Zone tank, booster station and transmission pipeline. |
| SBMWD – Shandin Hills Booster Station Site Improvements | Project involves the design of site improvements at the existing Shandin Hills Booster Station. |
| EVWD – Tank/Reservoir Rehabilitation | The 2-million-gallon tank at Plant 140 is next in priority for rehabilitation according to a conditional assessment. |
| EVWD – Seismic Mitigation Main Replacement (Dwight/Sterling) | This project will replace approximately 34,700 linear feet of vulnerable mains in a 0.4 square mile project area bound by Pacific and Baseline Streets north and south, and Sterling Avenue and Dwight Way-east and west. |
| EVWD – Plant 134 Pretreatment Feasibility Study | This project will evaluate potential improvements to pre-treat raw water sourced from the Santa Ana River, prior to treatment at Plant 134. |

Source: Appendix F-1.

## *Water Supply*

The City overlies the Bunker Hill Basin and the San Bernardino Valley Water Conservation District (SBVWCD) ensures recharge of the Basin with sources of high-quality surface water, including imported and recycled water. SBVWCD seeks to improve the supply and quality of groundwater while protecting land resources as well as balancing ecosystem responsibilities with public access and aggregate resources uses.

100 percent of the water supply purchased by SBMWD is groundwater extracted from the Bunker Hill Basin by SBVMWD while EVWD's water supplies consist of 80 percent of groundwater it extracts from wells in its service area from the Bunker Hill Basin and 20 percent

of imported surface water from the State Water Project purchased from SBVMWD. MMWC operates five water wells in its service area that extract groundwater from the Bunker Hill Basin, and the water company also purchases water supplies from SBVMWD.

### *Water Supply and Demand Projections*

The SBMWD 2020 UWMP reported that the City's daily per capita water demand was 179 gallons per capita per day (GPCD) in 2020 while the 2020 Water Use Target GPCD was 203, thereby demonstrating the City met their respective goal. The UWMP also reported for 2020, total water usage was 42,182 AFY. The EVWD 2020 UWMP reported the agency's service area daily per capita water demand as 165 GPCD in 2020 while the 2020 Water Use Target GPCD was 172, thereby demonstrating the agency met their respective goal. The UWMP also reported for 2020, total water usage was 18,374 AFY.

According to the 2020 SBMWD UWMP, anticipated water demands will increase from 2025 through 2045 from 41,115 AF to 45,478 AF, respectively, and projected supply will increase over the same time frame from 48,585 AF to 53,603 AF. According to the 2020 EVWD UWMP, anticipated water demands will increase from 2025 through 2045 from 19,702 AF to 22,283 AF respectively and projected supply will increase over the same time frame from 22,657 AF to 25,625 AF. These districts anticipate meeting their demand primarily through additional pumping of the Bunker Hill Groundwater Basin within their allocated safe yield.

The SBMWD and EVWD UWMPs also report that the projected supply through 2045 during drought conditions (up to five multiple dry years) would be able to meet projected demand. The 2020 SBMWD UWMP reports that in year 2045 during multiple dry years, it would be able to supply a maximum of 58,963 AFY to meet a demand of 51,272 AFY, which accounts for a 10 percent increase in demand during the dry years. The 2020 EVWD UWMP reports that in year 2045 during multiple dry years, it would be able to supply a maximum of 28,188 AFY to meet a demand of 24,511 AFY, which accounts for a 10 percent increase in demand during the dry years. SBMWD and EVWD project residual supplies of 7,691 AFY and 3,677 AFY of water, respectively, during dry years by 2045.

MMWC does not meet the requirements for preparing a UWMP and did not prepare a UWMP as part of the 2020 Upper Santa Ana River IRUWMP. In the 2015 IRUWMP, MMWC projected a demand of 2,100 AFY for all periods from 2020 through 2045 and noted that it would be able to meet this demand with its extracted water supply (SBVMWD 2015).

### *Groundwater Sustainability*

Groundwater from the Bunker Hill Basin is a shared resource covered by the Western-San Bernardino Judgement which does not limit groundwater pumping by any agency within the SBVMWD service area. Each agency can pump as much water as they need to meet water demands. If total pumping by all agencies exceeds the safe yield set for the groundwater basin,

SBVMWD is responsible for replenishing the San Bernardino Basins. To do so, SBVMWD must import replenishment water from another source to offset the excess. The San Bernardino Watermaster maintains a cumulative accounting of the basin and tracks each agency's credits and debts for replenishment and extraction of water from the basin.

SBVMWD implements basin-replenishment programs, as described in the IRUWMP, the support long-term supply reliability throughout the San Bernardino Basin, including the Bunker Hill Basin. The projects include multiple recharge spreading basins, stormwater capture sites, and recycled water recharge pipelines designed to increase groundwater storage and reduce dependence on imported water. Altogether, these replenishment actions ensure that stakeholders including retail agencies such as SBMWD and EVWD draw from a basin that is actively managed for long-term sustainability.

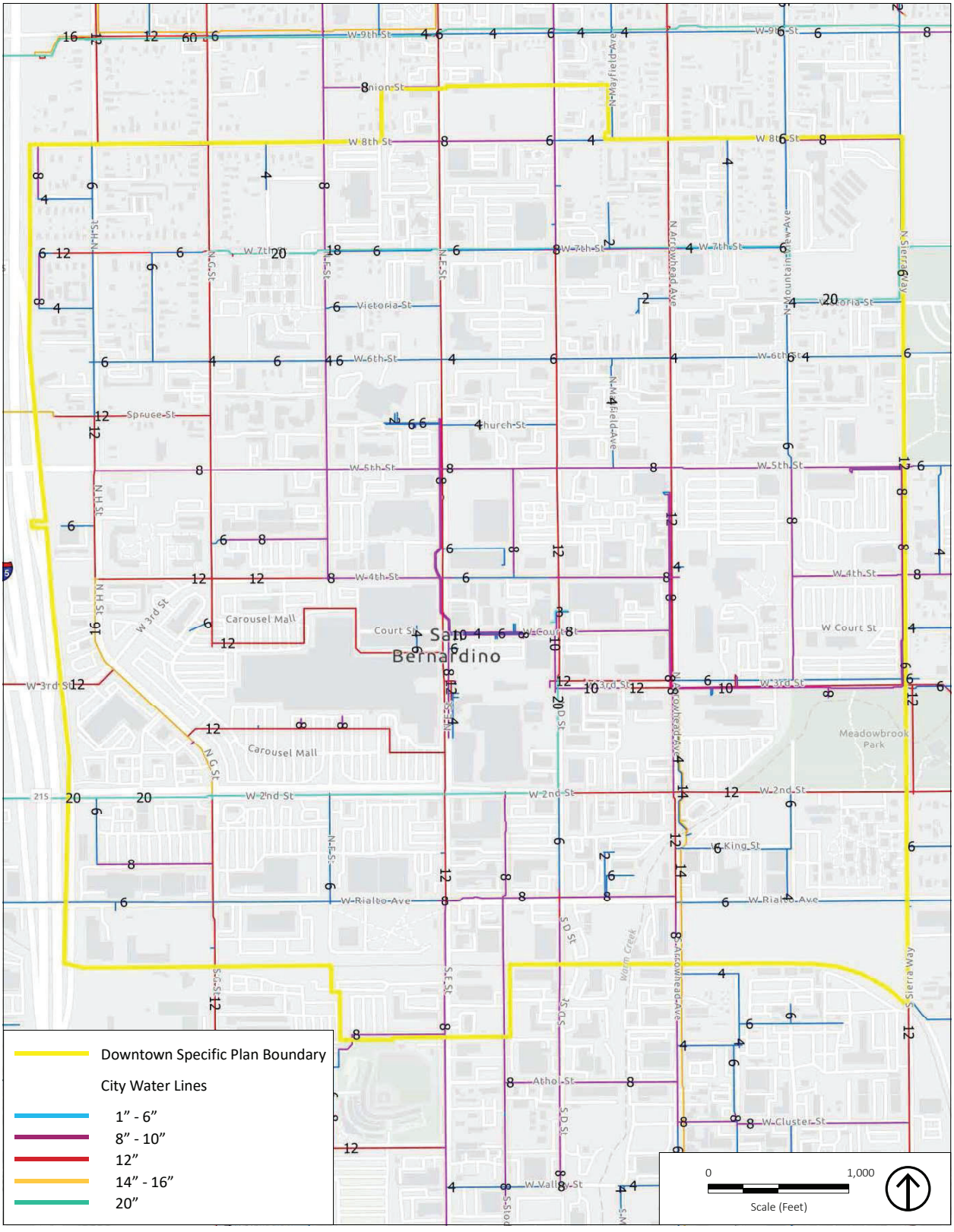
Recycled water from the Clean Water Factory and the Sterling Natural Resources Center facility are also anticipated to be used to recharge Bunker Hill Basin.

### *Water Demand*

SBMWD, which only serves customers in the City of San Bernardino and portions of its SOI, has a service area population of 210,830, as reported in its UWMP. The City had a 2020 population of 222,101 residents per the 2020 Census (see Appendix F-1). EVWD, which serves the remaining portions of the City, is therefore assumed to serve 11,271 residents in the City limits. As such, 5 percent of the City is assumed to be within EVWD's service area while the remaining 95 percent of the City is assumed to be served by SBMWD. However, the population served by EVWD is likely a larger share of the City since this calculation is based on the service area population of SBMWD which includes portions of the City's SOI. Based on these respective service populations of SBMWD and EVWD, the total existing water demand of the City is 44,437 AFY.

## Downtown Area

Under existing conditions, the DTSP Area is served by SBMWD-owned water lines located in the public streets, alleys, public parks, and parking lots. SBMWD is the sole water provider for the DTSP Area, as shown in Figure 3.19-5, *Downtown Specific Plan Area Water System*. There are approximately 22 miles (106,595 linear feet) of water pipes ranging from 6 inches to 36 inches in diameter. Per the 2024 Water Master Plan, DTSP Area falls entirely within the Lower Zone of the SBMWD service area. No water infrastructure deficiencies were identified in the DTSP Area within the 2024 Water Master Plan. No rehabilitation projects have been identified in the 2021-2026 CIP within the DTSP Area.




Source: Fuscoe 2022.

Figure 3.19-5
**Downtown Specific Plan Area Water System**

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Existing water demand in the DTSP Area is shown in Table 3.19-6, *Existing Water Demand in the DTSP Area,* based on existing residential units and densities and non-residential square footages. Water demand factors for each land use are based on 2015 Water Master Plan[1].

**Table 3.19-6 Existing Water Demand in the DTSP Area**

| DTSP Land Use District | Residential Units | Non-Residential Square Feet | Existing Demand (MGD)[1] |
|---|---|---|---|
| North Residential | 776 | 1,146,787 | 0.297 |
| North Gateway | 173 | 392,335 | 0.057 |
| Freeway Commercial | 24 | 89,279 | 0.012 |
| Transit Neighborhood | 342 | 310,781 | 0.085 |
| Downtown Core | 0 | 1,219,479 | 0.072 |
| County Center | 0 | 551,547 | 0.033 |
| County Mixed-Use Campus | 0 | 25,983 | 0.002 |
| Railside | 0 | 71,595 | 0.004 |
| Transit Center | 0 | 32,663 | 0.002 |
| **TOTALS** | 1,315 | 3,840,449 | 0.564 |

Source: Appendix F-2.

Notes: MGD = million gallons per day

1 Non-residential demand is based on a weighted average for nonresidential square footage of 2,580 GPD/acre.

## STORMWATER

The City's Public Works/Engineering Division is responsible for the inspection and construction management of City owned storm drains in addition to streets, sewers, construction projects, maintenance projects; planning, design and project management of the City's 5-year CIP; annexations and assessment districts. As part of the CIP process, the City monitors and manages the storm drain system to prevent against flooding and ensure water quality is protected.

In addition to City storm drain infrastructure, the SBCFCD maintains the regional storm drain conveyance systems including an extensive system of facilities, dams, conservation basins,

[1] SBMWD's Water Master Plan was updated in 2024, after the analysis for the DTSP was completed. This analysis is based on water demand factors included in the prior version of the Plan.

channels, and storm drains. The purpose of these facilities is to intercept and convey flood flows through and away from the major developed areas of the County. The primary functions of this infrastructure are flood protection on major streams, water conservation, and storm drain construction.

## Citywide Area

### *Stormwater Infrastructure*

City and SBCFCD storm drain facilities exist throughout the City. City storm drain lines range in diameter between 12 inches and 96 inches in diameter. There are several channels and creeks managed by SBCFCD throughout the City. Some of the major flood control facilities within the City include the Lytle Creek Channel, Warm Creek Channel, and the Santa Ana River. Existing stormwater drainage infrastructure is shown in Figure 3.10-1, *City and San Bernardino Flood Control District Existing Storm Drain Facilities,* in Section 3.10 of the DEIR.

### *Capital Improvement Plan*

City develops its Five-Year CIP consistent with the 2020-2025 Key Strategic Targets and Goals established by the Mayor and City Council. Major capital improvements can often be complex projects requiring several years of strategic planning, design, and funding before construction begins. New Developments are required to pay a fee based upon area for construction of storm drains. This fund is used for CIP Projects in the Storm Drain category of the CIP project list. Storm drain infrastructure improvements represent approximately 5 percent of the overall CIP funding.

The City's most current approved CIP budget includes approximately $15 million for the top priority drainage improvements including the Mt. Vernon storm drain, Sierra Way storm drain, Waterman/Baseline culvert, and storm drain catch basin screen installation for trash capture requirements. The SBCFCD's approved 2024/2025 CIP budget, and 2025/2026 CIP budget include $137 million for large-scale flood control improvements within the City limits including Cable Creek basin, City Creek bypass channel, Del Rosa Channel and North San Bernardino Channel.

## Downtown Area

The DTSP Area is primarily built-out with existing urban development. Stormwater runoff connects to a series of storm drain lines within DTSP Area which include both City and SBCFCD drainage facilities. Most of the smaller underground lines are under jurisdiction of the City and all the larger underground lines as well as flood control channels are maintained by SBCFCD including Town Creek and Warm Creek. Storm drain sizes range from 12 inches to 72 inches within DTSP Area. Figure 3.10-4, *Downtown Specific Plan Area Drainage Facilities,* in Section 3.10, shows the existing stormwater drainage infrastructure in the DTSP Area.

# SOLID WASTE

## Citywide Area

### *Collection Service*

Solid waste collection and disposal services in the City of San Bernardino are provided by Burrtec Waste Industries, a contractor to the City. Services provided by Burrtec include trash, recycling, and organic waste services; illegal dumping (only in the right-of-way); bulky item pickups; and street sweeping. Burrtec also operates transfer stations including the Aqua Mansa Materials Recycling Facility in the City of Riverside and the West Valley Materials Recycling Facility in the City of Fontana.

### *Landfills*

Non-recyclable waste generated by the City is disposed of at several facilities across California. These include: Azusa Land Reclamation Co. Landfill, Badlands Sanitary Landfill, Barstow Sanitary Landfill, Covanta Stanislaus, Inc., El Sobrante Landfill, Frank R. Bowerman Sanitary Landfill, Lamb Canyon Sanitary Landfill, Lancaster Landfill and Recycling Center, Landers Sanitary Landfill, Olinda Alpha Landfill, Prima Deshecha Landfill, Recology Hay Road, Salton City Solid Waste Site, Simi Valley Landfill & Recycling Center, Southeast Resource Recovery Facility, Victorville Sanitary Landfill, Mid-Valley Sanitary Landfill and San Timoteo Sanitary Landfill. However, Mid-Valley Sanitary Landfill accepted the majority of solid waste from the City, 83 percent, while El Sobrante Landfill accepted 9 percent and San Timoteo Sanitary Landfill accepted 5 percent. For the purposes of this analysis, all waste under the proposed project is assumed to be accepted by the Mid-Valley Sanitary Landfill (CalRecycle 2025a).

The Mid-Valley Sanitary Landfill is located at 2390 North Adler Avenue in the City of Rialto and operated by the County of San Bernardino Solid Waste Management Division. Mid-Valley Sanitary Landfill is a Class III landfill and accepts wood waste, tires, mixed municipal, inert, industrial, green materials, dead animals, contaminated soil, construction and demolition, and agricultural waste. The Landfill has a maximum daily permitted throughput of 7,500 tons; the Landfill's estimated cease date is April 2045 (CalRecycle 2025b). Table 3.19-7, *Mid-Valley Sanitary Landfill Characteristics,* summarizes the capacity and other relevant information of the Mid-Valley Sanitary Landfill.

**Table 3.19-7 Mid-Valley Sanitary Landfill Characteristics**

| | Mid-Valley Sanitary Landfill |
|---|---|
| Total waste received in 2019 (tons) | 1,134,106 |
| Total waste received from San Bernardino City in 2019 (tons) | 164,901 |
| Percentage of total waste from San Bernardino City | 15% |
| Maximum permitted throughput (TPD) | 7,500 |
| Average daily disposal rate in 2024 (TPD) | 4,221 |
| Excess daily capacity (TPD) | 3,279 |
| Remaining capacity (cubic yards) | 101,300,000 |
| Estimate closing date | 2045 |

Sources: CalRecycle 2025a, 2025b, 2025c, 2025d.
Note: TPD = tons per day

### *Solid Waste Diversion and Recycling*

Compliance with AB 939 is measured by comparing the CalRecycle target disposal rates for residents and employees to actual disposal rates. The 2024 target disposal rates for the City of San Bernardino were 6.6 pounds per day (PPD) for residents and 15.4 PPD for employees. Actual disposal rates in 2024 were 6.1 PPD for residents and 10.6 PPD for employees (CalRecycle 2025e). Therefore, solid waste diversion goals for the City for employment are in compliance with AB 939.

### Downtown Area

Solid waste in the DTSP Area is also collected by Burrtec and deposited primarily at the Mid-Valley Sanitary Landfill.

## OTHER UTILITIES

### Citywide Area

Energy infrastructure is discussed in Section 3.6 of this DEIR. Other dry utilities include telecommunications which is defined as communication through audio, video, and data from one point to another. Since telecommunications include voice, data, and image transmission, communication also includes telephones, fiber optics (data), and television among others.

According to the City's Broadband Master Plan, the City is well served with fiber optic technology and has access to broadband. Unserved areas are primarily at the northern periphery near the national forest. The City also has robust cell service coverage from major cell providers such as ATT, Verizon, and T-Mobile. The City is also in the process of entitling a new Valley Communications Center. The center will facilitate cross-agency collaboration between the Sheriff-Coroner, Office of Emergency Services, County Fire, Consolidated Fire Agencies, Inland Counties Emergency Medical Agency, Radio Management Facility, and Building Services. The facility will have a communications tower to support radio communication.

### Downtown Area

As the DTSP Area is primarily built-out, it contains existing dry utility connections and infrastructure throughout the Plan Area. It contains a mix of above and below-ground utility lines and a majority of the DTSP Area is served by broadband (CPUC 2025).

## 3.19.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G: Environmental Checklist Form** includes questions concerning utilities and service systems. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the Project would have a significant effect concerning utilities and service systems if it would:

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 that 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.

## METHODOLOGY

The following analysis is based in part on the information and analyses presented in the hydrology, water quality, and utilities technical reports prepared for the General Plan Update Area and DTSP Area (see Appendices 3.19-1 and 3.19-2). These reports include an assessment of the City's existing wastewater, water, and stormwater conveyance and treatment infrastructure, recommendations for addressing identified infrastructure deficiencies, calculations of the net increase in sewer and water generation under buildout of the proposed project, and a summary of existing regulatory procedures that reduce impacts to wastewater infrastructure. Because the proposed project would not result in buildout in the City's SOI, including MMWC's service area, impacts on this water provider are not analyzed in detail within this DEIR.

Analysis with respect to solid waste and dry utilities is based on the latest available information from CalRecycle (solid waste), the respective utility providers including Southern California Edison (SCE, electricity) and Southern California Gas Company (SoCalGas, natural gas), and the City's Broadband Strategic Master Plan. In determining the level of significance, the analysis assumes that future projects consistent with the proposed project would comply with applicable federal, state, and local laws, ordinances, and regulations.

# 3.19.4 Project Impact Analysis

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As the City and DTSP Area develop, new utility infrastructure would be required to meet demands. Impacts associated with the utility construction would primarily be confined to trenching for utility lines and connections to public infrastructure. The environmental impacts associated with all potential phases of individual project development under the General Plan Update are analyzed throughout this DEIR, to the extent possible at this programmatic level. Construction impacts would be relatively short-term duration and would cease to occur once the installation is complete. Construction activities would also be subject to various requirements that reduce environmental impacts. The operation of utility infrastructure would not result in any additional environmental impacts.

General Plan Update policies that would apply all to all utilities are shown in Table 3.19-8, *Utility Financing Proposed General Plan Update Policies*.

### Table 3.19-8 Utility Financing Proposed General Plan Update Policies

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-7.1 | **Infrastructure Plan**. Require all development proposals to have feasible plans for supplying the infrastructure and services to support the needs of their project in a timely manner, as determined by the City Engineer. |
| UI-7.2 | **Fair Share Costs**. Require developers to bear the cost of improving wastewater collection and treatment facilities; water supply transmission, distribution, storage, and treatment facilities; and storm drain and flood control facilities as necessitated by their proposed project. |
| UI-7.3 | **Adequacy of Fees**. Collect adequate fees and charges to fund the operation/maintenance of existing infrastructure and facilities and to construct new infrastructure and facilities as needed. |
| UI-7.4 | **Periodic Fee Review**. Review utility, capacity, and infrastructure fees as well as development, acquisition of service, and service charges to ensure that sufficient revenue is collected to fund the operation/maintenance of existing facilities and to construct new facilities. |
| UI-7.5 | **Public Infrastructure Support**. Provide public funding for the development, expansion, and/or upgrading of public utilities and infrastructure when improvements will provide substantial public benefit to the community. |
| UI-7.6 | **Assessment Districts**. Allow formation of community facilities districts and/or benefit assessment districts in which beneficiaries of infrastructure improvements pay a fair pro rata share of the costs of the improvements. |
| UI-7.7 | **Infrastructure Resiliency**. Ensure that the City's water, wastewater, storm drain, and energy infrastructure system is designed, improved, and upgraded as needed to mitigate damage from potential hazards. |
| UI-6.1 | **Project Development Approval**. Require that approval for new development, expansions, and reuses be contingent on the availability of adequate electricity, natural gas, and communications. |
| UI-6.2 | **Capacity Expansion**. Require improvements to the existing street light system, electricity or natural systems, or telecommunications necessitated by a new development proposal be funded by that development. |
| UI-6.3 | **Interagency Consultation**. Work with all public utilities providers to ensure that adequate electricity, natural gas, and communication facilities are available to meet the demands of the city, including new developments. |
| UI-6.4 | **Underground Utilities**. Require undergrounding of on-site utilities (e.g., gas, electricity, communications) and connections to facilities unless infeasible due to environmental, topography, or cost constraints. |

The following analysis provides additional details with respect to the capacity of existing and future infrastructure in the General Plan Update and DTSP Area for the individual utilities.

## Wastewater

Buildout of the proposed General Plan Update would result in an increase in wastewater generation. The total increase in sewer demand under the proposed General Plan Update is shown in Table 3.19-9, *General Plan Update Sewer Demand*.

**Table 3.19-9 General Plan Update Sewer Demand**

| Land Use | Water Demand (GPD)[1] | Return to Sewer Ratio[2] | Sewer Demand (GPD) | Sewer Demand (MGD) |
|---|---|---|---|---|
| Single Family | 2,241,060 | 0.66 | 1,479,099 | 1.48 |
| Multi-Family | 5,645,345 | 0.64 | 3,613,020 | 3.61 |
| Commercial, Office, Institutional | 1,911,211 | 0.85 | 1,624,529 | 1.62 |
| Industrial | 809,760 | 0.85 | 688,296 | 0.69 |
| **Total** | **10,607,377** | **-** | **7,404,946** | **7.4** |

Source: Appendix F-1.
Notes: GPD = gallons per day; MGD = millions of gallons per day.
[1] Water demand factors are from the SBMWD 2015 Water Master Plan
[2] Water to wastewater ratios are from the SBMWD 2019 Sewer Master Plan
Totals may not sum due to rounding.

General Plan Update policies that would reduce wastewater utility impacts are shown in Table 3.19-10, *Wastewater Proposed General Plan Update Policies*. These policies are referenced throughout the following analysis.

**Table 3.19-10 Wastewater Proposed General Plan Update Policies**

| **Utilities and Infrastructure Element** | |
|---|---|
| UI-1.1 | **Wastewater Infrastructure**. Provide wastewater collection and treatment facilities that are adequate to support development, meet usage and reclamation objectives, and maximize cost efficiency. |
| UI-1.2 | **Infrastructure Management**. Provide for the timely maintenance, renovation, replacement, and expansion of wastewater collection and treatment facilities to eliminate service deficiencies. |
| UI-1.3 | **Master Plan Evaluation**. Monitor flows and evaluate the City's Sewer and Wastewater Reclamation Master Plans to determine the collection and treatment facilities needed to serve present and future growth in the City. |
| UI-1.4 | **Wastewater Connection Requirement**. Prior to City approval of any new or substantially rehabilitated development project, the project must: |

**Table 3.19-10 Wastewater Proposed General Plan Update Policies**

| Utilities and Infrastructure Element | |
|---|---|
| | ▪ Connect to a master planned sanitary sewer system consistent with City "Sewer Policy and Procedures."<br>▪ Connect to interim facilities sufficient for present, short term needs only if permitted by the City; or<br>▪ Provide on-site wastewater treatment facilities that comply with the City and RWQCB requirements |
| UI-1.5 | **Industrial Pre-treatment**. Monitor businesses to prevent contaminated wastewater flow. Enforce industrial pre-treatment standards and source control to prevent materials prohibited by Federal and State regulations from entering the wastewater system. |
| UI-1.6 | **Wastewater Treatment Operations**. Operate the wastewater collection and treatment system in a manner that minimizes sewer overflows, complies with NPDES permit provisions, and minimizes infiltration. |

### *Sewer Infrastructure*

As projects are proposed and developed under the proposed General Plan Update, new sewer infrastructure and improvements to existing infrastructure would be required to maintain service levels. Various General Plan Update policies, as shown in Table 3.19-10, would require that wastewater collection infrastructure is provided for new development and that existing infrastructure throughout the City is maintained (see Policies UI-1.1 and UI-1.2).

SBMWD and EVWD maintain regularly updated Sewer Master Plans and CIPs which have processes to assess local sewer impacts on a project-by-project basis. The 2019 Sewer Master Plans will continue to serve as sewer infrastructure planning tools to make informed decisions about when CIP projects are warranted. Payment of sewer connection fees to SBMWD and EVWD for new development would also help to ensure that existing and future CIP projects are funded. Additionally General Plan Update Policy UI-1.3 would require that the City's sewer master plans are updated as future growth occurs. Policy UI-1.4 outlines the requirements for wastewater connections to new development and redevelopment.

Therefore, impacts from installation of new sewer infrastructure lines would be **less than significant.**

**Significance without Mitigation:** Less than significant.

### *Wastewater Treatment Capacity*

Wastewater flows are primarily deposited at the San Bernardino WRP and then conveyed to the RIX facility for tertiary treatment. Within the horizon of the General Plan Update, flows from the EVWD service area will also be conveyed to the newly operational Sterling Natural Resource Center for treatment.

As shown in Table 3.19-9, the General Plan Update buildout is anticipated to increase sewer flows by 7.4 MGD over existing conditions. SBMWD's 2020 Facilities Assessment and Master Plan for the WRP identified a projected wastewater demand of 26.4 MGD at full build out of the SBMWD and EVWD service areas, by 2040. The WRP has a treatment capacity of 33 MGD. The Sterling Natural Resources Center has a treatment capacity of 8 MGD. Therefore, these facilities have a combined capacity of 41 MGD.

Based on the projected net increase of approximately 7.4 MGD and the WRP's projected demand of 26.4 MGD (33.8 MGD combined projected sewer demand), which already includes buildout of the City under its existing General Plan, total flows would remain within the combined treatment capabilities of the regional system (i.e., 33.8 MGD projected sewer demand compared to the 41 MGD combined capacity) and would not require expansions of the existing facilities. SBMWD and EVWD will also continue to assess conditions and propose facility expansions and infrastructure investments in their respective CIPs which would be funded through usage and connection fees. General Plan Update Policy UI-1.6 would also ensure that the wastewater treatment plants comply with their wastewater discharge requirements while Policies UI-1.5 would help to enforce pre-treatment standards for industrial development.

Therefore, the impact on wastewater treatment infrastructure is **less than significant**.

**Significance without Mitigation:** Less than significant.

## Water

Buildout of the proposed General Plan Update would result in an increase in water demand. The total increase in water demand under the proposed General Plan Update is shown in Table 3.19-11, *General Plan Update Water Demand*.

### Table 3.19-11 General Plan Update Water Demand

| Land Use | DU/SF[1,2] | Acres | Water Duty Factor (GPD/ Acre)[3] | Proposed Water Demand (GPD) | Proposed Water Demand (AFY) |
|---|---|---|---|---|---|
| Single Family | 9,110 | 380 | 380 | 2,241,060 | 2,510 |
| Multi-Family | 25,033 | 808 | 808 | 5,645,345 | 6,324 |
| Commercial, Office, Institutional | 25,983,987 | 596.51 | 3,204 | 1,911,211 | 2,141 |
| Industrial | 15,184,374 | 348.58 | 2,323 | 809,760 | 907 |
| **Total** | **34,143 DU 41,168,362 SF** | -- | -- | **10,607,377** | **11,882** |

Source: Appendix F-1.

Notes:

DU = dwelling units, SF = square feet, GPD = gallons per day, AFY = acre-feet-per-year.

[1] Residential dwelling units were converted to acres using the maximum dwelling units per acre allowed under the Residential Medium (for single-family) and Residential High (for multi-family) designations under the proposed General Plan Update.

[2] Non-residential square footage was converted directly to acres.

[3] Water duty factors are from the 2015 SBMWD Water Master Plan.

General Plan Update policies that would reduce water utility impacts are shown in Table 3.19-12, *Water Proposed General Plan Update Policies*. These policies are referenced throughout the following analysis.

### Table 3.19-12 Water Proposed General Plan Update Policies

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-3.1 | **Water Supply.** The City shall continue to exercise and protect its adjudicated surface and ground water rights and entitlements in perpetuity and seek opportunities, if needed, to augment water supplies. |
| UI-3.2 | **Recharge Opportunities**. Work with the San Bernardino Valley Municipal Water District to expand water storage capacity through enhanced basin recharge and projects that divert recycled water to recharge basins. |
| UI-3.3 | **Groundwater Quality**. Require that development not degrade surface or groundwater, especially in areas with high groundwater tables or highly permeable soils; mitigate degradation that may have already occurred. |
| UI-3.4 | **Partnerships**. Continue to work with local and regional partners to ensure that a comprehensive and effective approach is undertaken to manage the region's water resources and achieve a resilient water supply. |

## Table 3.19-12 Water Proposed General Plan Update Policies

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-3.5 | **Drinking Water Quality**. Ensure that drinking water supplied to consumers in San Bernardino meets all local, state, and federal standards; monitor and test the City's water supply for emerging drinking water constituents. |
| UI-3.6 | **Water Conservation**. Continue to encourage water conservation through water demand management programs, public and private landscape requirements, building codes, rate structures, and public education. |
| UI-3.7 | **Recycled Water Use.** Explore and pursue opportunities, if cost effective, to expand recycled water use, such as:<br>▪ Groundwater basin replenishment<br>▪ Commercial and industrial processes<br>▪ Golf courses, landscaping, greenways, etc.<br>▪ Other uses that are safe and cost effective. |
| UI-3.3 | **Groundwater Quality**. Require that development not degrade surface or groundwater, especially in areas with high groundwater tables or highly permeable soils; mitigate degradation that may have already occurred. |
| UI-4.1 | **Water Infrastructure**. Provide water distribution, storage, and treatment facilities that are adequate to meet current demand, support the needs of future development, and maximize cost efficiency. |
| UI-4.2 | **Infrastructure Management**. Provide for the timely maintenance, renovation, replacement, and expansion of water supply, distribution, storage systems, and treatment facilities as necessary. |
| UI-4.3 | **Master Plan Evaluation.** Monitor the demands on the potable and non-potable water system and, as necessary, manage existing and new development to mitigate impacts and/or facilitate improvements. |
| UI-4.4 | **Infrastructure Timing**. Require adequate water supply, transmission, distribution, storage, and treatment facilities are in place prior to issuance of building permits or certificates of occupancy for new development. |
| UI-4.5 | **Sphere of Influence**. For development in the City's sphere of influence, request the County to disapprove any project that cannot be served with adequate public water distribution and treatment facilities. |
| UI-4.6 | **Water Hook-up Preference**. Require new water hook-ups, to comply with available domestic water supply; grant priority for service to proposed developments that include housing affordable to lower-income households. |
| UI-4.7 | **Emergency Water Supply**. Maintain adequate water supply during emergencies through intertie agreements with neighboring water agencies, backup generation at critical facilities, and other precautions that will ensure sufficient water supply is available during emergencies. |

Buildout of the General Plan Update would result in an increase in water demand of 11,882 AFY (10.6 MGD) over existing conditions. General Plan Update Policies UI-4.1, UI-4.2, UI-4.3, and UI-4.4 would require SBMWD and EVWD to ensure that water infrastructure is provided to meet the needs of existing and future development in the City. Therefore, implementation of the General Plan Update would require the construction of new water infrastructure where existing water lines are not sufficient to accommodate the increased demands. These determinations will be made on a project-by-project basis and include site specific fire flow tests and hydraulic pressure analyses. The proposed improvements may include upsizing water lines on-site and off-site and additions of boosters in low pressure areas.

To ensure long-term planning of water infrastructure, SBMWD and EVWD have developed Water Master Plans that evaluate hydraulic capacities, storage/supply facilities, fire flow requirements and pumping capabilities within their respective service areas. Each Water Master Plan evaluated their system based on existing conditions and full build out scenarios from the City's existing General Plan. Improvements identified in the Water Master Plans are implemented under SBMWD and EVWD CIPs. These agencies will continue to monitor and assess their infrastructure and construct improvements to ensure that growth under the General Plan Update has adequate water infrastructure.

Additionally, as part of the land development approval process, the SBMWD and EVWD determine a project's fair-share costs and levy connection fees. Through the use of connection fees and agreements, the SBMWD and EVWD can maintain and expand their water distribution systems, as necessary, pursuant to their CIPs. General Plan Update Policy UI-4.5 also directs the City to coordinate with San Bernardino County to ensure development in the City's SOI not able to be served by water distribution and treatment facilities is not approved. Policy UI-4.7 also directs the City to maintain adequate water supply during emergencies and ensure sufficient water supply is available during emergencies. Therefore, impacts related to infrastructure expansion and improvement caused by the implementation of the General Plan Update would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Stormwater

Future development pursuant to the proposed General Plan Update could result in an increase in impervious surfaces, which in turn could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause nuisance flooding in areas without adequate drainage facilities.

Development that connects to City or SBCFCD facilities is required to adhere to City and County standards to ensure these facilities are not impacted. For example, development would continue to adhere to the SBCFCD's Master Plans of Drainage which are implemented by the City of San Bernardino. Comprehensive Storm Drain Plans # 3, #6 and #7 cover the General Plan

Update Area and City staff continue to implement the plan as development and redevelopment projects trigger impacts or requirements drainage improvements. The City also follows its Storm Drain Design Policy, which establishes criteria and acceptable practices for storm drain design. This Policy directs the City to maintain all runoff within the underground storm drain system (except for street flow conveyance reaching collection points) for a 10-year storm frequency in all areas. Major drains (36 inches or larger) should maintain all runoff in the system for a 25-year storm event as the minimum criteria and 50-year and 100-year should be confined within the curb system and street right-of-way respectively.

Additionally, for redevelopment projects with existing impervious surfaces, the City requires applicants to evaluate the existing versus proposed hydrology conditions. The project will either be required to implement direct improvements or pay a development impact fee dependent upon the impacts and the recommended drainage facilities directly serving the project and the regional facilities serving the area. The fees are then put into funds restricted to the development of drainage facilities, and are part of CIP Capital Improvement Program to fund the local and regional improvements consistent with Comprehensive Storm Drain Plans. All projects are subject to this process, and the development of the vacant lots may require on-site detention systems to match existing peak flows.

The majority of runoff within the City's storm drain network discharges into fully improved concrete lined channels owned and operated by the SBCFCD. These channels are not susceptible to scour or erosion. However, some storms do discharge into more natural systems such as Cajon Creek Wash, Lytle Creek Wash and Twin Creek Levee. All discharges to natural systems are subject to the hydromodification requirements as part of the Santa Ana RWQCB MS4 Permit. Hydromodification requirements include various detention and/or retention controls to reduce the effects of increased peak flow and volumes associated with new or redevelopment projects.

In addition to these existing local regulatory requirements, proposed General Plan Update policies would reduce impacts to stormwater drainage infrastructure, as shown in Table 3.19-13, *Stormwater Proposed General Plan Update Policies*.

### Table 3.19-13 Stormwater Proposed General Plan Update Policies

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-2.1 | **Drainage Infrastructure.** Ensure that adequate storm drainage and flood control facilities are provided and regularly maintained in a timely manner to protect people and property from flooding hazards. |
| UI-2.2 | **Infrastructure Management.** Provide for the timely maintenance, renovation, replacement, and expansion of storm drain and flood control facilities to eliminate existing or future service deficiencies and protect property and development from flooding. |
| UI-2.3 | **Infrastructure Timing**. Require adequate storm drain and flood control facilities to be in place prior to the issuance of certificates of occupancy. Where infeasible, the Mayor and City Council may permit interim facilities to meet present and short-term future needs. |
| UI-2.4 | **Flood Control Project Design**. Design and implement flood control projects and improvements that maintain the integrity of riparian and other habitats, minimize disturbance of natural water bodies or drainage systems, and provide multiple benefits. |
| UI-2.5 | **Urban Runoff Reduction**. Implement a urban runoff reduction program that is consistent with regional and federal requirements, which includes requiring Best Management Practices (BMPs) and stormwater pollution prevention plans (SWPPPs) in qualified projects. |
| UI-2.6 | **Stormwater Infiltration**. Explore and consider opportunities for the use of stormwater retention and infiltration techniques (e.g., permeable pavements, landscaping, and so forth) that allow for the natural filtering of pollutants without sacrificing water quality. |
| **Safety Element** | |
| S-3.2 | **Flood Infrastructure Maintenance**. Coordinate with the San Bernardino County Flood Control District to maintain flood control systems and keep natural drainage courses free of obstructions. |
| S-3.3 | **Reducing Development Impact**. Require the use of green infrastructure and low impact development practices, as feasible, to mimic natural processes and absorb impacts from stormwater and flooding. |
| S-3.4 | **Storm Drain Requirement**. Coordinate with the County Planning Department for projects within the City's Sphere of Influence to disapprove development projects that do not have adequate storm drain systems. |
| S-3.5 | **Storm Drain Capacity**. Ensure that storm drains in developed areas comply with the County Flood Control Storm Drain Plans; design drains in foothills to convey 100-year flows where downstream systems are lacking. |

Compliance with the City and County policies and programs that require individual projects to reduce runoff into City and County stormwater infrastructure would ensure that implementation of proposed General Plan Update does exceed the capacity of existing or planned stormwater infrastructure. In addition, the City would continue to repair, rehabilitate, and upgrade the storm drain system through implementation of the CIP program, and potential future development would be required to pay storm drainage fees. While the proposed General

Plan Update would require the construction of new and expanded stormwater drainage infrastructure, these activities would comply with existing regulations to reduce environmental impacts.

Therefore, impacts with respect to stormwater infrastructure would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Other Utilities

General Plan Update policies that would reduce dry utility impacts are shown in Table 3.19-14, *Dry Utility Proposed General Plan Update Policies*. These policies are referenced throughout the following analysis.

**Table 3.19-14 Dry Utility Proposed General Plan Update Policies**

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-5.1 | **Public Facility and Infrastructure Energy Use**. As cost feasible, maximize energy efficiency without reducing public safety or service levels by incorporating proven energy advancements in City facilities and infrastructure:<br>▪ Street infrastructure such as lighting, signals, etc.<br>▪ Buildings and facilities, both interior and exterior.<br>▪ City fleet, public transit, and trains<br>▪ Water, sewer, and other infrastructure. |
| UI-5.2 | **Energy efficient building design**. Encourage and require, to the extent applicable, the incorporation of best practices in the design and operation of buildings. Examples include:<br>▪ Passive and active solar and wind design concepts.<br>▪ Cool roofs, green roofs, and rooftop gardens.<br>▪ Energy efficiency internal building components. |
| UI-5.3 | **Renewable Energy Systems in New Development**. Increase the installation of on-site renewable energy systems, battery storage, and micro-grids in projects encourage buildings to install such systems. |
| UI-5.4 | **Solar Energy.** Continue to support and facilitate the expansion of solar energy projects on residential units, nonresidential, and public facilities through incentives, development codes, and public education. |
| UI-5.5 | **Alternative Energy Generation**. Diversify the City's energy portfolio through the development of alternative energy technologies that include, but are not limited to:<br>▪ Methane recovery from landfills and fuel cells.<br>▪ Energy generation at wastewater treatment plants.<br>▪ Hydroelectricity from water infrastructure turnouts.<br>▪ Geothermal energy at City facilities where feasible. |

**Table 3.19-14 Dry Utility Proposed General Plan Update Policies**

| | |
|---|---|
| **Utilities and Infrastructure Element** | |
| UI-6.6 | **Communication Services**. Provide for the development of telecommunications systems, including cable, fiber optics, for entertainment, education, culture, information access, and similar purposes citywide. |

## *Electricity*

The proposed project is in SCE's service area, which spans which spans much of southern California from Orange and Riverside counties on the south to Santa Barbara County on the west to Mono County on the north. Total electricity consumption in SCE's service area was approximately 16.206 billion kilo-watt hours-hours (kWh) in 2024 (CEC 2025a). Electrical service to the City is provided by SCE through connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 3.6-4, *Year 2045 Forecast Electricity Consumption*, in Section 3.6, *Energy*, electricity use in the City under the proposed General Plan Update would increase by 533 GWh per year. The increase due to the proposed project is approximately 0.6 percent of the total electricity consumption for SCE in 2024 of 91,912 GWh.

All new development as a result of the proposed General Plan Update would be required to demonstrate compliance with the current Energy Code and CALGreen standards in effect at the time the individual development applications are submitted. Therefore, redevelopment under the proposed General Plan Update is likely to result in energy-efficient uses than the existing uses. This would result in reductions in electricity consumption per dwelling unit and per square foot when compared to existing development. General Plan Update Policies UI-5.1 and UI-5.2 would also help to reduce electricity use for new development in the City.

The total electricity consumption in SCE's service area is forecast to increase by approximately 23,200 GWh between 2022 and 2035 (CEC 2024). The proposed increase in electricity demand in the City would be within SCE's projected service area demand. Therefore, with respect to electricity supplies and infrastructure would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## *Natural Gas*

The SoCalGas provides natural gas to the City. SoCalGas' service area spans much of the southern half of California, from Imperial County on the southeast to San Luis Obispo County on the northwest, to part of Fresno County on the north, to Riverside County and most of San Bernardino County on the east (CEC 2022). Total natural gas consumption in SoCalGas's service area was approximately 547.2 million therms for 2024 (CEC 2025b).

Natural gas service to the City is provided by SoCalGas through connections to existing off-site natural gas pipelines and new on-site infrastructure. As shown in Table 3.6-5, *Year 2050 Forecast Natural Gas Consumption*, in Section 3.6, natural gas use in the City under the proposed General Plan Update would increase by 1,603,262 million BTU (MMBTU) per year. The increase is less than 0.1 percent of the total natural gas consumption for SoCalGas in 2024. General Plan Update Policies including Policies UI-5.3, UI-5.4, and UI-5.5 would encourage the use of renewable energy for new development. Adherence to Building Energy Efficiency Standards and CALGreen standards would also reduce natural gas use from future development.

SoCalGas forecasts that it will have sufficient supplies to meet demands in its service area (CGEU 2024). Adherence to energy efficiency regulations and General Plan Update policies is also anticipated to reduce use of natural gas supplies over the horizon of the proposed General Plan Update. Overall, buildout of the General Plan Update would not require SoCalGas to obtain increased natural gas supplies over its currently forecast supplies and impacts with respect to natural gas infrastructure and supplies would be **less than significant**.

**Significance without Mitigation:** Less than significant.

### *Telecommunications*

Infrastructure supporting telecommunications services associated with the proposed General Plan Update would be provided and installed in compliance with all State and local regulations. Furthermore, a number of franchised telecommunications providers are available in the region, including AT&T, Charter Communications, Frontier Communications, Time Warner Cable, and Verizon. No significant expansion or construction of the telecommunications network is anticipated as a result of implementation of the General Plan Update, though telecommunications will continue to update and expand as needed to meet their demand. Additionally, General Plan Update Policy UI-6.6 directs the City to expand telecommunications services in the City. Therefore, the proposed project would not require new or expanded telecommunication facilities, and impacts would **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

### Wastewater

Buildout of the DTSP Area would result in an increase in wastewater generation when compared to existing conditions, as shown in Table 3.19-15, *DTSP Increase in Sewer Demand*. The increase in development in the DTSP Area as a result of the DTSP would result in a net increase of 2.04 MGD in sewer demand.

**Table 3.19-15 DTSP Increase in Sewer Demand**

| DTSP Land Use District | New Residential Units | New Non-Residential Square Feet | Proposed Demand (MGD) |
|---|---|---|---|
| North Residential | 971 | 63,630 | 0.124 |
| North Gateway | 1,505 | 409,812 | 0.149 |
| Freeway Commercial | 0 | 191,649 | 0.035 |
| Transit Neighborhood | 5,872 | 3,288,686 | 0.713 |
| Downtown Core | 3,768 | 4,689,452 | 0.634 |
| County Center | 0 | 1,057,332 | 0.073 |
| Parkview Campus | 1,184 | 662,978 | 0.132 |
| Railside | 262 | 854,961 | 0.098 |
| Transit Center | 590 | 514,357 | 0.080 |
| **TOTALS** | **14,152** | **11,732,857** | **2.04** |

Source: Appendix F-2.

The estimated increase of 2.04 MGD in sewer flows under the DTSP is therefore not anticipated to exceed the current capacity of the WRP which has a treatment capacity of 33 MGD. As noted above, buildout under the General Plan Update, which includes buildout of the DTSP, would not exceed the capacity of the wastewater treatment plants that serve the City, which include the WRP in addition to the Sterling Natural Resource Center, which provides extra capacity.

As part of the SBMWD's 2019 Sewer Master Plan, hydraulic capacities and pipeline sizing ratios were evaluated for the entire city-wide sewer system under existing and full build out scenarios of the existing General Plan. Implementation of the DTSP land uses would result in a decrease in overall sewer flows by 24 percent as compared to the existing land uses in the DTSP Area (0.564 MGD) and would reduce impacts to existing sewer lines. For smaller lines ranging from 6 inches to 12 inches, re-development in the DTSP Area would likely result in the upsizing of these lines that ultimately connect to the larger trunklines in Rialto and North Arrowhead Ave. As individual projects are proposed, flow monitoring and potentially additional hydraulic modeling would be required to determine specific capacities and identify when lines require upsizing.

Improvements to sewer infrastructure in the DTSP Area would be identified in SBMWD's CIP and funded through existing development impact fees. Buildout of the DTSP would not significantly impact the hydraulic capacity of the overall sewer system based on the findings of the 2019

Sewer Master Plan. Therefore, the impacts from sewer and treatment systems adequacy to meet project requirements will be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Water

Buildout of the DTSP Area would result in an increase in water demand when compared to existing conditions, as shown in Table 3.19-16, *DTSP Increase in Water Demand*. The increase in development in the Downtown Area as a result of the DTSP would result in a net increase of 2.77 MGD of water demand.

**Table 3.19-16 DTSP Increase in Water Demand**

| DTSP Land Use District | New Residential Units | New Non-Residential Square Feet | Proposed Demand (MGD) |
|---|---|---|---|
| North Residential | 971 | 63,630 | 0.124 |
| North Gateway | 1,505 | 409,812 | 0.213 |
| Freeway Commercial | 0 | 191,649 | 0.042 |
| Transit Neighborhood | 5,872 | 3,288,686 | 0.991 |
| Downtown Core | 3,768 | 4,689,452 | 0.848 |
| County Center | 0 | 1,057,332 | 0.086 |
| Parkview Campus | 1,184 | 662,978 | 0.188 |
| Railside | 262 | 854,961 | 0.123 |
| Transit Center | 590 | 514,357 | 0.111 |
| **TOTALS** | **14,152** | **11,732,857** | **2.77** |

Source: Appendix F-2.

The SBMWD's 2015 Water Master Plan analyzed the full buildout of the City's existing General Plan and identified it would result in a total demand of 66.1 MGD or an increase of 28.4 MGD over existing conditions. In the DTSP Area, the existing General Plan allows up to 6,044 residential units and 51,338,737 square feet of non-residential uses. Using the same methodologies as calculating water demands for existing and proposed land uses, the full buildout of the existing General Plan for DTSP Area results in a total water demand of 4.1 MGD. The proposed DTSP land uses would result in an increase of 2.77 MGD over existing conditions.

Improvements to the DTSP's water system would continue to occur under the SBMWD's CIP process, pursuant to the direction in SBMWD's Water Master Plans to ensure that the distribution system is able to meet the water demands of new development. All development in the DTSP Area would be served by water infrastructure and the City has the discretion to require additional water hydraulic capacity studies associated with new and redevelopments. Payment of development fees by individual developments would help support infrastructure improvements required for the water system. Therefore, impacts associated with water infrastructure in the DTSP Area would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Stormwater

The DTSP Area is mostly built out with some vacant lots in the northwestern portions. Based on the current storm drain system, there are no major deficiencies, and no major flooding occurs during large storm events. Furthermore, according to the Flood Zone determination, the entire DTSP Area lies within Zone X which is designated as an area of minimal flood hazard. However, as with many older developed areas such as the Downtown, larger storm events can result in localized flooding. City and County requirements for stormwater drainage management discussed above for the General Plan Update would also apply to development under the DTSP. Therefore, impacts to the storm drainage system would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## Other Utilities

As discussed with respect to the General Plan Update, the City's electricity, natural gas, and telecommunications would be able to meet the demand of development within the General Plan Update Area, which includes the DTSP. The DTSP Area is primarily built out with existing development and would likely require minor upgrades to existing infrastructure at individual project sites as projects are proposed. Overall, impacts to dry utilities would be **less than significant**.

**Significance without Mitigation:** Less than significant.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The proposed General Plan Update would result in an increase of 11,882 AFY of water demand, as shown in Table 3.19-11. SBMWD and EVWD's 2020 UWMPs project residual supplies of 7,691 AFY and 3,677 AFY of water, respectively, during dry years at year 2045, which accounts for the agencies' projected demands for 2045 under drought conditions.[2] Therefore, the water demand under buildout of the General Plan Update would exceed SBMWD and EVWD's currently reported collective residual supply by 514 AFY.

Groundwater pumping from the Bunker Hill Basin is the primary source for water supply for both agencies. This Basin is adjudicated and managed by the Western-San Bernardino Watermaster under the Western-San Bernardino Judgement. Therefore, groundwater pumping by any agency within the SBVMWD service area is limited by a specific amount. Each agency can pump as much water as they need to meet water demands. If total pumping by all agencies exceeds the safe yield set for the Basin, SBVMWD is responsible for replenishing the Basin to offset its yield by procuring and importing water from other sources. SBMWD also implements basin-replenishment programs which are tracked in through the IRUWMP to ensure that levels in the Basin are maintained. Therefore, SBMWD and EVWD would be able to provide sufficient water supply for the proposed growth under the General Plan Update. Policies in the proposed General Plan Update would also encourage water conservation (Policy UI-3.6), use of recycled water (UI-3.7), and recharge of the Bunker Hill Basin (UI-3.2), in addition to ensuring that the City that the maintains adequate water supplies (UI-3.1). Additionally, the following regulations would also reduce water demand and ensure that adequate water supply exists before projects are approved:

- SB 606 and AB 1668 establish indoor water use standards (55 gallons per capita per day [GPCD] until 2025, 47 GPCD from 2025 to 2030, and 42 GPCD after 2030), outdoor water standards, and water loss standards that water suppliers must meet by 2028.
- New construction is subject to the latest CALGreen building code, which typically results in a 20 percent reduction in indoor water use.
- SB 407 requires all buildings in California to meet current plumbing fixture standards within this decade, which will require retrofitting of existing homes and businesses.

[2] It should be noted that the 2025 UWMPs will likely be prepared and approved in the summer of 2026.

- SB 610 and SB 221 requires projects to prepare a WSA that demonstrates that project water demands would not exceed water supplies.

SBMWD and EVWD's 2020 UWMPs state that there are sufficient water supplies through 2045 to meet projected demands in normal years, single dry years, and multiple dry years through 2045. Although the proposed General Plan Update at buildout in water demand that exceeds the UWMP's residual supply in 2045, SBMWD and EVWD would be able to obtain the necessary water supplies and future updates of the UWMPs would account for the demand projected by the General Plan Update. State requirements and General Plan Update policies would also result in increased water efficiency and conservation beyond what is anticipated under the General Plan Update's water demand projections. Therefore, there would be sufficient water supplies to meet the demand for the General Plan Update buildout. Therefore, impacts with respect to water supplies are **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

As described above, SBMWD's 2020 UWMP projected sufficient water supplies through 2045 to meet projected demands in normal, dry and multiple dry years. Implementation of the DTSP would result in an increase in water demand of 3,011 AFY (2.77 MGD). Demand in SBMWD's service area is anticipated to increase to 45,478 AFY by 2045. While the DTSP would add additional development within the SBMWD service area not anticipated within its 2020 UWMP, SBMWD would have additional water supplies available to meet additional demand through increased extraction of groundwater from the Bunker Hill Basin. Additionally, when applicable, project-level Water Supply Assessments would be required to ensure adequate supplies exist to support new development. Other water efficiency measures implemented on the project-level would further reduce water use from new development. Overall, impacts with respect to water supply would be **less than significant**.

**Significance without Mitigation:** Less than significant.

**c) Would the project result in a determination by the wastewater treatment provider that 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As described in Impact a), the General Plan Update would result in an increase in sewer generation (33.8 MGD) which that exceeds the current capacity of the WRP (33 MGD). In order to maintain sufficient capacity, EVWD constructed the Sterling Natural Resource Center which is a tertiary wastewater treatment plant facility capable of handling up to treatment of

wastewater up to 8 MGD. Diversion of up to 8 MGD to this new facility will allow the WRP to maintain sufficient capacity for all future projected flows. Through updating appropriate master plans, long-term capital improvement budgets, and plant capacity assessments, it is anticipated SBMWD and EVWD will be able to receive increases in flows consistent with the buildout proposed. Therefore, with respect to service provider capacities would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

See discussion of wastewater treatment impacts in Impact a). As described above, the wastewater treatment facilities that serve the City would have adequate capacity to treat the additional flows generated by the General Plan Update, which accounts for buildout of the DTSP. The increased flows from the DTSP would be within the existing capacity available at the City's WRP. SBMWD would continue to update its appropriate master plans, long-term CIP budgets, and plant capacity assessments, to be able to upgrade the capacity of its facilities to meet the demand of the proposed project. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**d) Would the project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

The General Plan Update would result in an increase in population of 63,624 residents and 60,500 employees (as provided in Table 2-4). This increase in population and employment would result in more solid waste generation and could impact the capacity of the receiving landfills. Table 3.19-17*, General Plan Update Solid Waste Generation*, provides an estimate of the amount of solid waste that would be generated under the proposed project.

**Table 3.19-17 General Plan Update Solid Waste Generation**

| | Residents | Employees |
|---|---|---|
| General Plan Update Increase in Residents and Employees | 63,624 | 60,500 |
| Per capita waste generation rate (PPD) | 6.1 | 10.6 |
| Waste Generation (PPD) | 388,106 | 641,300 |
| Waste Generation (TPY) | 70,829 | 117,037 |

Sources: CalRecycle 2025a, 2025b, 2025c, 2025d.
Note: PPD = pounds per day; TPY = tons per year

As shown in this table, buildout of the General Plan Update would generate an additional 70,829 tons per year (TPY) of solid waste from residents and 117,037 TPY from employees. This would result in a net increase of 187,866 TPY, which equates to a disposal rate of approximately 602 tons per day (TPD) (assuming 312 disposal days per year).

As provided in Table 3.19-7, the excess daily capacity of the Mid-Valley Sanitary Landfill, which accepts approximately 83 percent of the City's solid landfilled waste is 3,279 TPD. Therefore, this landfill can accommodate the additional 602 TPD from the proposed project. Additionally, approximately 17 percent of this waste would be distributed to other landfills that accept solid waste from the city. These calculations also conservatively assume no diversion of materials for recycling and composting.

General Plan Update policies that would reduce solid waste impacts are shown in Table 3.19-18, *Solid Waste Proposed General Plan Update Policies*. These policies are referenced throughout the following analysis.

**Table 3.19-18 Wastewater Proposed General Plan Update Policies**

| **Public Facilities and Services Element** | |
|---|---|
| PFS-5.1 | **Waste Management**. Continue to reduce the amount of municipal waste disposed and transferred to the landfill through recycling, source reduction, organics, and composting/green waste programs. |
| PFS-5.2 | **Street Sweeping**. Regularly maintain and clean streets to keep streets free of debris; reduce the amount of waste that contributes to urban runoff; and maintain clean residential, commercial, and industrial areas. |
| PFS-5.3 | **Community Cleanups**. Prioritize regular community cleanups, illegal dump cleanups, and other neighborhood- and citywide-based programs to reduce the volume of trash deposited in the community. |

**Table 3.19-18 Wastewater Proposed General Plan Update Policies**

| | |
|---|---|
| **Public Facilities and Services Element** | |
| PFS-5.4 | **Special Waste Programs**. Implement special waste management efforts to address special issues, such as e-waste, household hazardous waste, construction and demolition debris, oil and tire collection, and so forth. |
| PFS-5.5 | **Landfill Monitoring**. Continue to monitor and implement effective measures to address vapor intrusion, groundwater quality, and other impacts of legacy landfills and disposal practices in the community. |

Furthermore, future development pursuant to General Plan Update would comply with Section 4.408 of the 2022 CALGreen building code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Development would also comply with AB 341, which mandates recycling for commercial and multifamily residential land uses. Additionally, future businesses that generate organic waste in amounts over a certain threshold would be mandated to recycle organic matter in accordance with AB 1826. And policies in the proposed General Plan Update would also improve waste diversion from landfills (Policies PFS-5.1, PFS-5.2 and PFS-5.4) and landfill monitoring (PFS-5.5).

With continued compliance with the applicable regulations, leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed project would be **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

Development under the DTSP would result in 10,989 new employees and 35,618 residents in the DTSP Area (as provided in Table 2-9). Using the City's 2024 per capita disposal rates cited in Table 3.19-16, buildout of the DTSP would generate a total of 333,753 PPD of solid waste (or 60,910 TPY) and a disposal rate of 195 TPD. Therefore, similar to the buildout of the General Plan Update, the Mid-Valley Sanitary Landfill has adequate residual capacity to accommodate solid waste generated by the DTSP. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

**e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

## GENERAL PLAN, DEVELOPMENT CODE UPDATE AND DOWNTOWN SPECIFIC PLAN

As discussed above, the City complies with all State requirements to reduce the volume of solid waste through recycling and organic waste diversion. In addition, all potential future development pursuant to the proposed project would comply with Division 4.4, *Material Conservation and Resource Efficiency,* of the CALGreen Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Potential future development would also comply with AB 341, which mandates recycling for commercial and multifamily residential land uses as well as schools and school districts. All jurisdictions in California are required to provide organic waste collection services to all residents and businesses, in accordance with SB 1383.

The City currently complies with all applicable federal, State, and local solid waste regulations, and solid waste, recycling, and green waste collection services are available to all residents and commercial businesses. Therefore, the proposed project would comply with all current and future regulatory requirements, and impacts would be less than significant. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

# 3.19.5 Cumulative Impact Analysis

The area considered for cumulative impacts is the respective service areas of the utilities that serve the General Plan Update Area and DTSP Area.

**Would the project have a cumulative effect related to utilities and service systems?**

## Wastewater

The service area of SBMWD includes the City of San Bernardino and portions of its SOI and the EVWD service area includes a portion of the eastern end of the City in addition to the City of Highland and portions of the unincorporated San Bernardino County.

Growth within these service areas outside of the Citywide area would be accommodated by upgrades and expansion of the agencies' wastewater treatment and conveyance facilities, as documented in their Sewer Master Plans. Cumulative projects would be required to comply with all applicable regulations and requirements from SBMWD and EVWD. The cities that

discharge wastewater treatment plants serving the City of San Bernadino are required to prepare SSMPs to ensure that the sewer infrastructure and treatment facilities can handle the wastewater flows within their service area. Therefore, with continued compliance with local and regional regulations, cumulative impacts would be **less than significant** and impacts of the project would not be cumulatively considerable.

### Water

The SBMWD and EVWD's 2020 UWMPs state that there are sufficient water supplies through 2045 to meet projected demands in normal years, single dry years, and multiple dry years. Although the proposed project at buildout is estimated to generate an increase in water demand beyond the residual supply documented in the UWMPs, these agencies would be able to extract additional groundwater supplies to meet increased demand pursuant to the Western-San Bernardino Judgement. Additionally, State requirements for indoor water usage and City policies and code requirements would result in enhanced water efficiency and conservation efforts which would likely reduce the total water demand below the projections in the 2020 UWMP for year 2045. Overall, cumulative water demands would neither exceed planned levels of supply nor require building new water treatment facilities or expanding existing facilities beyond what is currently planned. In addition, future development would be required to pay connection fees, which would offset the costs of system maintenance and capital upgrades to support the new development in the service areas. Therefore, cumulative impacts would be **less than significant** and impacts of the project would not be cumulatively considerable.

### Storm Drainage

Other projects in the Upper Santa Ana River Watershed would increase impervious areas, thus increasing runoff and flows into the storm drain systems. Within San Bernardino County, other projects would also be required to prepare hydrology and hydraulic studies in accordance with the County Hydrology Manual and analyze stormwater flows that result from the 100-year storm event to ensure that the capacities of the storm drain systems are not exceeded. Additionally, future projects would be required to comply with the MS4 permits applicable to those watersheds. The Santa Ana RWQCB MS4 permit applies to portions of three counties in the Santa Ana Basin. Most projects would meet criteria in the MS4 permits that require LID measures and on-site stormwater bioretention facilities that would reduce the amount of runoff entering public storm drain systems. Cumulative impacts would be **less than significant** and would not be cumulatively considerable.

### Solid Waste

The Mid-Valley Sanitary Landfill has an excess daily capacity of 3,279 TPD and a remaining landfill capacity of 101,300,000 cubic yards. While this landfill is anticipated to close by 2045 at the horizon year of the proposed project, other landfills in the state have capacity to accommodate solid waste generated by the proposed project and other cumulative projects.

The latest update of the San Bernardino County CIWMP indicates that there is sufficient landfill capacity to meet the needs of the county for at least the next 15 years (San Bernardino County 2018). In addition, State and local regulations and ordinances regarding the recycling of construction debris and organic waste will further reduce the amount of solid waste transported to these landfills in the future. Therefore, with continued compliance with the applicable regulations, in combination with reasonably foreseeable future development, cumulative impacts would be **less than significant**, and project impacts would not be cumulatively considerable.

### Other Utilities

The area considered for cumulative impacts are the service areas of SCE for electricity and SoCalGas for natural gas. Other projects within the service areas would increase electricity and natural gas demands. The cumulative impacts of energy consumption and efficiency are provided in Section 3.6, *Energy*. All future projects developed within the SCE and SoCalGas service areas would implement the requirements of the California Energy Code and CALGreen Building Code. New buildings would also use new energy-efficient appliances and equipment, pursuant to the Appliance Efficiency Regulations. Counties and cities review project design plans against these codes and ensure compliance before issuing construction permits. These measures would reduce the overall consumption of electricity and natural gas.

The energy and telecommunications service providers that serve the proposed project indicate that they have the capability to serve future increases in population within their service areas without significant changes to the existing infrastructure. In addition, the proposed project includes goals, policies, and actions that would contribute to minimizing inefficient, wasteful, or unnecessary energy consumption and ensure compliance with State, regional, or local plans for renewable energy, therefore avoiding the need for new or expanded electric power and natural gas facilities which would significantly impact the service providers. Therefore, the proposed project would not result in a cumulatively considerable impact to electric power, natural gas, or telecommunication facilities and cumulative impacts would be **less than significant**.

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# 3.20 WILDFIRE

This section describes the wildfire-related impacts associated with the implementation of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan (DTSP), referred to together as the "proposed project". A summary of the relevant regulatory framework and existing conditions is followed by a discussion of the project-specific and cumulative impacts. The assessment of wildfire impacts is based on mapping and analyses conducted for the General Plan Safety Element, including the mapping of wildfire-prone areas and identification of evacuation-constrained residential parcels. This analysis uses the San Bernardino County Transit Authority's *Emergency Evacuation Network Resilience Study* (2025), to evaluate evacuation route capacity, safety, and viability and evacuation locations.

## 3.20.1 Regulatory Framework

### FEDERAL

#### National Cohesive Wildfire Management Strategy

In the Federal Land Assistance, Management, and Enhancement Act of 2009 (FLAME Act), Congress mandated the development of a National Cohesive Wildland Fire Management Strategy for all lands in the United States. Wildfire management is guided by the National Cohesive Wildland Fire Management Strategy, which has three primary goals—resilient landscapes, fire adapted communities, and safe and effective wildfire response (USDI and USDA 2014). These three goals enable land managers to manage vegetation and fuels; protect homes, communities, and other values at risk; manage human-caused ignitions; and effectively and efficiently respond to wildfires. California is part of the Western Regional Strategy Committee, chartered to support and facilitate the implementation of the National Cohesive Wildland Fire Strategy.

#### National Fire Protection Association Standards

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. NFPA standards are recommended (advisory) guidelines for fire protection that are referenced in the California Fire Code (CFC), which is adopted by the City of San Bernardino (City) every three years. Specific standards applicable to wildfire hazards include, but are not limited to:

- NFPA 1141, Fire Protection Infrastructure for Land Development in Wildlands
- NFPA 1142, Water Supplies for Suburban and Rural Fire Fighting
- NFPA 1143, Wildland Fire Management

- NFPA 1144, Reducing Structure Ignition Hazards from Wildland Fire
- NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations

## STATE

### California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's privately-owned wildlands. CAL FIRE provides fire assessment and firefighting services for land in State Responsibility Areas (SRA), responds to an average of 550,000 emergencies each year, conducts educational and training programs, provides fire planning guidance and mapping, and reviews general plan safety elements to ensure compliance with State fire safety requirements. CAL FIRE staff, or a designee, also reviews building permit applications, parcel maps, and use permits for construction or development in SRAs and Local Responsibility Areas (LRA).

The Board of Forestry and Fire Protection is a government-appointed approval body within CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of CAL FIRE, and representing the state's interest in federal forestland in California. The Board of Forestry and Fire Protection also promulgates regulations and approves general plan safety elements that are adopted by local governments for compliance with State statutes.

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. These responsibilities include regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention within wildland areas; regulating hazardous liquid pipelines; developing and renewing regulations and building standards; and providing training and education in fire protection methods and responsibilities. These are accomplished through major programs, including engineering, education, enforcement, and support from the Board of Forestry and Fire Protection. For jurisdictions in SRAs or Very High fire hazard severity zones (FHSZ), the Land Use Planning Program division of the Office of State Fire Marshal reviews safety elements during the update process to ensure consistency with California Government Code, Section 65302(g)(3). The Office of State Fire Marshal also reviews subdivisions of more than 30 dwelling units in SRAs or Very High FHSZs without secondary means on egress that are at significant fire risk, and provides recommendations to improve subdivision fire safety.

Together, the Board of Forestry and Fire Protection, Office of State Fire Marshal, and CAL FIRE protect and enhance the forest resources of all wildland areas of California that are not under federal jurisdiction.

### *Fire Hazard Severity Zones and Responsibility Areas*

CAL FIRE designates FHSZs as authorized under California Government Code Sections 51175 et seq. FHSZs may be designated Very High, High, or Moderate. CAL FIRE considers many factors when designating FHSZs, including fire history, existing and potential vegetation fuel, flame length, blowing embers, terrain, and weather patterns for the area. CAL FIRE designates FHSZs in two types of areas depending on which level of government is financially responsible for fire protection.

- **Local Responsibility Area.** Incorporated communities are financially responsible for wildfire protection.
- **State Responsibility Area.** CAL FIRE and contracted counties are financially responsible for wildfire protection.

### *CAL FIRE Strategic Plan 2024*

The CAL FIRE Strategic Plan 2024 contains goals and objectives to prepare for and mitigate the effects of fire on California's natural and built environments (CAL FIRE 2024a). The Strategic Plan 2024 focuses on strengthening the department's capabilities to provide effective fire prevention and suppression activities statewide to protect lives, property, and ecosystems. A key component of the Strategic Plan 2024 is the collaboration within the department to ensure fire suppression and natural resource management is successful (CAL FIRE 2024a).

## California's Wildfire and Forest Resilience Action Plan

The Governor's Forest Management Task Force developed California's Wildfire and Forest Resilience Action Plan, which is a framework for establishing healthy and resilient forests that can withstand and adapt to wildfire, drought, and climate change. The Wildfire and Forest Resilience Action Plan accelerates efforts to restore the health and resilience of California's forests, grasslands, and natural places; improves the fire safety of communities; and sustains the economic vitality of rural forested areas. CAL FIRE, in partnership with the United States Forest Service, intends to scale up forest thinning and prescribed fire; integrate climate adaptation into the statewide network of regional forest and community fire resilience plans; improve the electricity grid resilience, and promote sustainable land use.

## Very High Fire Hazard Severity Zone Fire Safe Regulations

California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7, Subchapter 2, Very High FHSZ Fire Safe Regulations, establishes minimum wildfire protection standards for construction and development in the Very High FHSZ and requires CAL FIRE to review development proposals and enact recommendations that serve as conditions of approval in these zones. These standards include basic emergency access and perimeter wildfire protection measures; signing

and building numbering; private water supply resources for emergency fire use; and vegetation modification. These regulations apply to all residential, commercial, and industrial buildings in the Very High FHSZs; the siting of new mobile homes; all tentative and parcel maps; and applications for building permits approved before 1991 when these standards were not proposed. Fire Safe Regulations also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road. Section 1273.08, Dead-End Roads, of these standards regulates the maximum lengths of single-access roadways:

- Parcels zoned for less than one acre: 800 feet
- Parcels zoned for 1 acre to 4.99 acres: 1,320 feet
- Parcels zoned for 5 acres to 19.99 acres: 2,640 feet
- Parcels zoned for 20 acres or larger: 5,280 feet

Section 1299.03, Fire Hazard Reduction Around Buildings and Structure Requirements, provides defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2). In Zone 1, all dead and dying plants must be removed, as must any flammable vegetation that could catch fire. In Zone 2, horizontal and vertical spacing among shrubs and trees must be created and maintained.

### *Fire Safe Regulations, Section 1299.02*

Fire Safe Regulations Section 1299.02 defines defensible space as the buffer landowners are required to create on their property between a "Building or Structure" and the plants, brush, and trees or other items surrounding the "Building or Structure" that could ignite in the event of a fire. A building or structure is defined as anything constructed that is designed or intended for support, enclosure, shelter, or protection of persons, animals, or property, having a permanent roof that is supported by walls or posts that connect to or rest on the ground.

## Public Resources Code Section 4291

Public Resources Code Section 4291, Mountainous, Forest-, Brush- and Grass-Covered Lands, is intended for any person who owns, leases, controls, operates, or maintains a building or structure in a mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material, regardless of whether the property is in an SRA or Very High FHSZ. This section requires defensible space to be maintained within 100 feet from each side of a structure. An ember-resistant zone is required within 5 feet of a structure, and more intense fuel reduction between 5 and 30 feet of a structure.

## California Government Code Section 51182

California Government Code Section 51182 works with Public Resources Code 4291, requiring a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in, upon, or adjoining a mountainous area, forest-covered land, shrub-covered land,

grass-covered land, or land that is covered with flammable material, within a Very High FHSZ to, at all times, maintain defensible space of 100 feet.

## California Building Standards Code

The California Buildings Standards Code (24 CCR) provides 12 different codes for construction and buildings in California. This code is updated every three years, with the most recent version effective January 1, 2026. The City of San Bernardino regularly adopts the most recent version of the California Building Standards Code, with modifications, into the San Bernardino Municipal Code, Title 15, Building and Construction.

### *Building Design Standards*

The California Building Code (CBC) (24 CCR Part 2) identifies building design standards, including those for fire safety. It is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions under specific amendment rules prescribed by the State Building Standards Commission. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC and any applicable local edits. Typical fire safety requirements of the CBC include the installation of sprinklers in buildings and other facilities; fire-resistance standards for fire doors, building materials, and particular types of construction in Very High FHSZs; requirements for smoke-detection systems; exiting requirements; and the clearance of debris.

### *Materials and Methods for Exterior Wildfire Exposure*

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in an FHSZ or Wildland Urban Interface area. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other requirements include vegetation management compliance, as prescribed in the California Fire Code Section 4906 and Public Resources Code 4291.

## California Fire Code

The CFC incorporates, by adoption, the International Fire Code of the International Code Council with California amendments. It is part of the building standards codes and is the official fire code for the State and all political subdivisions (24 CCR Part 9). Like the CBC, it is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. The 2025 CFC took effect on January 1, 2026. The CFC is a model code that regulates minimum fire safety regulations for new and existing buildings; facilities; storage; processes, including emergency planning and preparedness; fire service features; fire

protection systems; hazardous materials; fire flow requirements; and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

### *Fire Safety During Construction and Demolition*

Chapter 33 of the CFC, Fire Safety During Construction and Demolition, provides requirements for fire safety precautions during construction and demolition of a development project. The purpose of this chapter is to provide reasonable safety to life and property from fire during construction and demolition operations, including those in underground locations. Specific requirements include prohibiting smoking on-site, except for in approved areas; management of combustible materials and debris; cutting and welding; electrical wiring; and cooking. Additional requirements include the preparation of site safety plans prior to building permit issuance, providing fire watch during nonworking hours, and maintaining water supply for fire protection as soon as combustible materials arrive on a project site.

## California Wildland-Urban Interface Code

Under the 2025 update to California Building Standards Code, the California Wildland-Urban Interface Code (24 CCR Part 7) as was adopted as a standalone regulatory volume, with a majority of WUI-specific requirements previously being housed in the CFC (24 CCR Part 9). This code requires the implementation of "Home Hardening" standards for all new developments and significant redevelopments located within the SRA and LRA designated as High or Very High Fire Hazard Severity Zones. These standards mandate the use of ignition-resistant construction materials, including ember-resistant venting (specifically designed to prevent intrusion by wind-borne embers), non-combustible exterior cladding, and multi-paned tempered glazing.

This code also formalizes the "Zone 0" (Ember-Resistant Zone) requirement, which mandates a five-foot non-combustible perimeter around all structures, strictly prohibiting combustible mulch, woody vegetation, or accessory storage that could facilitate direct flame contact. The code also introduces expanded requirements for emergency access and infrastructure, requiring enhanced road widths, turnaround radius specifications for fire apparatus, and reflectorized signage to support rapid evacuation and fire suppression.

## California Public Utilities Commission

In 2007, wildfires in southern California were ignited by overhead utility power lines and aerial communication facilities near power lines. In response, the California Public Utilities Commission (CPUC) began considering and adopting regulations to protect the public from fire hazards due to overhead power lines and nearby aerial communication facilities. The CPUC published a “Fire Threat Map”—under Rulemaking 15-05-006 and following procedures in

Decision 17-01-009, revised by Decision 17-06-024—that adopted a work plan for the development of a utility "high fire threat district" where enhanced fire safety regulations in Decision 17-12-024 apply (CPUC 2025). The fire regulations require electric utilities to:

- Prioritize the correction of safety hazards.
- Correct nonimmediate fire risks in "Tier 2" (elevated fire threat) areas on the CPUC High Fire-Threat District within 12 months, and in "Tier 3" (extreme fire threat) areas within 6 months.
- Maintain increased clearances between vegetation and power lines in the High Fire Threat District.
- Maintain stricter wire-to-wire clearances for new and reconstructed facilities in Tier 3 areas.
- Conduct annual inspections of overhead distribution facilities in rural areas of Tier 2 and Tier 3 areas.
- Prepare a fire prevention plan annually if overhead facilities exist in the High Fire Threat District. (CPUC 2017)

## Fire Hazard Technical Advisory

The Governor's Office Land Use and Climate Innovation published the Fire Hazard Technical Advisory in 2015 and revised it in 2022 as a planning guide for addressing fire hazards, reducing risk, and increasing resilience across California's diverse communities and landscapes. The Fire Hazard Technical Advisory provides a range of goals, policies, and programs for fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery. The 2022 update includes specific land use strategies to reduce fire risk to buildings, infrastructure, and communities.

## California Environmental Quality Act

In November 2022 the California Attorney General issued the *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*. This guidance document was designed to help lead agencies comply with CEQA when considering whether to approve projects in wildfire-prone areas. This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation. The guidance is aimed at proposed development projects such as residential, industrial, or commercial developments. The extent to which it applies will vary by project based on project design and location. It does not impose additional requirements on local governments or alter any applicable laws or regulations but is intended to provide guidance on some of the issues,

alternatives, and mitigation measures that should be considered during the environmental review process.

## REGIONAL

### San Bernardino County Multi-jurisdictional Hazard Mitigation Plan

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The County of San Bernardino Multi-jurisdictional Hazard Mitigation Plan (MJHMP) was prepared and adopted in December 2022 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The MJHMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the County, including the San Bernardino County Fire Protection District, which provides fire services to the City of San Bernardino. The MJHMP does not cover the City of San Bernardino itself. In the context of a MJHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. The MJHMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations, and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide. The mitigation strategies in this plan related to wildfire include the Mountain Area Safety Taskforce, continuing mutual aid in the mountain areas, community based fuel reduction programs, forest care, fire hazard abatement on public and private properties, improving emergency access, structural fire break widening, and emergency water supplies.

### 2024 San Bernardino County Fire Protection District Strategic Plan

The San Bernardino County Fire Protection District Strategic Plan, developed by the Fire District and the community, provides a framework for the Fire Protection District to continue self-improvement while dealing with routine emergency incidents as well as major disasters such as wildfires, earthquakes, snowstorms, and pandemics. Goals of this plan include ensuring adequate workforce, maintaining internal communications, sustaining external communications, and maintaining a sustainable organization.

### San Bernardino County Emergency Operations Plan

The San Bernardino County Office of Emergency Services is responsible for coordinating agency response to disasters or other large-scale emergencies in the county. The San Bernardino County Fire Protection District provides fire protection services to the City of San Bernardino and is included in this plan. The San Bernardino County Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to

maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials.

## LOCAL

### City of San Bernardino Municipal Code

The City of San Bernardino Municipal Code (SBMC) includes various directives to minimize adverse impacts associated with wildfires in and surrounding the city. Most provisions related to wildfire and evacuation are in the following chapters:

- **Chapter 8.19, Abatement of Fire Hazards and Hazardous Trees.** This chapter of the SBMC adopts Title 2, Division 3, Chapter 3, Abatement of Fire Hazards and Hazardous Trees, of the San Bernardino County Code. This chapter requires landowners or persons in control of land to abate all fire hazards and hazardous trees from their land, in addition to sidewalks, parkways, road easements, and other easements. This chapter also requires defensible space within 100 feet of a building or structure, maintaining a firebreak for a distance of not less than 30 feet on each side of a building or structure to the property line, whichever is nearer, and providing a fuel break within 30 to 100 feet of a building or structure by disrupting the vertical and/or horizontal continuity of flammable and combustible vegetation with the goal of reducing fire intensity.

- **Chapter 8.79, Floodplain Management.** This chapter applies to all proposed development entirely or partially within a flood hazard area with the goal of minimize public and private losses due to flooding. Section 8.79.140, General Authority, of this chapter, designated the City Engineer at the Floodplain Administrator for the city. Any person, owner or authorized agent who intends to conduct any development in a flood hazard area shall first make an application to the Floodplain Administrator and shall obtain the required permit for floodplain development.

- **Chapter 13.36, Underground Utilities.** This chapter allows the Mayor or Common Council to designated areas within the City for the removal of poles, overhead wires, and associated overhead structures, and the installation of wires and facilities for supplying electric, communication, or similar services underground. If underground construction is necessary, the entity supplying the utility service shall furnish that portion of the conduits, conductors and associated equipment required to be furnished by it under its applicable rules.

- **Chapter 15.10, Foothill Fire Zone Building Standards.** The purpose of this chapter is to promote public safety and welfare by reducing the risk of injury, death, or property damage

that may result from wildland fires in the foothill areas of the city. This chapter designates the Very High FHSZs in the city, applies CBC Section 701A.3.2 to existing structures within this zone, and requires additional standards for fencing, windows, roofs, and roof coverings.

## City of San Bernardino Development Code

The existing Development Code includes provisions related to wildfire and evacuation in the following chapters:

- **Chapter 19.15, FF (Foothill Fire Zones Overlay) Zone.** The purpose of the Foothill Fire Zones Overlay zone is to mitigate the spread of fire, to help minimize property damage and to reduce the risk to public health and safety. This overlay zone identifies three foothill fire zones that have different degrees of hazard based on slope, type of fuel present, and natural barriers. The foothill fire zones are A) Extreme Hazard, slopes greater than 30 percent; B) High Hazard, slopes between 15 and 30 percent; and C) Moderate Hazard, slopes between zero and 15 percent. This chapter provides development standards for development within this overlay, including access and circulation, site and street identification, roadside vegetation, water supply, erosion control, and construction and development design.

- **Chapter 19.16, FP (Flood Plain Overlay) Zone.** The purpose of the Flood Plain Overlay zone is to protect public health, safety, and general welfare, and to minimize hazards due to flooding in specific areas as identified by the latest adopted Flood Insurance Rate Maps. This chapter provides development standards for development in the FP Zone, including anchoring, construction materials and methods, elevation flood-proofing, standards for utilities, standards for subdivisions, and standards for manufactured homes.

- **Chapter 19.17, HM (Hillside Management Overlay) Zone.** The purpose of this overlay zone is to provide for low-density residential development in the City's hillside areas and to assure that this development occurs in a manner which protects the hillside's natural and topographic character and identity, environmental sensitivities, aesthetic qualities, and the public health, safety, and general welfare. This zone applies to hillside areas in the northern area of the city with 15 percent or greater slope. This chapter provides performance standards for soils/grading, public safety, water and drainage, animal and plant life, and overall design.

## City of San Bernardino Local Hazard Mitigation Plan

The City of San Bernardino Local Hazard Mitigation Plan (LHMP) was prepared and adopted in August 2025 for the purpose of identifying, assessing, and reducing the long-term risk to life and property from hazard events. The LHMP includes an assessment of hazards and vulnerabilities and a set of mitigation actions for the city. In the context of a LHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, including wildfire. Mitigation actions related to wildfire in the San Bernardino LHMP include:

- **P5:** Develop means to evacuate community members who do not have access to private vehicles or are otherwise unable to drive.
- **P6:** Continue to ensure effective emergency notifications through multiple media formats—in at least English and Spanish—about pending, imminent, or ongoing emergency events. Ensure that information is accessible to people with access and functional needs.
- **1.03:** Identify and upgrade City facilities that can serve as key cooling centers and evacuation and sheltering locations.
- **1.05:** Work closely with community groups to increase awareness of hazard events and resiliency opportunities among socially vulnerable community members.
- **1.06:** Avoid building new City-owned key facilities in mapped hazard areas. If no feasible sites outside of mapped areas exist, ensure that such facilities are hardened against hazards beyond any minimum building requirements/mitigation standards.
- **1.08:** Coordinate with Caltrans to monitor bridges within the City and develop recommendations for upgrade/retrofit when deemed necessary. Prioritize upgrades/retrofits on key evacuation routes.
- **1.10:** Install and harden emergency backup power at critical facilities deemed necessary. Prioritize installations for facilities that serve as key cooling/warming and evacuation centers.
- **3.01:** Incorporate the most up-to-date fire codes, regulations, and ordinances into the General Plan.
- **3.03:** Promote the proper maintenance and separation of power lines from buildings, trees, and other potential obstructions, in coordination with SoCal Edison.
- **3.04:** Increase education and knowledge regarding safety and efficient response to fallen power lines in coordination with SoCal Edison.
- **3.05:** Coordinate programs with private entities to decrease highly flammable vegetation in the developed portions of the Wildland Urban Interface (WUI) and replant with fire-resistant specimens.
- **3.06:** Evaluate a hillside weed abatement pilot program using goats or other livestock to reduce fuel loads in fire-prone areas.
- **3.07:** Prepare a Community Wildfire Protection Plan for areas within the City prone to wildfire hazards.

- **3.08:** Work with property owners to manage dead vegetation on vacant properties, in flood control facility footprints, railroad rights-of-way, parks, and open spaces, especially during and after periods of extreme heat or prolonged drought.
- **3.10:** Conduct a fire hazard prevention awareness campaign for residents in the WUI and surrounding areas.
- **3.11:** Require all new development in the WUI and surrounding areas to use building materials and methods approved by CA Building Standards Commission and establish zones of defensible space around structures in these areas.
- **3.12:** Coordinate with the San Bernardino County Fire District for recommended landscaping vegetation lists and design recommendations that illustrate wildfire-resilient strategies.

The LHMP must be reviewed and approved by FEMA every five years to maintain eligibility for disaster relief funding. As part of this process, the California Governor's Office of Emergency Services reviews all local hazard mitigation plans in accordance with the Disaster Mitigation Act of 2000 regulations and coordinates with local jurisdictions to ensure compliance with FEMA's Local Mitigation Plan Review Guide.

### City of San Bernardino Emergency Operations Plan

The City of San Bernardino Police Department is responsible for coordinating agency response to disasters or other large-scale emergencies in the city. The City of San Bernardino Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination, procedures to maintain communications with regional and State emergency response teams, and methods to assess the extent of damage and management of volunteers, as well as identifies the location of Emergency Operations Centers. The EOP uses the Standardized Emergency Management System as required by California Government Code Section 8607(a) for managing responses to multiagency and multi-jurisdictional emergencies in California, including those related to hazardous materials.

## 3.20.2 Existing Conditions

### Wildfire Background

The term "wildfire" refers to fires that usually result from the ignition of dry grass, brush, or timber. Historically, wildfires commonly occurred in steep or heavily vegetated areas, away from developed areas. More recently, wildfires have been encroaching into more urban areas, or the wildland-urban interface, threatening homes, businesses, and essential infrastructure. Though wildfires play an important role in the ecology of many natural habitats, risks to human safety and property increase as urban development moves into areas susceptible to wildfire hazards.

## *Types of Wildfires*

There are three basic types of wildfires:

- **Crown fires** burn trees to their tops and are the most intense and dangerous wildland fires.
- **Surface fires** burn surface litter and duff and are known for being the easiest fires to extinguish and causing the least damage. Brush and small trees enable surface fires to reach treetops, and so are referred to as *ladder fuels* (NRC 2011).
- **Underground fires** occur underground in deep accumulations of dead vegetation. These fires move very slowly and can be difficult to extinguish due to limited access (Western Fire Chiefs Association 2024).

Wildfires burn in many types of vegetation—forest, woodland, scrub (including chaparral and sage scrub), and grassland. Many species of native California plants are adapted to fire, and habitats such as woodlands, chaparral, and grasslands can recover from fire. Between 2020 and 2025 an average of 856,923 acres burned per year throughout California (CAL FIRE 2025). Wildfires have been observed to be more frequent and growing in intensity over the past several years, with 4,304,379 acres and 2,569,386 acres burning in 2020 and 2021 across the State, respectively (CAL FIRE 2024b).

## *Wildfire Causes*

Although the term *wildfire* suggests natural origins, a 2017 study that evaluated 1.5 million wildfires in the United States between 1992 and 2012 found that humans were responsible for igniting 84 percent of wildfires, accounting for 44 percent of acreage burned (Balch et al. 2017). The three most common types of causes of human-caused wildfires are debris burning (logging slash, farm fields, trash, etc.); arson; and equipment use (Pacific Biodiversity Institute 2007).[1] Lightning is the major natural cause of wildfire in the United States, with more than 40 percent of wildfires in the western United States caused by lightning between 1992 and 2015 (Balch et al. 2017; Cart 2023).

Power lines can ignite wildfires in several ways, including:

- **Downed lines.** Downed power lines can produce arcing that can cause the powerlines to spark and ignite vegetation.

[1] Miscellaneous human activities (unspecified) are ranked above equipment use in percentage of wildfires caused.

- **Vegetation contact.** A branch contacting two conductors for a sufficient duration may ignite the branch; a tree falling on a line can cause a downed line.
- **High winds and severe weather.** Conductors can slap together during high winds and severe weather, creating arcing of the powerlines and ejecting hot metal particles that can ignite flammable matter on the ground.
- **Equipment failures.** As circuit components deteriorate, they can arc and spark and thus ignite nearby flammable matter. (Texas Wildfire Mitigation Project 2014)

An analysis of US Forest Service wildfire data from 1986 to 1996 determined that 95 percent of human-caused wildfires and 90 percent of all wildfires were within 0.5 mile of a road, and that about 61 percent of all wildfires and 55 percent of human-caused wildfires were within 650 feet (200 meters) of a road (Pacific Biodiversity Institute 2007). The study concluded that the increase in human-caused ignition greatly outweighs the benefits of increased access for firefighters.

Wildfires ignite structures in three ways: embers landing on the structure or flammable material next to the structure, direct flame contact, and radiant heat from fire close to the structure. Embers are the most common cause of home ignition. Embers ignite structures by entering through attic vents, igniting flammable materials around the home (litter in the roof gutter; wood stacks; or wood fencing), or finding their way under roofing materials (California Chaparral Institute 2024).

CAL FIRE estimated in 2017 that there were about three million housing units in California in FHSZs and potentially at risk from wildland fire—that is, just over 20 percent of the total housing units in the state (CAL FIRE 2018). A study conducted by the *Los Angeles Times* indicates that an additional 2.8 million Californians were added to the FHSZs due to the recent updates of the FHSZ maps in both the SRA and LRA (*Los Angeles Times* 2025). According to CAL FIRE data, approximately 95 percent of structures seriously damaged in California wildfires from 2013 to 2020 were in FHSZs in the SRA or LRA or on federal lands (CapRadio 2021).

### *Wildland-Urban Interface*

The Wildland-Urban Interface (WUI) is any area where structures and other human developments meet or intermingle with wildland vegetative fuels—shrubs, trees, and grasses. Developments in the WUI exacerbate fire occurrence and fire spread in several ways:

- Increased numbers of people near and in wildland areas, creating more frequent human-caused wildfires.
- Wildfires become harder to fight due to simultaneous evacuation and firefighting resources diverted from containing the wildfire to protecting lives and homes.

- Letting natural fires burn becomes impossible, leading to buildup of fuel in brush and forested areas and overgrowth of grasslands, increasing wildfire hazard further (Radeloff et al. 2018).

## *Secondary Effects of Wildfires*

Secondary effects of wildfire include additional hazards such as landslides, poor air quality, and power outages. This section describes potential secondary hazards.

### ***Post-fire Debris Flows***

Post-fire landslide hazards include fast-moving, highly destructive debris flows that can occur in the years immediately after wildfires in response to high-intensity rainfall events. Post-fire debris flows are particularly hazardous because they can occur with little warning, exert great impulsive loads on objects in their paths, strip vegetation, block drainage ways, damage structures, and endanger human life. Debris flows differ from mudflows in that debris flows are composed of larger particles.

Fires increase the potential for debris flows in two ways:

- Fires may bake soil into a hard crust that repels water.
- Fires destroy vegetation that would slow and absorb rainfall, and whose roots would help stabilize soil. (Oregon Water Science Center 2018)

Post-fire debris flows are most common in the two years after a fire and are usually triggered by heavy rainfall. It takes much less rainfall to trigger debris flows from burned basins than from unburned areas. In southern California, as little as 0.3 inches of rainfall in 30 minutes has triggered debris flows, and any storm that has intensities greater than about 0.4 inches per hour can produce debris flows (California Water Science Center 2018).

The burning of vegetation and soil on slopes more than doubles the rate that water will run off into watercourses. As discussed in Section 3.7.2, *Existing Conditions* [*Geology and Soils*], landslides and debris flows have the potential to occur in the city, most notably on steeper slopes in the northern and western parts of the city.

### ***Air Quality***

Regionally, smoke from wildfires creates poor air quality that can last for days or weeks, depending on the scale of the wildfire and wind patterns. Smoke itself is made up of a complex mixture of gases and fine particles produced when wood and other organic materials burn. Health risks from smoke inhalation are largely from microscopic particles ($PM_{2.5}$) that can penetrate the lungs and cause a range of health problems, including chronic heart and lung diseases. Exposure to particulate pollution is even linked to premature death. There are some populations that are more sensitive than others to smoke—for instance, people with heart or

lung diseases, older adults, children, people with diabetes, people with compromised immune systems, and pregnant women (US EPA 2025). Through observations of wildfires, experts have determined that the large plumes of smoke from large wildfires can result in that smoke and ash being carried thousands of miles from the burn area of the wildfire.

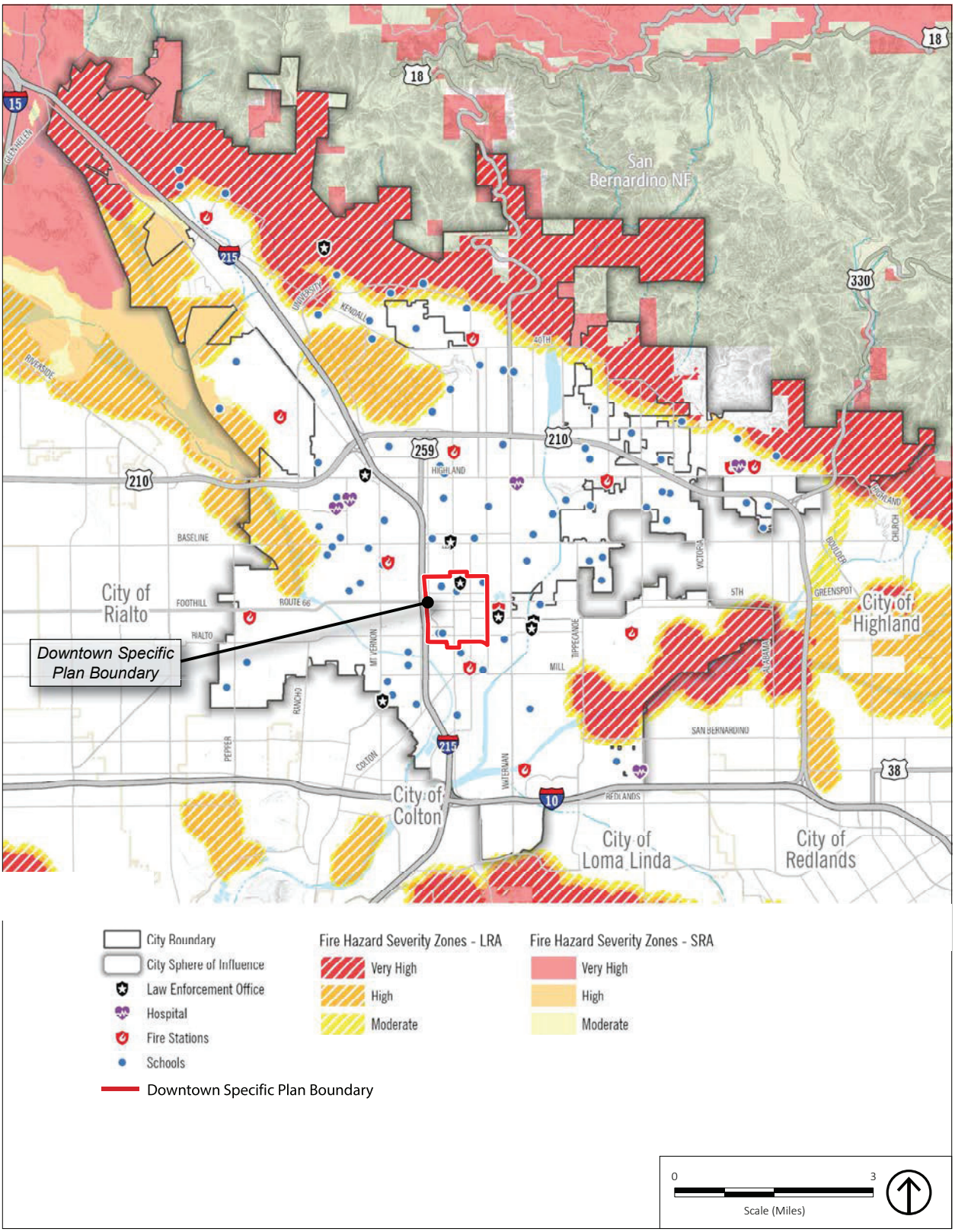
### *Other Secondary Affects*

In addition to damaging natural environments, wildfires also deplete water reserves, down power lines, disrupt communication services, and block evacuation routes, which can isolate neighborhoods. In some cases, electric power companies shut off power lines to prevent wildfires, also known as Public Safety Power Shutoffs, causing outages that can last for hour or days depending on the weather severity. Wildfires can indirectly cause flooding if flood control facilities become inadequate to handle increases in stormwater runoff, sediment, and debris that are likely to be generated from burn scars.

## Wildfire in San Bernardino

The geography, weather patterns, and vegetation in the City of San Bernardino and surrounding areas provide ideal conditions for recurring wildfires. As recent wildfire activity reveals, the mountainous areas of the city face high levels of threat from wildland fire. As shown in Figure 3.20-1, *Fire Hazard Severity Zones,* Very High FHSZs are in the northern and western areas of the city where the valley meets the San Bernardino National Forest, including areas along Interstate (I) 215, State Route (SR) 18, and SR-330.

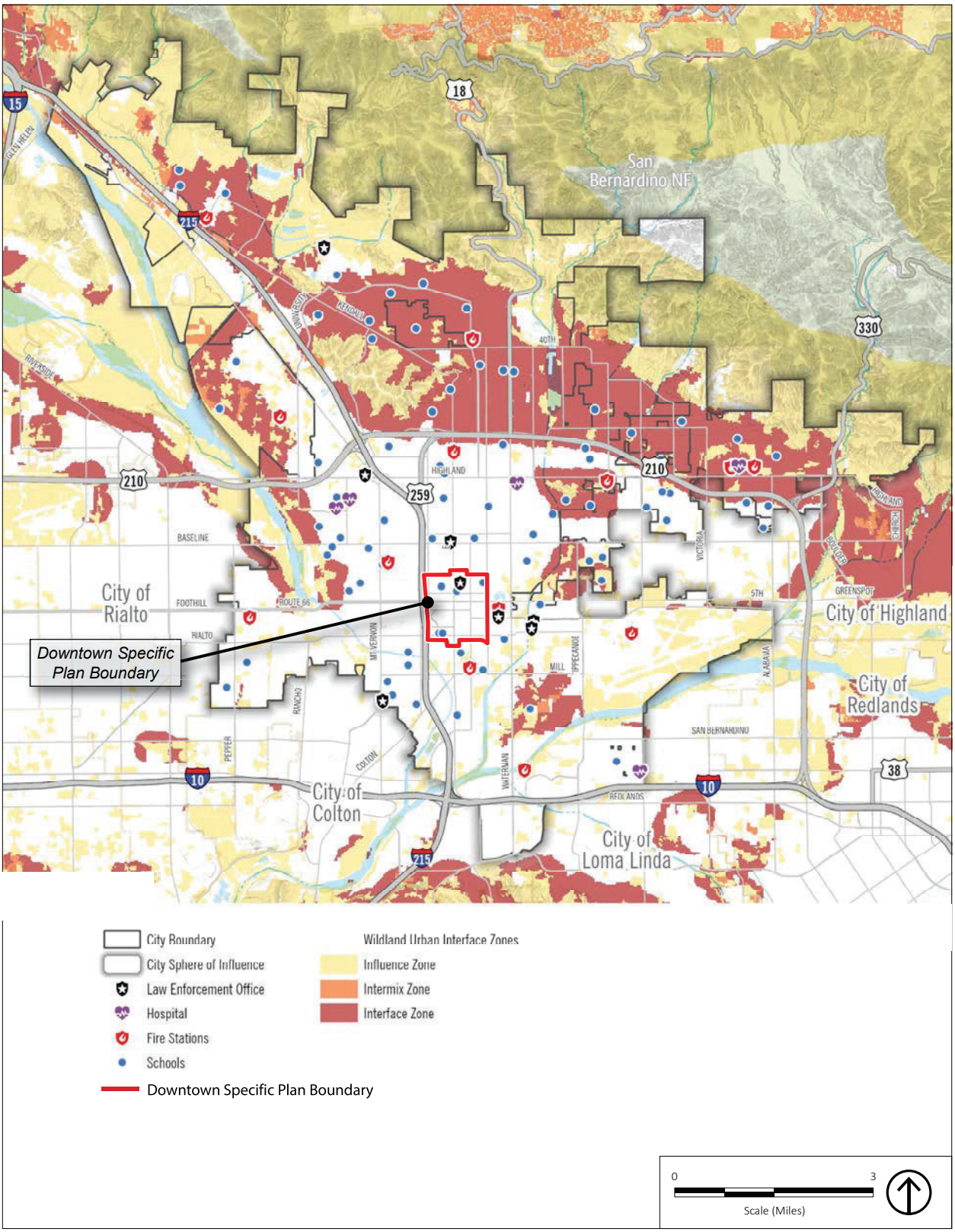
Figure 3.20-2, *Wildland-Urban Interface,* shows the WUI areas in San Bernardino as defined by CAL FIRE. WUI areas occur when urban development is intermixed with wildland vegetation, or when pockets of wildland vegetation occur inside developed areas. The WUI is subdivided into the intermix zone (where houses and wildland vegetation directly mingle), the interface zone (housing adjacent to wildland vegetation, but not mingled with it), and the influence zone (areas of wildfire-susceptible vegetation surrounding the other zones). The interface and intermix zones carry the highest risk for wildfires affecting developed areas. Fires in WUI areas are likely to damage or destroy buildings and infrastructure that support populations, the economy, and key services in the city. Some of the WUI areas in the city have few access roads, which poses challenges for evacuation and for emergency responders fighting fires and helping residents in these areas.




Source: Generated using ArcMap 2025; CAL FIRE 2025.

Figure 3.20-1
**Fire Hazard Severity Zones**

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Source: Generated using ArcMap 2024; CAL FIRE 2021.

Figure 3.20-2
**Wildland-Urban Interface**

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## *Wildfire History*

CAL FIRE maintains a list of historic fires throughout the state. According to CAL FIRE, the City of San Bernardino has experienced several wildfires in and near the city limits. Table 3.20-1, *Historic Wildfires in and Surrounding San Bernardino,* lists historic wildfire incidents larger than 300 acres that have affected the city from 1922 to 2024. Figure 3.20-3, *Historic Fires Within or Near San Bernardino by Acres Burned,* shows the historic wildfire perimeters for all fires that have burned in and surrounding San Bernardino between 1880 and 2024. The largest fire in recent years was the Old Fire in 2003.

**Table 3.20-1 Historic Wildfires in and Surrounding San Bernardino**

| Year | Fire Name | Size (Acres) |
|---|---|---|
| 1922 | Unnamed | 19,326 |
| 1923 | Unnamed | 1,241 |
| 1938 | Unnamed | 12,493 |
| 1941 | Unnamed | 2,178 |
| 1944 | Unnamed | 1,181 |
| 1954 | Panorama | 5,454 |
| 1956 | East Highland | 14,444 |
| 1957 | Verdemont | 1,629 |
| 1960 | McKinley | 1,781 |
| 1967 | State Highway #11 | 749 |
| 1970 | Bear | 51,655 |
| 1970 | Verdemont | 1,100 |
| 1979 | Shadow | 2,601 |
| 1980 | Panorama | 23,626 |
| 1980 | Windy | 445 |
| 1997 | Hemlock Fire – July | 3,947 |
| 2003 | Old | 91,428 |
| 2003 | Grand Prix | 50,618 |
| 2007 | Martin Ranch | 602 |
| 2015 | North Fire/Pines | 4,250 |
| 2015 | Lake Fire | 31,359 |
| 2016 | Blue Cut Fire | 36,274 |
| 2020 | Blue Ridge Fire | 13,694 |
| 2020 | El Dorado Fire | 22,744 |
| 2020 | Blue Cut Fire | 36,274 |
| 2024 | Line | 39,300 |

Source: CAL FIRE 2025.

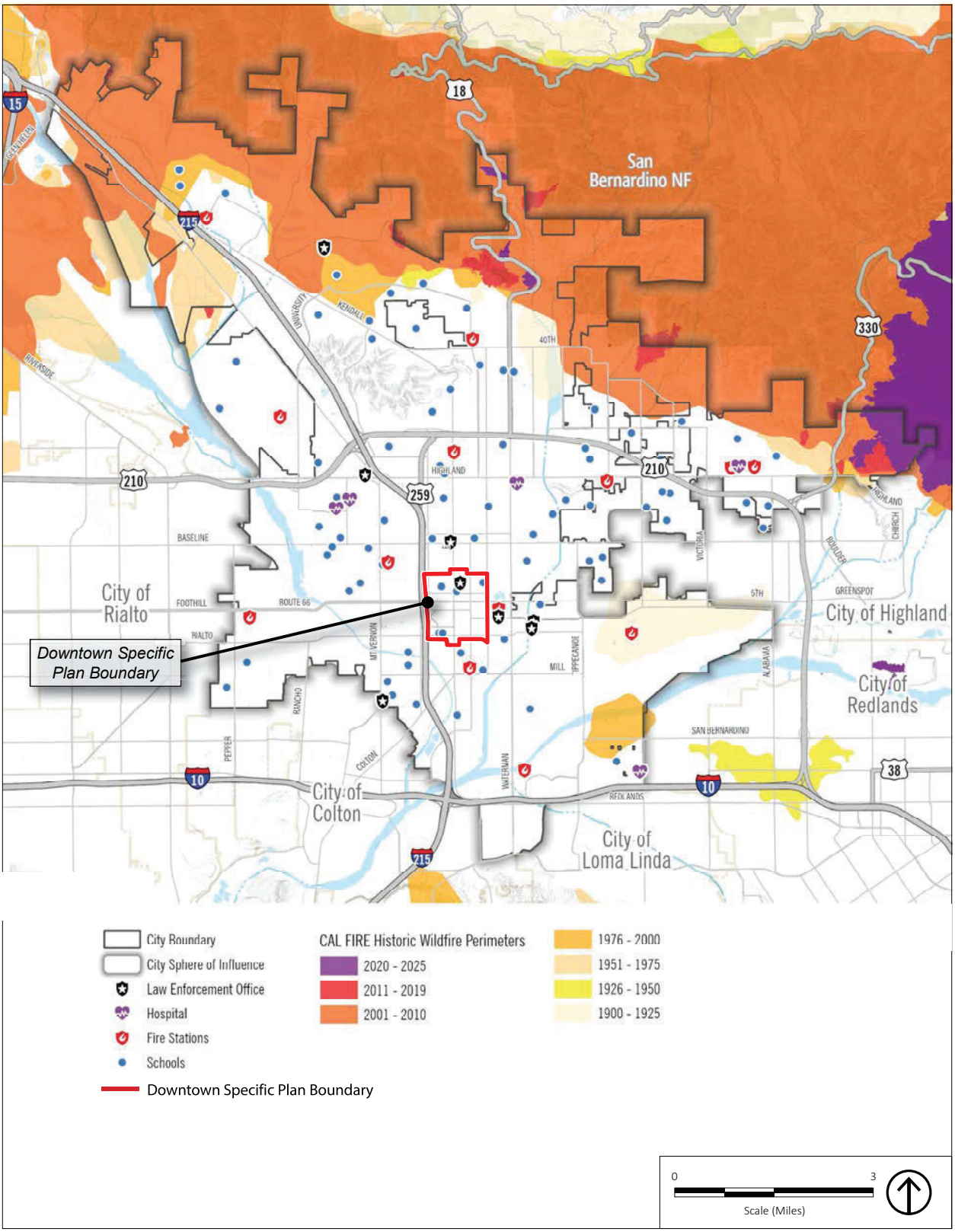
## *Factors Influencing Wildfire*

Several factors influence wildfire conditions and facilitate the spread of wildfires, including topography, fuels, weather conditions, and climate change. Human actions are also the leading cause of wildfires in California, increasing the risk of wildfire devastating natural lands and communities. This section describes five factors in the context of San Bernardino.

### *Weather*

The climate in San Bernardino is generally referred to as "Mediterranean," with hot, dry summers and cool, wet winters. Warm summers and cold winters with rainfall are common in the city. Rainfall typically occurs during the winter months due to storm fronts that move inland from the Pacific Ocean or south from the Sierra Nevada. The city receives an average of approximately 21 inches of precipitation annually (Cal-Adapt 2024a). Because the summer months are generally hot and dry, the risk of wildfires has historically been greatest in summer and fall. Relative humidity is also an important fire-related weather factor. As humidity levels drop, the dry air causes vegetation moisture levels to decrease, thereby increasing the likelihood that plant material will readily ignite and burn; the risk of wildfire increases when lightning strikes occur during dry periods.

Wind is a primary weather factor in wildfire behavior. Santa Ana winds are warm, dry winds that descend from the high desert, down the mountains of the Southern California Basin. San Bernardino is often affected by Santa Ana winds blowing through the San Gabriel and San Bernardino Mountain ranges via the Cajon Pass (San Bernardino 2024). As wind speeds increase, the rates of fire spread, intensity, and ember spread potential also increase. Gusty and erratic wind conditions, like those of the Santa Ana winds, can cause a wildfire to spread irregularly, making it difficult to predict its path and effectively deploy fire suppression forces. Winds from the southeast in the fall compound the severity of fire conditions, as does lower relative humidity, creating red-flag conditions. Santa Ana winds are especially dangerous because they are accompanied by low humidity, which can dry out trees and other fuel that may also be weakened by the winds. This can increase wildfire conditions in the area. Wind shifts can also occur suddenly due to temperature changes and interactions with steep slopes or hillsides, causing fires to spread unpredictably. Fall has historically been one of the most dangerous times for wildfire risk, as periods of very high temperatures, low humidity, and strong wind increases cause red flag warnings and extreme fire danger.




Source: Generated using ArcMap 2024; CAL FIRE 2021.

Figure 3.20-3
**Historic Wildfire Perimeters Within or Near San Bernardino**

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### *Fuel*

The hillside and mountain areas of the northern San Bernardino are covered by natural vegetation, which provides fuels such as grass, brush, and woodlands for wildfires. Each type of vegetation contributes to fire hazard severity to varying degrees. The qualities of vegetation that directly influence fire risk include fuel type and size, loading, arrangement, chemical composition, and dead and live fuel moisture, which contributes to the flammability characteristics of the vegetation. As described in Section 3.4, *Biological Resources*, of this Draft EIR, land cover in San Bernardino consists of 69 percent developed and disturbed areas, including residential, commercial, industrial, and office uses. Approximately 30 percent of the landcover consists of vegetation communities, which include chaparral, coastal scrub, forest and woodlands, non-native grasslands, riparian and desert wash, Riversidean alluvial fan sage scrub, and wetlands. Grass and brush fuel types react quickly to changes in weather such as low humidity or high wind speeds. Fires in areas covered by this vegetation type can spread quickly in gusty wind conditions.

### *Topography*

Slope is a measure of land steepness; wildfire intensity and rate of spread increase as slope increases due to the tendency of heat from a fire to rise via convection. For example, as slope increases from 20 to 40 percent, flame heights can double, and rates of fire spread can increase fourfold; from 40 to 60 percent, flame can become three times higher, and rates of spread can increase eightfold. The topography in San Bernardino is diverse, with valley areas in the southern portion to hilly and mountain slopes in the northern portion of the city. Areas with steep slopes in San Bernardino include areas along I-215 north of SR-210, and areas along the mountain slopes. These areas would also be more susceptible to debris flow after a fire.

### *Human Actions*

Most wildfires are ignited by human action, the result of direct acts of arson, carelessness, or accidents. Many fires originate in populated areas along roads and around homes and are often the result of the careless disposal of cigarettes, mowing of dead grass, electrical equipment malfunction, use of equipment, or burning of debris. Recreation areas with increased human activity that are in high or very high fire hazard areas also increase the potential for wildfires.

### *Climate Change*

Climate change is likely to increase annual average maximum temperatures in San Bernardino from a historical 75.3 degrees Fahrenheit (°F), to 81.4 °F by 2050 and 84.4 °F by 2100 (Cal-Adapt 2024a). This will likely create warmer temperatures earlier and later in the year. Precipitation levels are projected to increase slightly over the course of the century, changing from a historical annual average of 21.6 inches per year to an annual average of 21.4 inches by 2050 and an annual average of 23.9 inches by 2099 (Cal-Adapt 2024a). Variations in precipitation patterns will also lead to an increase in frequency and intensity of heavy precipitation events as

well as prolonged periods of drought. The combination of extreme heat and droughts can cause soils and vegetation to dry out, creating more fuel for wildfires. These factors are expected to increase wildfire conditions, creating the risk of more frequent and intense wildfires. Because wildfires burn the trees and other vegetation that help stabilize the hillside and absorb water, more areas burned by fire may also lead to an increase in landslides and floods. Historically, an average of 574 acres burned annually in the city (Cal-Adapt 2024b). Figure 3.20-3 shows historic wildfire perimeters in and near the city. Wildfires are projected to increase to an annual average in the city of 617 acres burned annually by 2050 and decrease to an annual average of 227 acres burned annually by 2100 (Cal-Adapt 2024b).

## Fire Protection Resources

### *San Bernardino County Fire Protection District*

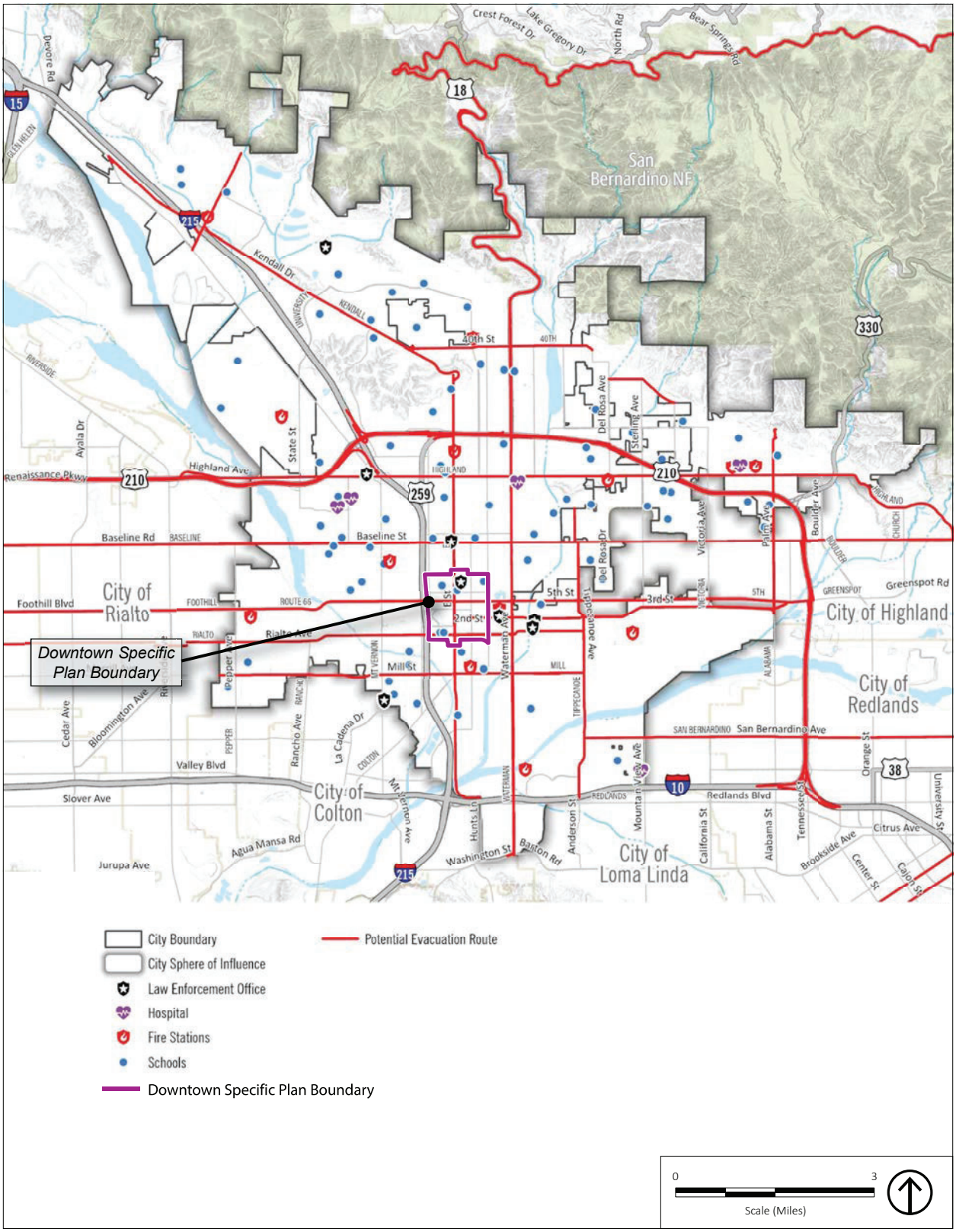
Fire protection service in San Bernardino are provided by the San Bernardino County Fire Protection District (SBCoFPD), which has provided fire protection and emergency medical response services to the city since July 1, 2016. Coverage for the city is provided by SBCoFPD East Valley Division, which has ten fire stations. SBCoFPD responds to hazards that include floods, fires, earthquakes, and train derailments and specializes in services such as the multiple household hazardous waste programs. Additional details about fire protection services are provided in Chapter 3.15, *Public Services.*

## Evacuation and Access

Evacuation routes are designated roadways that allow many people to quickly leave an area due to a potential or imminent disaster. These routes should have sufficient capacity to accommodate the needs of the community, be safely and easily accessible, and allow people to travel far enough away to be safe from emergency conditions.

As shown in Figure 3.20-4, *Potential Evacuation Routes*, dozens of evacuation routes cross the city. The primary evacuation routes that have capacity to transport the largest number of vehicles, include Interstate 215, Interstate 10, and State Route 210. Smaller routes that connect to these major evacuation routes include, but are not limited to, State Route 18, State Routes 330, and State Route 66. During emergencies, the San Bernardino Police Department coordinates evacuations warnings and orders. Evacuations are also coordinated through the San Bernardino County emergency alert program, SB Ready App.

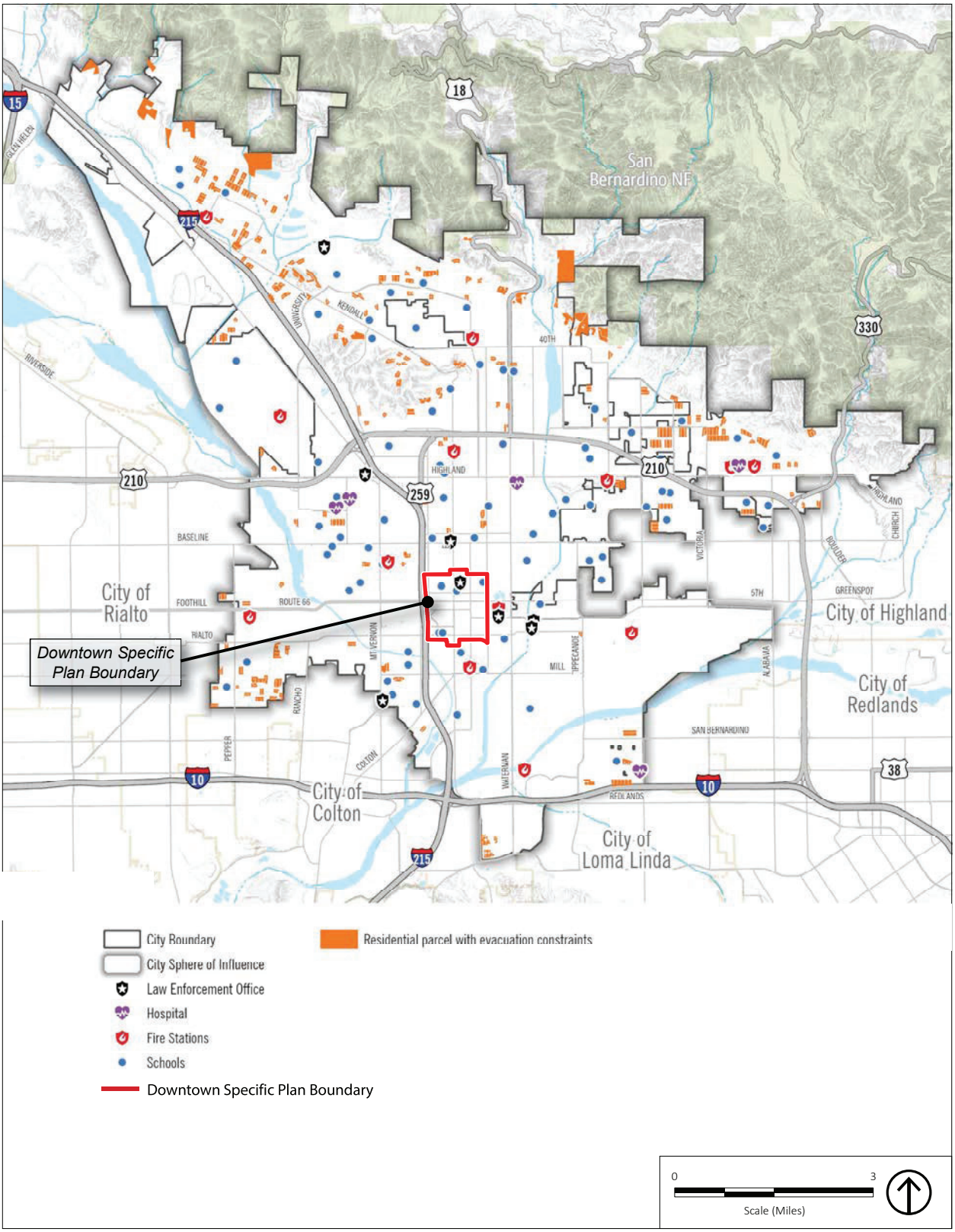
In hillside areas in northern San Bernardino, several neighborhoods have evacuation constraints, such as only one road in and out of a neighborhood. Figure 3.20-5, *Evacuation Constrained Residential Parcels*, shows identified evacuation-constrained residential areas throughout the city, many of which are in fire hazard severity zones pursuant to California Government Code Section 65302(g)(5).




Source: Generated using ArcMap 2024

Figure 3.20-4
**Potential Evacuation Routes**

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Source: PlaceWorks, City of San Bernardino, 2026

Figure 3.20-5
**Evacuation Constrained Residential Parcels**

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### DOWNTOWN AREA

The DTSP Area is outside of the Very High FHSZ and the WUI, as shown on Figures 3.20-1 and 3.20-2, respectively. Historic fires have not burned through the area. The DTSP Area is in a flat, valley portion of the city and consists of urban and built up land uses, including residential, commercial, and office buildings; associated parking; and ornamental landscaping. The SBCoFPD provides fire protection service to the DTSP Area; the closest fire station, Fire Station 222, is at 2641 North E Street. The DTSP Area is laid out in a grid format, and as shown in Figure 3.20-5, *Evacuation-Constrained Residential Parcels,* does not contain any residential parcels with evacuation constraints.

## 3.20.3 Standards for Analysis

### SIGNIFICANCE CRITERIA

State CEQA Guidelines **Appendix G, Environmental Checklist Form,** includes questions concerning wildfire hazards. The issues presented in the Environmental Checklist Form have been used to formulate thresholds of significance in this section. Accordingly, the proposed project would have a significant effect concerning wildfire hazards if it would:

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

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

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

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

### METHODOLOGY

The City of San Bernardino Local Responsibility Area Fire Hazard Severity Zone map was reviewed to determine whether the city has lands in or near a State Responsibility Area or lands classified as a Very High FHSZ. Due to the presence of lands classified as Very High FHSZs and an adjacent State Responsibility Area, the proposed project was evaluated for impacts related to wildfire. The analysis includes a review of the City of San Bernardino EOP; slope, wind, and

vegetation factors related to wildfire risk; required infrastructure to implement the proposed project; and cross-referencing of Chapter 3.7, *Geology and Soils*, and Chapter 3.10, *Hydrology and Water Quality*, of this Draft EIR to determine impacts.

## 3.20.4 Project Impact Analysis

**a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

### GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Adopted emergency response plans and emergency evacuation plans include those discussed under Section 3.20.1.1, *Regulatory Framework,* such as the City of San Bernardino EOP. The General Plan Update could result in a significant impact if it substantially impairs implementation of the EOP.

Potential development under the General Plan Update would be required to integrate the EOP as necessary into development to continue facilitating evacuation for the people living and working in wildfire-prone areas. The buildout under the General Plan Update would not result in substantial changes to the circulation patterns or emergency access routes in the city that would conflict with or require changes to the EOP. Future development, regardless of whether it includes new development or redevelopment, is required to comply with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation. Additionally, future development in the Very High FHSZs would be required to comply with the Very High FHSZ Fire Safe Regulations, the California Building Standards Code, the California Fire Code, and the SBMC, which set maximum lengths of single-access roads, minimum widths of roadways, and requirements for fuel management around roadways.

A temporary impact to emergency operations and evacuation under the proposed General Plan Update could occur from construction of potential future development projects if they were to result in temporary lane closures that would potentially alter evacuation routes. However, potential future development over the buildout horizon of the General Plan Update would be required to comply with applicable local and State regulations and obtain approval for temporary lane closures from Caltrans or the City, which would prohibit the obstruction of the circulation network. Additionally, these would be limited to the duration of the construction period, and direct impacts of construction would be evaluated during the permit review process by the City, SBCoFPD, and/or CAL FIRE. Review and approval of temporary lane closures, if needed, for future development projects in the city would ensure that no inconsistencies with emergency evacuation plans would occur.

Table 3.20-2, *Wildfire Evacuation: Proposed General Plan Update Policies,* shows all the policies and actions that would minimize impacts related to emergency response and evacuation.

**Table 3.20-2 Wildfire Evacuation: Proposed General Plan Update Policies**

| | |
|---|---|
| Safety Element | |
| **S-1.3** | **Hazard and Evacuation Route Awareness.** Promote hazard preparedness and awareness of evacuation routes to all residents, ensuring resources are available in multiple languages and formats for people with different or limited access and functional needs. |
| **S-1.5** | **Access to Critical Facilities.** Ensure that critical, high-occupancy, and essential facilities have adequate access for emergency personnel to access the facility in the event of an emergency or disaster. |
| **S-1.13*** | **Emergency Evacuation Routes.** Ensure emergency evacuation routes are built and maintained to remain open during and after disasters. Reassess evacuation routes and develop a multi-hazard evacuation plan to ensure routes are functional. |
| **S-1.14*** | **Evacuation Constrained Parcels.** Explore secondary means of ingress and egress in areas with evacuation constraints, as shown in Figure S-3, Evacuation Constrained Residential Parcels, for existing subdivisions or developments of 10 units or more. |
| **S-1.15** | **Warning and Notification.** Work with SBCFD to provide early-warning and notification of emergencies and disasters that will convey information in multiple languages and formats to ensure it is widely accessible, including to people with access and functional needs. |
| **S-6.4*** | **Residential Development in Very High Fire Hazard Severity Zones.** Avoid new residential development in Very High Fire Hazard Severity Zones. Where infeasible, residential development shall:<br>▪ Adhere to the California Building Code, California Fire Code, and Fire Safe Standards requirements.<br>▪ Provide adequate water conveyance infrastructure to meet daily and fire-flow requirements.<br>▪ Install fire-resistant native landscaping and fuel breaks, which shall be required in residential areas.<br>▪ Identify at least two points of access for day-to-day and evacuation purposes, make improvements, and maintain routes to ensure adequate capacity.<br>▪ Install visible home numbering and street signs that identify evacuation routes. |

* Denotes mitigating policies.

Implementation of these policies would increase the effectiveness of the Emergency Operations Plan and therefore would not impair or conflict with the plan.

As discussed in Chapter 2, *Project Description*, future potential development under the General Plan Update could occur in Very High FHSZs in northern San Bernardino. Future development, regardless of whether it includes new development or redevelopment, is required to comply

with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation.

Implementation of the proposed General Plan Update would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is outside of the Very High FHSZ and the WUI, as shown on Figures 3.20-1 and 3.20-2, respectively. The DTSP Area is in a flat, valley portion of the city consisting of urban and built-up land uses, including residential, commercial, and office buildings; associated parking; and ornamental landscaping. Due to the absence of land within a Very High FHSZ, the WUI, or in an evacuation-constrained area, **no impact** would occur from implementation of the DTSP.

**Significance without Mitigation:** No impact.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

As discussed in Section 3.20.1.2, *Existing Conditions*, San Bernardino is prone to Santa Ana winds in early fall through early spring. These winds have high speeds and can shift suddenly, and they are often accompanied by low humidity. They create dangerous conditions for starting and spreading wildfires, and they also spread wildfire smoke hazards, as can prevailing winds.

Section 3.20.1.1, *Regulatory Framework*, describes plans, policies, regulations, and procedures that help to reduce wildfire risks. The 2024 CAL FIRE Strategic Fire Plan, 2021 California Wildfire and Forest Resilience Action Plan, San Bernardino Local Hazard Mitigation Plan, City of San Bernardino Emergency Operations Plan, and San Bernardino County Multi-jurisdictional Hazard Mitigation Plan are intended to reduce wildfire hazards and coordinate response to these hazards on a statewide and regional scale. In addition, the South Coast Air Quality Management District and San Bernardino County Public Health provide air quality alerts, advisories, and an interactive online map to view current air quality conditions in the region. Furthermore, the proposed General Plan Update Safety Element includes Policy S-1.16, which requires the City to establish a network of equitably located resilience hubs that offer refuge from poor air quality due to regional wildfire smoke.

However, future potential development under the proposed General Plan Update in northern areas of the city could exacerbate wildfire risks by adding people to wildfire-prone areas and exposing people in the city and surrounding jurisdictions and unincorporated lands to pollutant concentrations from a wildfire, especially during Santa Ana wind events. A wildfire combined with prevailing winds or Santa Ana winds could expose residents in the city to the uncontrolled spread of wildfire.

As discussed in Section 3.20.1.2, *Existing Conditions*, the topography in wildfire-prone areas of San Bernardino consists of hilly to steep slopes along the edge of the San Bernardino National Forest. Construction of potential future development in these areas may require grading and site preparation activities that could change the slope of a single parcel or site. Though most future potential development would occur in the valley portion of the city, development and redevelopment in San Bernardino could occur where topography is steeper.

All potential future development in San Bernardino in Very High FHSZs would be required to comply with the California Building Standards Code, Very High FHSZ Fire Safe Regulations, Foothill Fire Zone Building Standards and Hillside Management Overlay, and grading requirements, which include standards to minimize the spread of wildfire and soil instability due to slopes. Additionally, the proposed General Plan Update includes Fire Hazard Policy S-6.7, which requires the City to adopt and enforce requirements of the California Building Standards Code, California Fire Code, and Very High FHSZ Fire Safe Standards.

Compliance with the Foothill Fire Zones Overlay and Hillside Management Overlay requirements requires new development to minimize grading of steep slopes and soil erosion. Wildfire smoke could potentially travel up a slope during a wildfire. Therefore, even with existing regulatory requirements, SBMC requirements, and proposed Safety Element policies, potential future development under the proposed General Plan Update could expose people to the uncontrolled spread of wildfire or pollutant concentrations due to slope.

Other factors, such as vegetation, have the potential to exacerbate wildfire risks. The grassland, brush, and woodland areas of northern San Bernardino are easily ignited, especially during late summer and fall when temperatures and winds are high and relative humidity is low. During these conditions vegetation can dry out, particularly in areas with unirrigated vegetation, becoming extremely flammable and increasing wildfire risks.

As described in Section 3.20.1.1, *Regulatory Framework*, the City of San Bernardino LHMP and San Bernardino MJHMP contain several vegetation management, fuel reduction and maintenance, and fuel break projects to reduce the uncontrolled spread of wildfire due to vegetation on both public and private land. Additionally, all potential future development in wildfire-prone areas in San Bernardino would be required to comply with Very High FHSZ Fire Safe Regulations, Public Resources Code Section 4291, California Government Code Section 51182, the California Fire Code, and the SBMC. These regulations have specific requirements for

new and existing development to create defensible space and extensive fuel reduction within 100 feet of a structure, an ember-resistant zone within 5 feet of a structure, and the overall maintenance of properties to reduce the risk of uncontrolled fires or the spread of fires to other properties.

Table 3.20-3, *Wildfire Risk: Proposed General Plan Update Policies,* shows all the policies and actions that would minimize wildfire risks associated with the proposed General Plan Update.

**Table 3.20-3 Wildfire Risk: Proposed General Plan Update Policies**

| | |
|---|---|
| **Safety Element** | |
| S-6.2* | **Local Code Compliance.** Require that development in the Very High Fire Hazard Severity Zones , shown on Figure S-12, is subject to provisions of the Hillside Management Overlay District and the Foothill Fire Zones Overlay. |
| S-6.3* | **Fire Retardant Roofing.** Continue to require that all new construction projects as well as rehabilitation projects that include the replacement of roofs of existing structures use fire retardant materials. |
| S-6.4* | **Residential Development in Very High Fire Hazard Severity Zones.** Avoid new residential development in Very High Fire Hazard Severity Zones. Where infeasible, residential development shall:<br>▪ Adhere to the California Building Code, California Fire Code, and Fire Safe Standards requirements.<br>▪ Provide adequate water conveyance infrastructure to meet daily and fire-flow requirements.<br>▪ Install fire-resistant native landscaping and fuel breaks, which shall be required in residential areas.<br>▪ Identify at least two points of access for day-to-day and evacuation purposes, make improvements, and maintain routes to ensure adequate capacity.<br>▪ Install visible home numbering and street signs that identify evacuation routes. |
| S-6.5* | **Fire Safety Plans.** Require new development in the Very High FHSZs or the Wildland Urban Interface to have a fire safety plan, in consultation with and approval by San Bernardino County Fire Protection District, prior to the issuance of building permits. |
| S-6.6* | **Fire Safe Regulations.** Require property owners of development in Local Responsibility Area shown on Figure S-12, to comply with building, defensible space, and fuel break standards in the Public Resources Code (PRC 4291) and Very High Fire Hazard Severity Zone Fire Safe Regulations. |
| S-6.7* | **Building Code Compliance.** Adopt and enforce the most recent version of the California Building Code and Fire Code, including local amendments, as well as the California Very High Fire Hazard Severity Zones Regulations for new and existing development. |
| S-6.8 | **Fire Hazard Reduction Projects.** Continue to work with the San Bernardino County Fire Protection District to implement fire hazard reduction policies and projects, in accordance |

### Table 3.20-3 Wildfire Risk: Proposed General Plan Update Policies

| | |
|---|---|
| **Safety Element** | |
| | with the City's Local Hazard Mitigation Plan, the General Plan, and the Capital Improvement Program. |
| S-6.9 | **Brush Removal and Weed Abatement**. Support brush removal and weed abatement in developed areas within the City to minimize fire risk, and coordinate with the San Bernardino County Fire Protection District, CALFIRE, and the U.S. Forest Service for brush removal in areas outside of City limits. |
| S-6.10 | **Fuel Modification Zones.** Developers of property on or abutting hillsides shall implement, with consultation and approval from the San Bernardino County Fire Protection District, a fuel-modification zone, between natural open space and planned development to lessen the fire hazard potential in interface areas. |
| S-6.15* | **Post-Fire Redevelopment.** Require redevelopment after wildfires to meet current California Building Code, California Fire Code, and California Very High Fire Hazard Severity Zone Fire Safe Regulation to reduce future vulnerabilities through site preparation, layout design, fire-resistant landscaping, and fire-retarding design and materials. |
| S-6.16 | **Post Fire Slope Stabilization.** Coordinate with local, state, and federal agencies as appropriate to stabilize burned slopes after a wildfire to prevent debris flows during winter months and to encourage the regrowth of native plants that help (re)stabilize burned slopes. |

* Denotes mitigating policies.

These policies would ensure that fire hazard reduction measures are met and maintained, and that existing and new development in brush and woodland areas incorporates vegetation management measures. However, even with existing regulatory requirement and proposed Safety Element policies, potential future development under the proposed General Plan Update could expose people to the uncontrolled spread of wildfire or pollutant concentrations due to factors such as vegetation.

Adherence to the above building practices, fire safety regulations, and vegetation fuel management requirements would reduce the potential for exacerbating wildfire risks. However, due to the programmatic nature of this analysis, the unknown details and potential impacts of specific future potential development projects under the proposed General Plan Update, and the potential for future development to be in wildfire-prone areas, impacts would still be **potentially significant**.

**Impact WIL-1a: Development under the General Plan Update would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.**

**Mitigation Measures:** No feasible mitigation measures are available.

**Significance without Mitigation:** Significant and unavoidable. Implementation of the proposed General Plan Update could increase population, buildings, and infrastructure in wildfire-prone areas. Though the proposed General Plan Update policies and mandatory State wildfire hazard reduction measures reduce risks in wildfire-prone areas, impacts related to exacerbating the risk of pollutant concentrations from wildfire and the uncontrolled spread of wildfire would be reduced, but not to a less-than-significant level.

The proposed General Plan Update contains policies that require existing development and new and redevelopment projects to create and maintain fire-safe vegetation around structures and roadways, enforce fire-safe standards, and create fuel breaks. New development would also be required to prepare fire protection plans and maintain defensible space around roads and structures. These policies provide the best wildfire hazard reduction measures available. However, the only way to fully avoid the wildfire impact is to not allow development in Very High FHSZs or the WUI. Prohibiting new development in San Bernardino is not feasible or practical because the City has a responsibility to meet other, conflicting obligations, including increasing the numbers and types of housing available. Therefore, this type of measure, prohibiting development, is considered and rejected.

Due to potential unknown impacts from future development under the proposed General Plan Update, impacts at the programmatic level would remain **significant and unavoidable**. This conclusion does not preclude a finding of less-than-significant impacts at the project level.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is outside of the Very High FHSZ and the WUI, as shown on Figures 3.20-1 and 3.20-2, respectively. The DTSP Area is in a flat, valley portion of the city and consists of urban and built up land uses, including residential, commercial, and office buildings; associated parking; and ornamental landscaping. Due to the absence of land within a Very High FHSZ, the WUI, or in an evacuation-constrained area, **no impact** would occur from implementation of the DTSP.

**Significance without Mitigation:** No impact.

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

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Buildout under the proposed General Plan Update would require the installation of new roadways, fuel breaks, emergency water sources, transmission lines, and other utilities to serve future potential development in San Bernardino.

- **Roadways.** As discussed in Section 3.17, *Transportation*, proposed buildout of the General Plan Update would include new roadways to connect to new developments throughout the city; many of these developments would be in Very High FHSZs. Potential future development under the General Plan Update could also create new or expanded roadways in fire-prone areas of San Bernardino, including converting unpaved roads to paved access roads, developing roadways to new development, and expanding existing roads to accommodate evacuation and multimodal forms of transportation.

- **Fuel Breaks.** Safety Element Policies S-6.4 and S-6.10 require that new development in Very High FHSZs install fuel breaks, create and maintain defensible space, and create fuel modification zones. These activities would apply in very high FHSZs and the WUI areas in northern San Bernardino.

- **Emergency Water Sources.** Safety Element Policies S-6.12 and S-6.13 ensure that existing and future development have sufficient water supplies for fire-fighting purposes and structural suppression, which would require the installation of new water conveyance infrastructure in new residential development or areas not served by adequate water supplies to meet California Fire Code requirements.

- **Power lines.** Potential future development under the proposed General Plan Update would require electrical line installations and connections to provide power to buildings and infrastructure. Safety Element Policy S-5.4 requires continued collaboration with Southern California Edison to underground electrical transmission infrastructure throughout the city, prioritizing high-voltage transmission lines and areas in Very High FHSZs, the WUI, and High Wind Hazard Areas.

- **Other Utilities.** Potential future development under the proposed General Plan Update would also require the installation and maintenance of water systems, sewer systems, internet infrastructure, and stormwater systems in wildfire-prone areas.

These types of improvements would involve temporary construction and result in changes to the existing built environment. The installation and operation of new aboveground power transmission lines would create a higher risk of wildfire compared to other infrastructure. However, as stated above, the Safety Element encourages the undergrounding of new and existing electrical transmission lines, which is consistent with SBMC Chapter 13.36, Undergrounding Utilities. Additionally, the California Public Utilities Commission requires maintenance of vegetation around power lines, strict wire-to-wire clearances, annual

inspections of aboveground power lines, and preparation of fire prevention plans for aboveground power lines in high-fire-threat districts. These measures would reduce the wildfire risks associated with the installation and maintenance of power lines.

Development in the wildfire-prone areas of northern San Bernardino would also be required to comply with building and design standards in the California Standards Building Code and California Fire Code, which include provisions for fire-resistant building materials, clearance of debris, and fire safety requirements during demolition and construction activities. Additionally, Public Resources Code Section 4291 and California Government Code Section 51182 require a defensible space within 100 feet of a structure and an ember-resistant zone within 5 feet of a structure. Furthermore, Very High FHZS Fire Safe Regulations would prevent structures from being within 30 feet of a roadway, reducing the potential for new roadways to exacerbate wildfire risks. These measures, along with policies in the proposed General Plan Update Safety Element for undergrounding of power lines, creation and maintenance of vegetation, and ensuring adequate water supplies, would minimize wildfire risks associated with the installation and maintenance of infrastructure.

Such infrastructure and maintenance activities would also be required to comply with the adopted State regulations, SBMC standards, and the proposed General Plan Update policies to mitigate the impact of infrastructure on the environment. Therefore, this impact is **less than significant**.

**Significance without Mitigation:** Less than significant.

## DOWNTOWN SPECIFIC PLAN

The DTSP Area is outside of the Very High FHSZ and the WUI, as shown on Figures 3.20-1 and 3.20-2, respectively. The DTSP Area is in a flat, valley portion of the city and consists of urban and built-up land uses, including residential, commercial, and office buildings; associated parking; and ornamental landscaping. Due to the absence of land within a Very High FHSZ, the WUI, or in an evacuation-constrained area, **no impact** would occur from implementation of the DTSP.

**Significance without Mitigation:** No impact.

**d) Would the project 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?**

## GENERAL PLAN AND DEVELOPMENT CODE UPDATE

Wildfires, such as the 2003 Old Fire, 2016 Blue Cut Fire, and the 2024 Line Fire, can create favorable conditions for other hazards, such as flooding and landslides during the rainy season. Wildfires on hillsides can burn the vegetation that stabilizes the slope and create hydrophobic conditions that prevent the ground from absorbing water. This can lead to landslides, debris flows, and flooding. A project would result in a significant impact if—due to slopes, drainage patterns, or postfire slope instability—it would expose people or structures to significant risks from landsides, debris flows, or flooding.

As discussed in Section 3.10, *Hydrology and Water Quality*, parts of San Bernardino are in the 100-year and 500-year floodplains. As shown on Figure 3.10-1, *Floodplains,* floodplains in the city generally follow the drainage patterns of the Cajon Wash, Lytle Creek, East Twin Creek, Warm Creek, and City Creek, which flow southeast from the mountains to the Santa Ana River.

As discussed in Section 3.7, *Geology and Soils*, slopes in the northern portion of the city are in areas with high landslide susceptibility, which coincide with Very High FHSZs. These areas are considered prone to earthquake-caused landslides and susceptible to landslides from precipitation and other causes. This overlap may cause areas outside of a flood hazard or landslide-susceptible zone to be affected by runoff, postfire slope instability, or drainages changes following a wildfire.

Potential future development under the proposed General Plan Update could contribute to postfire slope instability or drainage changes upstream. However, proposed Safety Element Policy S-4.6 requires new construction in landslide susceptibility areas to be evaluated for site stability, and Policy S-4.7 requires slope stability analyses to be conducted for new development in hillside areas, in addition to compliance with the Hillside Management Overlay Zone. Proposed Safety Element Policy S-3.1 requires new development in flood hazard zones to comply with the Flood Plain Overlay Zone; Policy S-3.3 requires new development to include green infrastructure that absorbs impacts from stormwater and flooding; and Policy S-3.5 requires drainage in the foothill areas to be designed to convey 100-year storm flows where downstream systems are lacking. Furthermore, all new development in the city is required to comply with State and local regulations, such as the California Building Code and SBMC both of which have provisions to reduce flooding and landslides in existing and new development. For example, Section 1803 of the 2025 California Building Code requires a geotechnical investigation that must assess existing landslide susceptibility on a project site. Additionally, the proposed Development Code Update's Flood Plain Overlay Zone and Hillside Management Overlay Zone provide regulations for existing and new development to reduce landslide and flooding potential downslope or downstream.

New development complying with these policies of the proposed General Plan Update would not expose people or structures to downslope landslides or downstream flooding due to

postfire hazards. Furthermore, as identified in Impact Discussion a) and Impact Discussion b), development under the proposed General Plan Update must also comply with best management practices regarding wildfire prevention, action, and recovery as outlined in the San Bernardino Emergency Operations Plan and San Bernardino LHMP. All future development, regardless of the location, is required to comply with adopted local, regional, and State plans and regulations addressing wildfire prevention, which would minimize risks of postfire hazards. Compliance with these policies and regulatory requirements would ensure that impacts from postfire instability would be **less than significant**.

**Significance without Mitigation:** Less than significant.

### DOWNTOWN SPECIFIC PLAN

The DTSP Area is outside of the Very High FHSZ and the WUI, as shown on Figures 3.20-1 and 3.20-2, respectively. The DTSP Area is in a flat, valley portion of the city and consists of urban and built-up land uses, including residential, commercial, and office buildings; associated parking; and ornamental landscaping. Due to the absence of land in a Very High FHSZ, the WUI, or an evacuation-constrained area, **no impact** would occur from implementation of the DTSP.

**Significance without Mitigation:** No impact.

## 3.20.5 Cumulative Impact Analysis

The cumulative setting for wildfire includes potential future development in San Bernardino, surrounding cities, and unincorporated county areas that may exacerbate wildfire risks.

**Would the project have a cumulative effect related to wildfire?**

Future development over the buildout horizon of the proposed General Plan Update would not impair an adopted emergency response plan or emergency evacuation plan; would not exacerbate wildfire risks due to the installation or maintenance of infrastructure; and would not cause downslope or downstream post-fire flooding or landslide hazards. Cumulative development in the surrounding local jurisdictions and State lands would be subject to the same State regulations applicable to future projects over the buildout horizon. Although federal lands would not be subject to State regulations, they would still be subject to the National Cohesive Wildfire Management Strategy, NFPA Standards, and specific wildfire management provisions implemented by the U.S. Forest Service.

However, the General Plan Update would result in significant and unavoidable impacts where it would potentially expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, vegetation, or other factors, as described under Impact Discussion b). The addition of other proposed development projects in

adjacent jurisdictions in similar environments that are sloped and contain high fuel loads would have the potential to contribute to cumulative wildfire risks. These projects would have the potential to result in significant environmental impacts, and they could also expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, vegetation, or other factors. This would potentially result in significant cumulative impacts when taken into consideration with the proposed General Plan Update.

Future potential development in the project area and the surrounding region would be required to comply with the same State regulations, such as Very High FHSZ Fire Safe Regulations, PRC Section 4291, CBC, and CFC. State lands and unincorporated county would also implement wildfire reduction strategies through implementation of the San Bernardino County MJHMP and the State Hazard Mitigation Plan. However, the increase of potential development projects within the Very High FHSZs and the WUI outside of the city would result in a cumulatively significant impact due to the inherent risk of any increased human activity in these areas. Therefore, this cumulative impact is **significant**.

**Impact WIL-2:** Potential future development under the proposed General Plan Update could, in combination with other surrounding and future projects in the Very High FHSZs and the WUI, result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, vegetation, or other factors.

**Mitigation Measures:** There are no additional feasible mitigation measures available to reduce this cumulative impact to a less-than-significant level.

**Significance without Mitigation:** Significant and unavoidable. Similar to Impact WIL-2, even with implementation of the proposed General Plan Update 2050 goals and policies, the only way to fully avoid the cumulative wildfire impact is to prohibit development in Very High FHSZs and WUI throughout the region. As full prohibition of development in these areas is not feasible in the region, this impact is **significant and unavoidable.**

## 3.20.6 References

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# 4. ALTERNATIVES TO THE PROPOSED PROJECT

## 4.1 INTRODUCTION

This chapter presents the alternatives analysis for the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines sec. 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. When evaluating these alternatives, it is assumed that the mitigation strategy contained in this EIR would be applied. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, "Consideration and Discussion of Alternatives to the Proposed Project," of the CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required

> to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (sec. 15126.6[a])

# 4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

## 4.2.1 Project Objectives

Chapter 2, Section 2.5, *Statement of Project Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

## 4.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts.

### LESS-THAN-SIGNIFICANT IMPACTS WITH MITIGATION

The following impacts were found to be less than significant with implementation of mitigation measures.

### General Plan Update/Development Code Update

- **Impact BIO-2a:** Implementation of the General Plan Update could impact wildlife movement.
- **Impact GEO-1a:** Implementation of the General Plan Update could impact paleontological resources.
- **Impact NOI-3a:** Construction activities associated with buildout of the General Plan Update may expose sensitive uses to excessive levels of groundborne vibration.

### Downtown Specific Plan

- **Impact BIO-2b:** Implementation of the Downtown Specific Plan could impact wildlife movement.
- **Impact GEO-1b:** Implementation of the Downtown Specific Plan could impact paleontological resources.
- **Impact NOI-3b:** Construction activities associated with buildout of the Downtown Specific Plan may expose sensitive uses to excessive levels of groundborne vibration.

## SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts were found to be significant and unavoidable even with implementation of mitigation measures.

### General Plan Update/Development Code Update

- **Impact AES-1a:** Implementation of the General Plan Update would have significant and avoidable impacts on scenic vistas.
- **Impact AIR-1a:** Buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.
- **Impact AIR-2a:** Short-term emissions from buildout of the General Plan Update could exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-3a:** Long-term emissions from buildout of the General Plan Update would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-4a:** Construction activities associated with buildout of the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations.
- **Impact AIR-5a:** Operational activities associated with the General Plan Update could expose sensitive receptors to substantial criteria air pollutant and/or toxic air contaminant concentrations.
- **Impact BIO-1a:** Implementation of the General Plan Update could impact aquatic resources, including water of the U.S. and State.
- **Impact CUL-1a:** Implementation of the General Plan Update would impact historical resources.
- **Impact CUL-2a:** Implementation of the General Plan Update would impact archeological resources.
- **Impact GHG-1a:** Implementation of the General Plan Update would result in an increase in GHG emissions and would not achieve the GHG reduction goals established under AB 1279.

- **Impact GHG-2a:** Implementation of the General Plan Update would result in a substantial increase in VMT per service population and would not be consistent with SCAG's Connect SoCal.
- **Impact LU-1a:** Implementation of the General Plan and Development Code Update would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect.
- **Impact NOI-1a:** Buildout of the General Plan Update would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.
- **Impact NOI-2a:** Buildout of the General Plan Update would expose sensitive receptors to substantial permanent traffic noise increases within the project area.
- **Impact POP-1a:** Buildout of the General Plan Update would result in substantial growth that exceeds regional projections for growth in the City.
- **Impact T-1a:** The General Plan Update would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.
- **Impact T-2a:** The General Plan Update would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).
- **Impact TCR-1a:** Tribal cultural resources could be adversely impacted by grading activities associated with the General Plan Update.
- **Impact WIL-1a:** Development under the General Plan Update would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

## Downtown Specific Plan

- **Impact AES-1b:** Implementation of the Downtown Specific Plan would have significant and avoidable impacts on scenic vistas.
- **Impact AIR-1b:** Buildout of the Downtown Specific Plan would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.
- **Impact AIR-2b:** Short-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-3b:** Long-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-4b:** Construction activities associated with buildout of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations.
- **Impact AIR-5b:** Operation of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations.

- **Impact CUL-1b:** Implementation of the Downtown Specific Plan would impact historical resources.
- **Impact CUL-2b:** Implementation of the Downtown Specific Plan would impact archeological resources.
- **Impact GHG-1b:** Implementation of the Downtown Specific Plan would result in an increase in GHG emissions and would not achieve the goals established under AB 1279.
- **Impact GHG-2b:** Implementation of the Downtown Specific Plan would result in a substantial increase in VMT per service population and would not be consistent with several goals of SCAG's Connect SoCal.
- **Impact LU-1b:** Implementation of the DTSP would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect.
- **Impact NOI-1b:** Buildout of the Downtown Specific Plan would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.
- **Impact POP-1b:** Buildout under the Downtown Specific Plan would result in substantial growth that exceeds regional projections for growth in the City.
- **Impact REC-1b:** Buildout of the Downtown Specific Plan would exceed the demand for existing recreational facilities in the Downtown Specific Plan area, potentially resulting in deterioration of existing facilities**.**
- **Impact T-1b:** The Downtown Specific Plan would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.
- **Impact T-2b:** The Downtown Specific Plan would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).
- **Impact TCR-1b:** Tribal cultural resources could be adversely impacted by grading activities associated with implementation of the Downtown Specific Plan.

# 4.3 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

### 4.3.1 Alternative Location Alternative

An "Alternative Location" Alternative would involve selecting an alternative location to that of the General Plan Update Area and DTSP Area. The proposed General Plan Update covers the entirety of the City of San Bernardino, and the sphere of influence, while the DTSP covers a portion of the City's downtown area. Alternative locations are typically included in an environmental document to avoid, lessen, or eliminate the significant impacts of a project by considering the proposed development in an entirely different location. To be feasible, development of off-site locations must be able to fulfill the project purpose and meet most of the project's objectives. Given the nature of the proposed General Plan Update and Development Code Update portion of the proposed project, it is not possible to consider an off-site alternative, as these planning efforts apply to the entirety of the City.

The purpose of the DTSP is to adopt a specific plan to guide development in the City's downtown. Therefore, any alternative location considered outside of the downtown area would not align with the DTSP's purpose and objectives. However, other alignments of this project's boundaries were considered previously within the visioning and planning process. The proposed boundary of the DTSP includes several key areas of the downtown with the potential for redevelopment. In general, any development of the size and type of the DTSP would have substantially the same impacts on air quality, land use/planning, noise, population/ housing, public services, recreation, transportation/traffic and utilities/service systems. Without a site-specific analysis, impacts on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality and mineral resources cannot be evaluated.

For these reasons, an offsite alternative was considered infeasible pursuant to State CEQA Guidelines Section 15126.6(c) and rejected as a feasible project alternative.

### 4.3.2 Restrictions on Adaptive Reuse Alternative

A "Restrictions on Adaptive Reuse" alternative would involve amendments to the City's standards to prohibit adaptive reuse of potentially historic buildings. Adaptive reuse is a development strategy that involves renovating an existing building for a different use than it was originally intended. It typically includes upgrading the interior and its systems to ensure compliance with the latest building codes while preserving the outside façade to maintain its original character. The proposed Dev Code Update includes an Adaptive Reuse Overlay that allows for adaptive reuse of properties in this overlay and provides standards for adaptive reuse projects. Chapter 7, Section 7.7.4 of the DTSP, outlines standards for adaptive reuse within the DTSP Area. Both sets of development standards allow for modernization of buildings in adaptive reuse projects but reuse of state and nationally designated historic buildings must adhere to the Secretary of the Interior's Standards for Rehabilitation.

Nonetheless, significant and adverse changes to the historic quality of a designated historic resource or potentially historic resources could occur under adaptive reuse projects. This alternative would lessen significant impacts to historic resources by prohibiting their redesign and reuse under an adaptive reuse project, thereby allowing these resources to remain in their original form and context. This alternative would not, however, prevent all potential impacts since a historic resource's surroundings related to its significance could still be changed through other nearby development and demolition of historic resources could occur under subsequent environmental review. Further, it is possible that preventing adaptive reuse of an older building could diminish its commercial viability and result in loss of a historic resource by neglect. This alternative would also conflict with the General Plan Update/Development Code Update and DTSP objectives to foster the local economy and support a thriving downtown. Adaptive reuse is a strategy that would help to preserve existing buildings while providing space for new housing and businesses in support of the proposed project's economic objectives. Additionally, state laws allowing for adaptive reuse could not be superseded by the proposed project. Therefore, this alternative is not considered feasible pursuant to State CEQA Guidelines Section 15126.6(c) and rejected as a feasible project alternative.

### 4.3.3 Reduced Density and Intensity Alternative

A "Reduced Residential Density and Intensity" alternative would result in fewer residences and nonresidential uses, which would theoretically reduce traffic and thereby reduce community impacts such as air quality, greenhouse gas (GHG) emissions, noise, and demand for utilities and public services. However, such an alternative would not achieve, or would only partially achieve, the proposed project objectives of providing for growth and job creation within the City. This alternative would not be consistent with regional planning strategies that require accommodation of regional housing needs as established by the State of California and would be inconsistent with the existing certified Housing Element. Finally, by restricting residential and nonresidential growth, the environmental impact of the projected growth would increase development pressure elsewhere in the region, which could increase vehicle miles travelled (VMT) and thereby further degrade air quality and increases in GHG emissions. If regional growth estimates remain constant, it is reasonable to assume that a Reduced Residential Density and Intensity Alternative would relocate impacts from development to other agencies outside of the City and would not meet the project objectives locally or regionally, therefore this option was not evaluated in the EIR.

### 4.3.4 Increased Density and Intensity Alternative

An "Increased Residential Density and Intensity" alternative would result in a proposed Land Use Plan that allows for more residential and nonresidential than currently planned, which while potentially increasing impacts associated with increased development (e.g., air quality, GHG emissions, noise, and demand for utilities and public services), could better meet the

project objectives related to growth, employment, economy, and sustainable transportation options. Increasing the allowable density or intensity of individual parcels could lead to increased development within the City, potentially leading to denser communities and a reduction in environmental impacts correlated to increased density (e.g., less vehicle travel associated with greater accessibility to amenities and jobs within walking or biking distance, increased transit service to meet greater demand). However, such benefits are only likely to materialize if demand exists for this level of development within the City. Between 2001 and 2024, 3,512 housing permits were issued in the City which represents approximately 10 percent of growth in housing units under the horizon General Plan Update analyzed in this Draft EIR (35,940 housing units) (HUD 2025). While several objectives of the proposed project are related to encouraging increased growth within the City, the proposed Land Use Plan already allows a level of development that is expected to meet the demand for development in the City. Therefore, implementation of this alternative is not likely to result in a meaningful reduction in environmental impacts. As such, this alternative was not selected for further analysis due to an inability to reduce environmental impacts.

## 4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project.

- **Alternative 1:** No Project Alternative
- **Alternative 2:** Reduced Warehousing Alternative

## 4.5 ALTERNATIVE 1: NO PROJECT ALTERNATIVE/EXISTING PLANS

Under the “No Project/Existing Plans” alternative, the proposed General Plan Update, Development Code Update, and DTSP would not be implemented by the City. The current 2005 General Plan and existing Development Code would remain in place and no specific plan for the downtown area would be adopted. It is assumed that growth would continue to occur under this alternative pursuant to the existing Land Use Plan. Buildout under the existing Land Use Plan was calculated using assumptions for growth consistent with the proposed project for the purposes of analyzing air quality and VMT impacts. Air quality emissions associated with buildout under this alternative are shown in Table 3.3-12, *City of San Bernardino Regional Criteria Air Pollutant Emissions Forecast,* of Section 3.3, *Air Quality,* and projected VMT for buildout under this alternative is provided in several tables within Impact b) of Section 3.17, *Transportation*.

Buildout under the existing General Plan compared to the proposed General Plan Update is shown in Table 4-1, *No Project/Existing General Plan Buildout Comparison*. These calculations express the total amount of development in the City by 2050 under these scenarios.

**Table 4-1 No Project/Existing General Plan Buildout Comparison**

| Scenario | Occupied Housing Units[1] | Population | Nonresidential Square Feet | Employment |
|---|---|---|---|---|
| No Project Alternative | 95,126 | 298,300 | 102,886,094 | 144,913 |
| Proposed Project | 108,112 | 330,982 | 142,744,306 | 172,190 |
| **Difference** | **12,986** | **32,592** | **39,858,212** | **27,277** |

Note:

1. Reflects occupied housing units instead of total housing units. Buildout in Table 2-4 of Chapter 2 includes vacant units.

As shown in Table 4-1, buildout under the existing General Plan would be less than that of the General Plan Update/proposed project. Development under this alternative would be required to adhere to the existing regulatory standards while development under the proposed project would comply with policies and standards in the proposed General Plan Update, Development Code Update, and DTSP.

## 4.5.1 Aesthetics

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

In this alternative, the City would be developed under the existing land use plan and would involve new development and redevelopment in some of the same areas as the proposed project. Similar to the proposed project, development under the existing General Plan would generally occur where development currently exists and primarily focuses on the reuse or repurpose of sites. However, the proposed General Plan Update would allow denser development in several areas throughout the City potentially resulting in substantial adverse changes to scenic vistas, including obstruction of views, alteration of the visual character of hillsides or ridgelines, and diminished aesthetic quality along major roads and vantage points. Under this alternative, impacts with respect to scenic vistas would be less significant, therefore reducing this aesthetic impact when compared to the proposed project.

Without the proposed General Plan Update, several new policies of the proposed General Plan Update would not be implemented. For example, the proposed Land Use and Urban Form Element includes various new urban design-related policies to guide and enhance development in distinct areas of the City including existing neighborhoods, new districts and places, community edges, major corridors, and key nodes and activity centers. New policies would also

apply to new strategic areas of the City. The proposed Conservation and Open Space Element also identifies new policies that would help to protect scenic resources and scenic vistas in the City. These policies would help to protect aesthetic resources in the City.

However, because the scale of development and potential impacts to scenic vistas would be reduced under this alternative, impacts to aesthetics would be **decreased** under this alternative when compared to the proposed General Plan Update.

### DOWNTOWN SPECIFIC PLAN

Future development in the DTSP area under this alternative would be guided by the existing General Plan land use plan and zoning designations, where any future development would be consistent with current City plans, policies, and regulations regarding aesthetics. If future development under this alternative proposes increased building heights or a variance in building form or visual character, the City would require such projects to demonstrate their consistency with existing plans, policies, and regulations related to aesthetics on a project-by-project basis and would require each project to obtain all applicable permits to ensure visual and aesthetic impacts are reduced to a less than significant level during the project entitlement process. Under the DTSP, this process would be streamlined due to the DTSP's form-based code which allows ministerial review of development consistent with the standards in the DTSP. The DTSP would also provide enhanced design and development standards for the DTSP Area beyond what is currently implemented under the existing Development Code.

However, this alternative would reduce impacts associated with scenic vistas due to the reduced scale of development currently allowed in the Area under the existing General Plan and Development Code. While the DTSP's standards enhancing visual quality would not be implemented under this alternative and therefore potentially increase impacts with respect to this topic, it would potentially reduce impacts to scenic vistas to less than significant. Therefore, overall aesthetic impacts under this alternative would be **decreased** when compared to the DTSP.

## 4.5.2 Agriculture and Forestry Resources

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

In this alternative, the City would be developed under the existing land use plan and would involve new development and redevelopment in similar areas as the proposed General Plan Update. The proposed General Plan Update does not remove any existing protections for agricultural and forestry resources, nor would the areas with these resources in the City be redesignated to a substantially different use under the proposed General Plan Update. Development under proposed General Plan Update or this alternative would result in less than significant or no impacts to agricultural and forestry resources. Therefore, impacts on

agricultural and forestry resources under this alternative would remain **similar** to those under the proposed General Plan Update.

### DOWNTOWN SPECIFIC PLAN

There are no agricultural and forestry resources in the DTSP Area, therefore this alternative would result in no changes to the significance of these impacts when compared to those under the DTSP. This alternative would have no impacts on agricultural and forestry resources and **similar** impacts to the DTSP.

## 4.5.3 Air Quality

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Similar to the buildout of the General Plan Update, this alternative would result in an increase in emissions in the City that have the potential to exceed the South Coast AQMD's significance thresholds. Therefore, like the General Plan Update, implementation of this alternative would result in significant impacts regarding consistency with the AQMD, cumulatively considerable net increase of pollutants for which the project region is in nonattainment and exposing sensitive receptors to substantial pollutant concentrations.

Buildout under this alternative would result in a smaller scale of development compared to the General Plan Update and therefore would generate less emissions associated with construction and operational activities. However, unlike the proposed General Plan Update, this alternative would not implement the updated policies under the General Plan Update which have the potential to reduce air quality emissions. This alternative would also result in greater VMT per capita due to reduced residential density and nonresidential land use intensity. Nonetheless, due to the overall reduction in total development potential, this alternative would have **decreased** air quality impacts when compared to the General Plan Update. However, impacts would remain significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

Under this alternative, less development is assumed to occur within the DTSP Area since the mechanisms that would help to encourage development under the DTSP would not be implemented. Therefore, this alternative would result in lesser impacts with respect to construction and operational emissions since less development would occur. It would continue to result in significant and unavoidable air quality impacts, similar to those under the DTSP, due to the unknown scope of development that could occur. Future development would be subject to any applicable discretionary permits made on a case-by-case basis, and all would be required to comply with all applicable federal, State, and local requirements relevant to air quality.

Even with incorporation of all applicable mitigation measures, obtaining all discretionary permits, and compliance with federal, State, and local requirements, it is speculative at this time to assume that all future projects would be able to reduce their impacts to air quality to a less than significant level under this alternative. It can be assumed that development under this alternative would also be subject to the air quality mitigation measures to reduce impacts from development to the extent possible. Therefore, impacts to air quality under this alternative would remain significant and unavoidable, but **decreased** when compared to the impacts of the DTSP.

## 4.5.4 Biological Resources

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would be within the same footprint as the proposed project; therefore, under this alternative, biological resource impacts would be similar to those under the General Plan Update. A number of special status plant species and special status wildlife species are known to occur in or adjacent to the City, or are known to occur in the region based on historical data. Federal and state regulations require development projects to assess and mitigate potential biological resources within a project site. Similar to the proposed General Plan Update, development under this alternative would result in development where biological resources exist and could result in loss of habitat. However, unlike the proposed General Plan Update, this alternative would not implement new policies with the potential to protect, conserve, and restore habitats and species. However, like development under the proposed General Plan Update, development pursuant to the existing General Plan would be required to incorporate mitigation measures to reduce impacts to less than significant. Therefore, impacts on biological resources would be **similar** when compared to the General Plan Update and impacts would remain less than significant with mitigation incorporated.

### DOWNTOWN SPECIFIC PLAN

The DTSP Area is primarily urbanized and contains minimal biological resources. Nonetheless, development in this area could result in significant impacts to sensitive biological resources requiring the incorporation of mitigation. Since the DTSP allows urban development in the same areas it is currently allowed under the existing General Plan, this alternative would result in **similar** impacts to biological resources. Therefore, impacts to biological resources would remain less than significant with mitigation incorporated under this alternative.

## 4.5.5 Cultural Resources

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Cultural resource impacts are primarily associated with potential ground disturbance and development of previously undisturbed areas, or impacts to potential historic structures (building additions, demolition, etc.). This alternative would be within the same footprint as the proposed General Plan Update; therefore, impacts to cultural resources would be similar to the General Plan Update. Like the General Plan Update, this alternative would also have the potential to impact historic resources as a result of redevelopment. Therefore, impacts to potential cultural/historic resources would be **similar** to those under the General Plan Update and would remain significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

As noted above, a project's potential to impact cultural resources is site-dependent, therefore future development under this alternative, which can occur on the same sites as the DTSP, would have the same potential to impact cultural resources. Future development under this alternative would also be required to comply with all federal, State, and local requirements for protecting cultural resources. Similar to the DTSP, individual projects under this alternative would also be required to incorporate and implement all feasible mitigation measures to reduce impacts to cultural resources, which could include but would not be limited to the same mitigation measures identified for the DTSP. However, like DTSP, less than significant impacts to historic resources cannot be completely mitigated to less than significant as analyses for individual projects would be required to determine and mitigate these impacts. Therefore, impacts under this alternative would be **similar** to those under the DTSP and would remain significant and unavoidable.

## 4.5.6 Energy

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Similar to buildout of the proposed General Plan Update, this alternative would result in an increase in energy use associated with new development. Since buildout under this alternative is less than that allowed under the General Plan Update, less energy would be consumed under buildout of this alternative. However, unlike this alternative, the proposed General Plan Update would include goals and policies that have the potential to reduce energy use in the City, including those that would support the statewide goal of transitioning the electricity grid to renewable sources and promote energy efficient city-owned facilities, including battery storage systems.

Development under both this alternative and the proposed General Plan Update would not result in inefficient, wasteful, or unnecessary energy consumption due to compliance with energy-efficiency regulations. Due to this required compliance, this alternative would also result in the same impacts with respect to the energy plan consistency. While this alternative would potentially consume less energy than the General Plan Update, its consumption would not be less inefficient, wasteful, or unnecessary. Therefore, energy impacts would remain less than significant and **similar** to those of the proposed General Plan Update.

### DOWNTOWN SPECIFIC PLAN

This alternative would comply with the same existing energy laws, regulations, plans, and policies that mandate that future projects in the DTSP Area incorporate energy efficiency and saving designs and strategies for both the construction and operation phases. However, the land use plan under the DTSP would result in significantly denser development in the DTSP Area when compared to development under the existing General Plan. Denser development is often associated with more energy-efficient housing (i.e., housing that uses less energy and water per unit) and allows for increased access to amenities, services, and jobs without use of a vehicle. While per unit energy consumption under the DTSP may be reduced when compared to buildout of the DTSP Area under this alternative, overall energy consumption would likely decrease under this alternative since the DTSP would result in more development. Nonetheless, energy consumption under this alternative would not be less inefficient, wasteful, or unnecessary than the DTSP. Therefore, energy impacts under this alternative would be **similar** to those identified for the DTSP and impacts would remain less than significant.

## 4.5.7 Geology and Soils

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

As with the proposed General Plan Update, individual development projects under this alternative would be required to prepare site-specific geotechnical investigations to evaluate seismic, liquefaction, ground settlement, paleontological resources, and/or soil expansion hazards. All development projects would be required to comply with existing federal, state, and local regulations, such as the California Building Code. Development pursuant to both this alternative and the General Plan Update would be required to comply with the mitigation measures relevant to reducing impacts to paleontological resources. New policies in the proposed Safety Element that target the reduction of geologic and soil hazards risk in the General Plan Update Area would not be implemented under this alternative, but existing 2005 General Plan policies related to geologic hazards would remain in place. Therefore, impacts under this alternative would be **similar** when compared to the proposed General Plan Update. Impacts would remain less than significant with mitigation incorporated.

### DOWNTOWN SPECIFIC PLAN

Development under this alternative would occur in the same locations as development under the General Plan Update and would be subject to the same regulations that reduce geologic and soil hazards impacts to less than significant. There are no actions proposed under the DTSP that would affect severity of hazards or impacts related to geology, soils, or paleontological resources. Therefore, impacts under this alternative would be **similar** when compared to the DTSP. Impacts would remain less than significant with mitigation incorporated.

## 4.5.8 Greenhouse Gas Emissions

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Similar to the buildout of the proposed General Plan Update, this alternative would result in an increase in GHG emissions that would exceed applicable GHG thresholds and be potentially inconsistent with plans and policies adopted to reduce GHG emissions. However, the reduced buildout under this alternative would generate less GHG emissions than buildout of the General Plan Update. This alternative would not, however, include the new policies in the proposed General Plan that would reduce GHG emissions through promotion of mixed use and denser development, incorporation of renewable energy features in new development, pedestrian access and public transportation, and various transportation demand measures. As discussed in Section 3.8, *Greenhouse Gas Emissions*, Mitigation Measure GHG-1a would require the City to prepare and adopt a Climate Action Plan which provide further measures for reducing GHG emissions within the horizon of the General Plan Update. Therefore, impacts with respect to GHG plan consistency may be greater under this alternative since it would not implement these policies and measures that align with the goals of relevant GHG reduction plans. Overall, because this alternative would result in less total GHG emissions when compared to the General Plan Update, impacts of this alternative would be slightly **decreased**. However, impacts would remain significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

Buildout of the DTSP Area under this alternative would result in less development within the DTSP and therefore less emissions associated with construction and operational activities. However, because the DTSP prioritizes denser development within the DTSP Area, per capita GHG emissions would likely be reduced when compared to this alternative. This alternative may also result in greater impacts with respect to consistency with GHG plans when compared to the DTSP since the new policies and mitigation measures discussed with respect to the General Plan Update above, would not be implemented. Nonetheless, because less total emissions would be generated under this alternative, impacts would be slightly **decreased** under this alternative when compared to the DTSP. Impacts would remain significant and unavoidable.

## 4.5.9 Hazards and Hazardous Materials

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Under both this alternative and the proposed General Plan Update, development throughout the City would be required to comply with existing federal, state, and local regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. Under this alternative, the new General Plan Update policies that would reduce potential hazards would not be implemented, but existing 2005 General Plan policies related to hazards and hazardous materials would remain in place to reduce impacts. Therefore, this alternative would result in **similar** impacts compared to the proposed General Plan Update, and impacts would remain less than significant.

### DOWNTOWN SPECIFIC PLAN

Development in the DTSP Area under this alternative would be similar to that under the DTSP with respect to hazards and hazardous materials impacts. Existing regulations would remain in place and the DTSP does not propose any actions or standards that would affect the susceptibility of development to hazards or change how hazardous materials are handled. Therefore, this alternative would result in **similar** impacts compared to the DTSP, and impacts would remain less than significant.

## 4.5.10 Hydrology and Water Quality

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Under both this alternative and the proposed General Plan Update, future project-specific water quality management plans, preliminary and/or final, must be prepared consistent with the prevailing terms and conditions of the SBMC at the time of project application. Moreover, Low Impact Development and water quality treatment solutions must be designed to support or enhance the regional best management practices (BMP) and efforts implemented by the City as part of its efforts to improve water quality. During construction, project-specific Stormwater Pollution Prevention Plans (SWPPP) are required to be prepared in accordance with the site-specific sediment risk analyses based on the grading plans. The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls necessary to mitigate potential pollutant sources. As these actions are required by state regulation, under this alternative, impacts would be **similar** to the proposed project and would be less than significant.

### DOWNTOWN SPECIFIC PLAN

Development under this alternative would continue to comply with the same regulations applicable under the DTSP, thereby reducing all impacts related to water quality and hydrology to less than significant. The DTSP Area is largely built-out and as new uses are developed in this area, whether under this alternative or the DTSP, updates to the stormwater infrastructure in this area may be required. Project-specific studies, implementation of site-specific measures, and payment of development impact fees would largely reduce these impacts. Development of stormwater infrastructure under the DTSP would be guided by the DTSP's Infrastructure chapter as well. Overall, under this alternative, impacts would be **similar** to the DTSP and would be less than significant.

## 4.5.11 Land Use and Planning

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would leave the existing General Plan and development code in place rather than providing the necessary updates as included in the General Plan Update for consistency with new and updated state and local planning laws, such as the California Complete Streets Act of 2008 and the Southern California Association of Governments' 2024–2050 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS) (Connect SoCal). The Complete Streets Act of 2008 requires that cities plan for a multimodal transportation network that serves motorized and nonmotorized modes of transportation, and Connect SoCal encourages three principles that collectively work as the key to the region's future—mobility, economy, and sustainability. Goals and policies in the proposed General Plan Update address the need to establish an interconnected network of bicycle and pedestrian infrastructure that is safe, efficient, and accessible. Comprehensive transit services related to mobility, connectivity, and safety are also addressed in the proposed General Plan Update and not in the existing General Plan.

As the development code update is partially to implement the proposed General Plan, leaving the existing code intact would not affect development. The development code could be amended to include changes mandated by the certified Housing Element, and other changes to state law, but would not result in the streamlined and simplified development code that is part of the proposed project.

While growth would still occur under this alternative, updates to the proposed Land Use Plan and associated Development Code would not occur and therefore, this alternative would not be consistent with regional planning strategies and state housing laws that require accommodation of regional housing needs. As such, this alternative would be inconsistent with the City's adopted Housing Element which requires land use changes to ensure development of the City's regional housing needs allocation. Additionally, it is reasonable to assume that like the proposed

General Plan Update, this alternative would also conflict with SCAG's Connect SoCal goals aimed at improving air quality and reducing GHG emissions and impacts would be considered significant. Therefore, the land use impacts would **increase** under this alternative in comparison to the General Plan Update, and would remain significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

Under this alternative, development in the DTSP Area would be in accordance with existing land use designations and zoning. Since development would occur in accordance to the current land use and zoning designation, future development projects under this alternative would not conflict with the existing General Plan or other regional land use plans adopted to avoid or mitigate impacts on the natural or built environment. However, development under this alternative would likely result in greater VMT per capita within the DTSP Area since it would not allow the same level of density and intensity. As such, this alternative would not provide the same level of consistency with Connect SoCal's VMT reduction goals as the DTSP. Therefore, impacts under this alternative would be **increased** when compared to the DTSP and remain significant and unavoidable.

## 4.5.12 Mineral Resources

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Development under this alternative would occur in the same areas allowed under the proposed General Plan Update. The proposed Land Use Plan designates mineral resources extraction uses in the largely the same areas as the existing General Plan but with minor modifications to ensure consistency with the latest available information from the California Department of Conservation. The proposed Conservation and Open Space Element also includes policies that specifically protect the regionally important mineral resources identified by the state, including Policy OSC-6.1 which directs the City to protect these resources by prohibiting incompatible land uses. Policy 12.4.7 in the existing General Plan directs the City to restrict incompatible land uses within existing or potential surface mining areas. Since the proposed General Plan's policy delineates the exact areas where incompatible development would be prohibited, this policy increases the protections for regionally important mineral resource areas when compared to the existing General Plan's mineral resource-related policy. Nonetheless, impacts would remain less than significant since development under this alternative since it would largely restrict development of incompatible uses on land with regionally important mineral resources, like the proposed General Plan Update. Impacts would be slightly **increased** under this alternative.

### DOWNTOWN SPECIFIC PLAN

The DTSP Area contains land designated as MRZ-2 (see Section 3.12, *Mineral Resources*), which indicates potential for valuable mineral resources. However, under existing conditions, the DTSP

Area is largely urbanized and contains no land available for operating mineral extraction uses due to incompatibility with proximate existing development. As such, development under this alternative would not differ from the DTSP with respect to mineral resource impacts. Impacts would be **similar** under this alternative and remain less than significant.

## 4.5.13 Noise

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Construction and operational noise impacts would be similar to the proposed General Plan Update under this alternative. Like the proposed General Plan Update, construction activities under this alternative could occur close to sensitive receptors, resulting in potentially significant impacts. As development occurs pursuant to the existing General Plan, the number of traffic trips would increase, similar to development under the proposed General Plan. This would result in similar noise increases in traffic noise near sensitive uses, resulting in significant and unavoidable traffic noise impacts. Other types of noise and vibration impacts would remain less than significant with adherence to the City's Noise Ordinance in the SBMC and Development Code. Under the proposed update to the Development Code, the noise standards would remain the same. While the proposed General Plan Update also involves an update to the Noise Element's policy guidance, policies reducing noise impacts would remain similar to those in the 2005 Existing General Plan. However, due to the overall reduced scale of buildout under this alternative, noise and vibration would also be reduced reciprocally with this reduction in buildout. Therefore, noise and vibration impacts under this alternative would remain significant and unavoidable but would be **decreased** to the proposed General Plan.

### DOWNTOWN SPECIFIC PLAN

This alternative would result in less overall development in the DTSP Area when compared to implementation of the DTSP. Therefore, less overall construction may occur, resulting in lesser construction noise and vibration impacts. Noise and vibration impacts under this alternative would slightly **decrease** when compared to DTSP but would remain significant and unavoidable.

## 4.5.14 Population and Housing

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would result less growth in the City when compared to the General Plan Update. This decreased level of growth would be closer to the level of growth projected under SCAG's regional growth projections for the City but would still exceed the projections, which are shown in Table 3.14-9, *Buildout Comparison of the General Plan Update to SCAG Projections*, of Section 3.14, *Population and Housing*. Nonetheless, neither the proposed General Plan Update

or this alternative would result in substantial unplanned growth or substantial displacement. Population and housing impacts would be slightly **decreased** under this alternative in comparison to the proposed General Plan Update, due to the decrease in growth, however like the General Plan Update, impacts would be significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

This alternative would result in less development within the DTSP Area, resulting in less population growth than compared to buildout of the DTSP. However, both this alternative, through the existing General Plan, and the DTSP, provide a planning framework for managing growth within the DTSP Area. Since development would continue in the DTSP Area pursuant to the existing General Plan, the jobs-housing balance under this alternative would likely remain similar to the existing jobs-housing balance in the DTSP Area. The DTSP would significantly improve this balance, which is often used as a metric for determining whether growth in an area is placing jobs in proximity to housing. By allowing for more housing to be placed in proximity to jobs, the growth anticipated under the DTSP is also more likely to reduce VMT when compared to this alternative.

Regardless of the type of growth projected under this alternative when compared to the DTSP, population growth would be decreased under this alternative, resulting in **decreased** impacts. Population and housing impacts would remain significant and unavoidable.

## 4.5.15 Public Services

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would result in less population and employment than the proposed General Plan Update. The potential demand for public services, including fire, police, school, and library services, would therefore be reduced under this alternative. However, population growth would still occur under this alternative, potentially requiring the construction of new facilities. Like with the proposed General Plan Update, the details of any new or expanded public service facilities is unknown and cannot be assessed at this level. Because this alternative would reduce the potential for new or expanded public service facilities to be needed, due its reduced buildout, impacts under this alternative would be **decreased** when compared to the General Plan Update and remain less than significant.

### DOWNTOWN SPECIFIC PLAN

Development in the DTSP would be decreased under this alternative, also reducing demand for public services. Under both the DTSP and this alternative, redevelopment would occur replacing older buildings with newer ones that adhere to the latest fire safety codes and security measures required by the San Bernardino Fire and Police Departments. Since the DTSP would

result in a larger increase of housing in the DTSP Area, school serving the DTSP Area would likely see greater demand for school facilities than under this alternative. Nonetheless, the environmental impacts of any new or expanded public facilities required under either scenario cannot be assessed and would require project details that are currently unknown. However, because this alternative would reduce the potential for new or expanded public service facilities to be needed, impacts with respect to public services would be **decreased** and remain less than significant.

## 4.5.16 Recreation

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would result in a reduced population compared to the General Plan, which would result in a corresponding reduction in demand for recreation and recreational services in the City. Under this alternative, policies in the General Plan Update pertaining to trails, parks, and open space would not be implemented, but existing policies related to these facilities would remain. Therefore, impacts under this alternative would be **decreased** when compared to the proposed General Plan Update and impacts would be less than significant.

### DOWNTOWN SPECIFIC PLAN

Under existing conditions, the DTSP Area contains three parks and is largely built out with non-residential uses. Development under this alternative would maintain the largely nonresidential land use pattern of the DTSP Area, resulting in fewer residential uses and therefore less open space required by new development. While development under the existing General Plan would result in fewer residents and therefore require the less parks and recreation facilities to serve demand, development standards in the DTSP require the provision of recreational/open space by new development to meet its increased demand. The DTSP requires both residential and nonresidential uses to provide publicly accessible open space (in the form of improved spaces like paseos and plazas) if the development is over 50 units and/or 80,000 square feet. Nonetheless, buildout of the DTSP is anticipated to outpace the provision of parkland available within the DTSP area resulting in significant and unavoidable impacts. Since the existing and proposed recreational space in the DTSP area do not meet demand under both the DTSP and this alternative, impacts would be **similar** and remain significant and unavoidable.

## 4.5.17 Transportation

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

This alternative would result in a reduction in overall growth in the City compared to the General Plan Update, reducing total VMT when compared to the proposed project. However,

VMT per service population under buildout of the existing General Plan would be slightly increased when compared to the proposed General Plan Update. The City's thresholds for VMT, based on its Traffic Impact Analysis Guidelines, use VMT per service population for assessing VMT impacts.

The General Plan Update would include policies that address new topics like Complete Streets infrastructure and further expand on existing policies that target providing more active transportation facilities in the City, thereby providing greater consistency with transportation plans that have been adopted since the existing General Plan was updated. Impacts related to other transportation topics would remain the same under this alternative. For example, development under this alternative would continue to adhere to the City's policies and plans for reducing roadway hazards and providing emergency vehicle access, like under the proposed General Plan Update. Overall, impacts to transportation would be slightly **increased** than those under the proposed General Plan and would remain significant and unavoidable.

### DOWNTOWN SPECIFIC PLAN

The land uses allowed under the DTSP would allow significantly more housing in the DTSP Area than under this alternative, thereby improving the area's existing jobs housing balance and improving its VMT per service population. As shown in Table 3.17-5, development under the DTSP would result in 45 percent less VMT per service population when compared to buildout under the existing General Plan in the DTSP Area.

DTSP would also provide enhanced standards for roadway design within its mobility chapter, while this alternative would continue to implement existing City standards for new roadway design and access. Impacts regarding roadway hazards and emergency access would largely be similar under both scenarios. Overall, impacts would be **increased** under this alternative due to the higher VMT per service population under this alternative. Therefore, impacts in the DTSP Area under this alternative would remain significant and unavoidable.

## 4.5.18 Tribal Cultural Resources

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Impacts to tribal cultural resources would primarily be associated with potential ground disturbance and development of previously undisturbed areas. Since this alternative would allow development in the same areas as the General Plan Update, impacts to potential tribal cultural resources would be similar to the proposed General Plan Update. Mitigation measures, like those in Section 3.5, *Cultural Resources,* and 3.18, *Tribal Cultural Resources*, of this DEIR, would be required to reduce impacts to less than significant under both scenarios. Additionally, both the proposed General Plan Update and this alternative would comply with federal and state regulations pertaining to the protection and preservation of tribal cultural resources.

Therefore, impacts to potential tribal cultural resources would be **similar** to the proposed General Plan Update and remain less than significant with mitigation incorporated.

### DOWNTOWN SPECIFIC PLAN

Ground-disturbing activities requiring excavations could result in impacts to tribal cultural resources in the DTSP Area. Compliance with federal and state regulations pertaining to the protection and preservation of tribal cultural resources would apply to development under both this alternative and the DTSP in the DTSP Area. Applicable mitigation measures would also reduce impacts to less than significant under both scenarios. Therefore, impacts to potential tribal cultural resources would be **similar** to the DTSP and remain less than significant with mitigation incorporated.

## 4.5.19 Utilities and Service Systems

### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Due to the smaller scale of buildout under this alternative, demand for utilities would be reduced when compared to the General Plan Update. Therefore, while new or expanded utility infrastructure would likely still be required under this alternative, the amount of improvements needed would likely be less than the General Plan Update. Nonetheless, the details of any new or expanded utility infrastructure is unknown and cannot be assessed at this level. Additionally, since less development would occur under this alternative, it would also have less than significant impacts with respect to water supply availability, wastewater treatment capacity, and solid waste generation. Therefore, impacts would remain less than significant and be slightly **decreased** under this alternative and remain less than significant.

### DOWNTOWN SPECIFIC PLAN

The increase in development potential under the DTSP would result in a proportionate demand for utilities. Since less development would occur under this alternative, it would result in less demand for utility services and subsequently less construction and operation of utility improvements. However, the environmental impacts of these utility improvements would be analyzed on a project-level since the details of such improvements are unknown at this time. All other impacts related to utilities and service systems, including the availability of sufficient water supplies at the project-level, the adequate capacity of wastewater treatment services, the generation of solid waste, and the compliance with management and reduction regulations of solid waste would remain less than significant. Overall impacts would be **decreased** when compared to the DTSP and would remain less than significant.

### 4.5.20 Wildfire

#### GENERAL PLAN/DEVELOPMENT CODE UPDATE

Like under the General Plan Update, this alternative would allow urban development in wildfire-prone areas, resulting in significant and unavoidable impacts with respect to exacerbating wildfire risks. However, because overall buildout under this alternative would be reduced, less development may occur in wildfire-prone areas. The proposed General Plan Update includes new policies that would help to reduce impacts related to wildfire but development under this alternative would be subject to existing wildfire policies in the 2005 General Plan and mandatory State wildfire hazard reduction measures. Impacts under this alternative would be **decreased** when to the proposed General Plan Update and would continue to be significant and unavoidable.

#### DOWNTOWN SPECIFIC PLAN

There are no wildfire-prone areas within the DTSP Area. It is primarily built-out with minimal open space and within the center of the urbanized City. Therefore, neither development under the proposed DTSP nor this alternative would expose people to wildfire risks. Impacts would be **similar** to those under DTSP and continue to be less than significant.

## 4.6 ALTERNATIVE 2: REDUCED WAREHOUSING ALTERNATIVE

Under the “Reduced Warehousing” alternative, the Industrial (I) designation under the proposed Land Use Plan would only allow development of up to 100,000 square feet of warehousing uses on properties with this designation. The Industrial designation is the proposed Land Use Plan’s primary industrial designation that is intended to allow for development of large-scale manufacturing and processing of goods and materials, warehousing, distribution centers, and similar truck- or logistics-focused land uses, along with limited supporting commercial and professional office uses. For purposes of this alternative, the restriction of warehouse size is anticipated to result in fewer warehouse or truck-focused industrial development. While other types of industrial uses can be developed in the industrial designation, (e.g. research and development centers, office blocks) this alternative assumes less overall industrial development because of competition for similar land uses in the region. The US Census Bureau estimates that 22 percent of the jobs in the City are related to warehousing and logistics. It is reasonable to assume that either this percentage will decline, or that workers will seek similar employment outside the City.

Under the proposed Land Use Plan, 3,355 acres of land in the General Plan Update Area would be designated under the Industrial designation to support these uses. Over the last two

decades, the Inland Empire, including the City of San Bernardino, has seen a growing demand for larger "Big Box" distribution and logistics centers, which typically require over 100,000 square feet of space. Between 2015 and 2021, 27 warehouse project applications have been processed and approved by the City of San Bernardino, equating to approximately 9,600,000 square feet of space, or approximately 355,000 square feet per new project (Whitehead 2021). In 2024, the average size of existing industrial buildings in the City was 68,365 square feet while the average size of industrial buildings under construction in the City in 2024 was 319,600 square feet (RivCoEd 2024).

The proposed Land Use Plan's Industrial designation is intended to support growth of this industry in the City. However, the City recognizes the environmental impacts of this type of development and has included new policies in the proposed General Plan Update to protect sensitive communities in the City. The proposed Health and Environmental Justice Element is a new element part of this General Plan Update and includes various policies aimed at protecting these communities from the harmful impacts of large industrial development. These are shown in Table 4-2, *General Plan Update Policies that Reduce Impacts from Industrial Development*. Relevant industrial land use policies from the Land Use and Urban Form Element are also included.

### Table 4-2 General Plan Update Policies that Reduce Impacts from Industrial Development

| | |
|---|---|
| **Land Use and Urban Form Element** | |
| LUD-11.4 | **Manage industrial use impacts.** Monitor and ensure that industrial land uses operate in a safe and healthful manner through full compliance with permits for the use, storage, production, or transporting of toxic or hazardous materials, waste byproducts, or emissions. |
| LUD-11.5 | **Compatibility with adjoining uses.** Ensure that all industrial facilities near sensitive receptors incorporate screening, landscaping, and enclosure provisions necessary to prevent exposure to odor, noise, dust, smoke, gas, fumes, cinders, or refuse matter. |
| **Health and Environmental Justice Element** | |
| HEJ-5.1 | **Sensitive Land Use Adjacent to Sources of Pollution**. Discourage the development of sensitive land uses (e.g., schools, playgrounds, housing, health-care facilities, and elder and childcare centers) within 500 feet of sources of air pollution. Sources of air pollution include but are not limited to freeways, railyards, mining, and industrial uses with manufacturing, dust emissions, or high truck traffic. |
| HEJ-5.2 | **Railyard Air Pollution**. Support the reduction of pollution exposure and adverse health impacts from the railyards. Work with BNSF to reduce the level of on-site pollution generated from mechanical equipment and switcher locomotives; monitor air pollution emanating from the yard as a result of expanded rail volume. |
| HEJ-5.3 | **Trucking Routes**. Develop, maintain, and amend as needed a comprehensive system of local truck routes that meets the needs of the City's logistics economy while |

**Table 4-2 General Plan Update Policies that Reduce Impacts from Industrial Development**

| | |
|---|---|
| | protecting residential and sensitive land uses from the air pollution emissions from trucks. Require logistics uses to mitigate impacts to the extent feasible. |
| HEJ-5.5 | **Pollution Impacts**. Require new or substantially expanded industrial and manufacturing uses to conduct an analysis of impacts from pollution emissions. Require implementation of pollutant mitigation measures determined to be feasible at the time of project approval. |
| HEJ-5.9 | **Health Risk Assessments**. As allowed by CEQA and state law, require that new qualifying projects prepare a cumulative health risk assessment to determine whether construction or operational impacts exceed established risk thresholds; require that developers demonstrate mitigation of impacts prior to the approval of the project. |

The aim of this alternative is to further the goals of the Health and Environmental Justice Element by limiting the development of large-scale facilities. This alternative would effectively restrict the development of larger logistics centers in the City which may reduce health risk impacts on sensitive communities in addition to reducing other environmental impacts associated with these facilities, as discussed below. This alternative would maintain all other aspects of the General Plan and Development Code Update and DTSP but would place a cap on the size of logistic center development.

Because no new large-scale industrial uses are envisioned or permitted under the DTSP, this alternative would have no impact on implementation of the DTSP. Therefore, the following analysis analyzes impacts at the citywide scale only, which includes the DTSP Area.

## 4.6.1 Aesthetics

Under this alternative, no new large-scale logistics centers would be permitted. Under the proposed Land Use Plan, such facilities would primarily be developed in existing industrial areas of the City or in outlying areas along major transportation corridors. Development of any building size in these areas is therefore unlikely to affect scenic vistas and scenic resources. Since all development under the General Plan Update would be subject to the standards in the proposed Development Code Update or applicable Specific Plan, this alternative would have similar impacts to visual quality as the proposed project. However, large-scale logistics/warehousing developments typically require high-intensity night lighting and expansive security illumination, in addition to operating for 24 hours day. This alternative would result in less operations requiring this scale of lighting, therefore reducing lighting impacts.

Therefore, aesthetic impacts would be **decreased** under this alternative but would remain significant and unavoidable.

## 4.6.2 Agriculture and Forestry Resources

Since no land under the proposed Industrial designation contains agricultural or forestry resources, this alternative would result in the same impacts as the proposed project with respect to this resource topic. Impacts would remain less than significant and be **similar** to the proposed project.

## 4.6.3 Air Quality

The trucks associated with large-scale warehouse uses are well-documented as having intensive air quality health risk impacts (Attorney General's Office 2022). These uses typically serve as regional hubs and operate with long-haul heavy-duty trucks (Class 8) which generate high amounts of Toxic Air Contaminants relative to other vehicle types. Smaller-scale industrial development is typically more local-serving, requiring less heavy-duty vehicles. Additionally, development under this alternative would use less off-road equipment pieces for daily business operations (e.g., forklifts) and transport refrigeration units (TRUs). Therefore, this alternative would reduce regional and localized air quality impacts from operational activities. Overall, this alternative would result in **decreased** construction and operation regional and localized air quality impacts than the proposed project. However, it would still result in significant and unavoidable impacts.

## 4.6.4 Biological Resources

Under this alternative, less large-scale warehousing uses would be developed but other uses allowed under the Industrial designation are assumed to be developed in place of the warehousing. As such, this alternative would not impact the footprint of development in the City; the same amount of land would be developed and the same potential impacts to biological resources would occur. Biological resource impacts under this alternative would be **similar** when compared to the proposed project and remain less than significant with mitigation incorporated.

## 4.6.5 Cultural Resources

As with biological resources, impacts to cultural resources would be similar under this alternative since the same amount of land would be developed under this alternative when compared to the proposed project and would therefore result in the same potential to encounter and adversely affect sub-surface resources. Impacts to historic resources would also remain significant and unavoidable since this alternative would allow development in the same areas as the proposed project. Impacts under this alternative would be **similar** to the proposed project but remain significant and unavoidable.

### 4.6.6 Energy

While large-scale warehousing development would be reduced under this alternative, it would not reduce the overall amount of developable space under the proposed project, resulting in a similar construction intensity and construction-related energy demand when compared to the proposed project. The reduction in allowed warehousing square footage would result in fewer truck, off-road equipment, and TRUs associated with the larger-scale warehouses, which would reduce operational transportation fuel use. However, transportation fuel use associated with light-duty vehicle trips may increase since other land uses developed in place of the large-scale warehousing would likely generate more of these vehicle trips when compared to the warehousing uses. Building energy demand may also decrease since the development replacing the large warehousing uses would be less likely to operate 24 hours a day. Therefore, this alternative would also result in less than significant impacts and **decreased** energy impacts compared to the proposed project.

### 4.6.7 Geology and Soils

As noted for biological and cultural resources, this alternative would result in the same amount of developable land in the City, which would also result in similar impacts to paleontological resources. It would also have largely similar impacts with respect to geologic and soil hazards since all development would be required to comply with applicable codes and regulations to ensure that reduces risks associated with these hazards. Therefore, this alternative would result in **similar** impacts compared to the proposed project and impacts would be less than significant with mitigation incorporated.

### 4.6.8 Greenhouse Gas Emissions

This alternative would result in similar building potential when compared to the proposed project and therefore result in similar construction-related GHG emissions. Operational emissions associated with building operations would also remain similar. However, there would be a reduction in truck trips off-road equipment use, and TRUs use, which are typically correlated with the size of warehousing facilities. Light-duty vehicle VMT may increase due to the higher VMT associated with other industrial/commercial land uses when compared to larger warehousing uses. Additionally, new logistics centers could be developed elsewhere in the region to meet demand not met within the City and residents of the City employed by this industry may seek these jobs outside of the City, therefore increasing citywide VMT associated with this commuting. Nonetheless, the decreased fuel efficiency of trucks when compared to passenger vehicles would result in trucks generating greater GHG emissions per vehicle-mile, thereby resulting in more total emissions under the proposed project when compared to this alternative. While total GHG emissions under this alternative may be reduced, impacts related to GHG plan consistency, including consistency with Connect SoCal would remain significant and

unavoidable. Overall, while this alternative would **decrease** impacts compared to the proposed project, it would still also result in significant and unavoidable GHG emissions impacts.

## 4.6.9 Hazards and Hazardous Materials

Under this alternative, less warehousing would reduce the use, transportation, and storage of hazardous materials from the proposed project. However, other uses developed in place of large-scale warehousing could still result in the handling of hazardous materials. As with all development, compliance with local, State, and federal regulations pertaining to hazardous materials would be required. Impacts would be less than significant and **similar** when compared to the proposed project.

## 4.6.10 Hydrology and Water Quality

Under this alternative and the proposed project, future development would be required to prepare and implement project-specific water quality management plans and SWPPPs to reduce stormwater pollutants during operation and construction activities. While less intensive warehousing would be developed under this alternative, site-specific impacts for hydrology and water quality would remain **similar** since the same amount of land would remain developable. Impacts would continue to be less than significant.

## 4.6.11 Land Use and Planning

Development under this alternative or the proposed project would not divide an established community. However, this alternative could result in fewer jobs compared to the proposed project and potentially conflict policies and goals in the Economic Development Element of the proposed General Plan Update which prioritize regional economic competitiveness and job creation in the logistics sector. Therefore, land use consistency impacts would be **increased** under this alternative. Impacts would remain less than significant.

## 4.6.12 Mineral Resources

The proposed General Plan Update's Industrial-Extraction (IE) land use is intended to protect areas with regionally important mineral resources to ensure that this land is compatible with extraction uses. Land designated as Industrial would be in proximity to IE-designated land. The development allowed under this alternative near IE-designated areas would continue to be industrial in nature and prohibit development types that would typically result in impacts with respect to land use compatibility with extractive uses (e.g., residential uses). This alternative would result in **similar** impacts to mineral resources when compared to the proposed project and impacts would remain less than significant.

### 4.6.13 Noise

The less intensive warehousing uses that would be allowed under this alternative would reduce all types of noise and vibration impacts when compared to the larger-scale warehousing allowed under the proposed project. While passenger vehicle trips would increase, truck trips, which are louder than passenger vehicles, would be reduced resulting in traffic noise. Other sources of operational noise associated with warehousing uses, including truck idling, backup alarms, and roof-mounted mechanical equipment, would also be reduced. Overall, this alternative would **decrease** impacts compared to the proposed project, but it would still also result in significant and unavoidable impacts.

### 4.6.14 Population and Housing

This alternative would significantly limit the amount of warehousing space allowed in the City. While other uses would be developed in place of large-scale warehousing, this alternative is assumed to result in fewer jobs compared to the proposed project due to existing presence of this industry as a source of jobs in the City. This could in turn decrease demand for housing and result in prospective residents seeking housing elsewhere in the region to remain closer to warehousing jobs. As such, this alternative would result in less population growth in the City, which would result in population growth closer to the regional projections under SCAG. However, neither this alternative nor the proposed project would result in substantial unplanned growth or displacement. Impacts under this alternative would remain significant and unavoidable but would be **decreased** when compared to the proposed project.

### 4.6.15 Public Services

Impacts on public services, including fire, police, school, and library services, would be reduced under this alternative given the reduction in jobs and overall population growth. However, the environmental impacts associated with the potential expansion of public facilities cannot be addressed at this time, similar to the proposed project. Due to the reduction in demand, impacts would be **decreased** under this alternative and remain less than significant.

### 4.6.16 Recreation

Residential uses typically result in a higher demand for recreational facilities than nonresidential uses. The residential designations of the proposed General Plan Update would remain unchanged under this alternative but the reduction in warehousing space would result in fewer jobs which could lead to less demand for new housing in the City to accommodate workers. As such, demand for recreational facilities would also be reduced. Impacts under this alternative

would remain less than significant and would be **decreased** when compared to the proposed project.

## 4.6.17 Transportation

This alternative would result in a reduction of warehousing square footage and jobs in the City, but would still allow other uses to develop. While this alternative would reduce truck trips, it would likely higher passenger vehicle trips compared to the proposed project since other industrial/commercial uses typically generate more passenger vehicle trips when compared to large-scale warehousing uses. Residents seeking warehousing jobs may need to commute outside the City to access these jobs resulting in higher VMT. As with the proposed project, this alternative would not conflict with plans or policies related to alternative transportation or result in inadequate emergency access. Given the increase in passenger vehicle trips and associated VMT, impacts would remain significant and unavoidable and would be **increased** when compared to the proposed project.

## 4.6.18 Tribal Cultural Resources

Under this alternative, footprint-related impacts would remain similar. This would result in similar potential to discover and adversely impacts tribal cultural resources in the General Plan Update Area. Therefore, impacts would be **similar** when compared to the proposed project and impacts would continue to be less than significant with mitigation incorporated.

## 4.6.19 Utilities and Service Systems

Future connections would be designed and constructed to meet service provider standards. Sewer, water, stormwater, and solid waste would be treated pursuant to regional and state laws. As this alternative would result in potentially less employees, the demand for water and generation of solid waste, wastewater, and stormwater would be **decreased** compared to the proposed project. Impacts would remain less than significant.

## 4.6.20 Wildfire

Land in the Industrial designation is within fire-prone areas. Therefore, because this alternative would result in development that places fewer structures and people in these areas, wildfire risk impacts would be reduced. All development under the General Plan Update would be required to comply with regulations of the Office of State Fire Marshal as contained in the California Building Code, California Fire Code, and California Referenced Standards Code. This alternative would not exacerbate the uncontrolled spread of wildfire or pollutant concentrations due to slope, prevailing winds, or fuels, compared to the proposed project.

Under both this alternative and the proposed project, the installation of roadways, power lines, and other utilities could increase the risk of wildfires; however, power lines and other utilities would be installed underground, which would minimize risks. Overall, because this alternative would result in similar development than the proposed project, wildfire impacts would be **similar** but remain significant and unavoidable.

# 4.7 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-3, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

**Table 4-3 Comparison of Project Alternative Impacts**

| Environmental Topic | Proposed Project[1] | Alternative 1: No Project Alternative | Alternative 2: Reduced Warehousing |
|---|---|---|---|
| **3.1 Aesthetics** | | | |
| General Plan Update | SU | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.2 Agriculture and Forestry Resources** | | | |
| General Plan Update | LTS | = | = |
| Downtown Specific Plan | LTS | = | = |
| **3.3 Air Quality** | | | |
| General Plan Update | SU | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.4 Biological Resources** | | | |
| General Plan Update | LTS/M | = | = |
| Downtown Specific Plan | LTS/M | = | = |
| **3.5 Cultural Resources** | | | |
| General Plan Update | SU | = | = |
| Downtown Specific Plan | SU | = | = |
| **3.6 Energy** | | | |
| General Plan Update | LTS | = | ↓ |

## Table 4-3 Comparison of Project Alternative Impacts

| Environmental Topic | Proposed Project[1] | Alternative 1: No Project Alternative | Alternative 2: Reduced Warehousing |
|---|---|---|---|
| Downtown Specific Plan | LTS | = | = |
| **3.7 Geology and Soils** | | | |
| General Plan Update | LTS/M | = | = |
| Downtown Specific Plan | LTS/M | = | = |
| **3.8 Greenhouse Gas Emissions** | | | |
| General Plan Update | SU | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.9 Hazards and Hazardous Materials** | | | |
| General Plan Update | LTS | = | = |
| Downtown Specific Plan | LTS | = | = |
| **3.10 Hydrology and Water Quality** | | | |
| General Plan Update | LTS | = | = |
| Downtown Specific Plan | LTS | = | = |
| **3.11 Land Use and Planning** | | | |
| General Plan Update | SU | ↑ | ↑ |
| Downtown Specific Plan | SU | ↑ | = |
| **3.12 Mineral Resources** | | | |
| General Plan Update | LTS | ↑ | = |
| Downtown Specific Plan | LTS | = | = |
| **3.13 Noise** | | | |
| General Plan Update | SU | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.14 Population and Housing** | | | |
| General Plan Update | SU | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.15 Public Services** | | | |
| General Plan Update | LTS | ↓ | ↓ |

## Table 4-3 Comparison of Project Alternative Impacts

| Environmental Topic | Proposed Project[1] | Alternative 1: No Project Alternative | Alternative 2: Reduced Warehousing |
|---|---|---|---|
| Downtown Specific Plan | LTS | ↓ | = |
| **3.16 Recreation** | | | |
| General Plan Update | LTS | ↓ | ↓ |
| Downtown Specific Plan | SU | ↓ | = |
| **3.17 Transportation** | | | |
| General Plan Update | SU | ↑ | ↑ |
| Downtown Specific Plan | LTS | ↑ | = |
| **3.18 Tribal Cultural Resources** | | | |
| General Plan Update | SU | = | = |
| Downtown Specific Plan | SU | = | = |
| **3.19 Utilities and Service Systems** | | | |
| General Plan Update | LTS | ↓ | ↓ |
| Downtown Specific Plan | LTS | ↓ | = |
| **3.20 Wildfire** | | | |
| General Plan Update | SU | ↓ | = |
| Downtown Specific Plan | LTS | = | = |

Notes:

1. The impacts listed in this column represent the highest significance determination for each respective topic.

NI No Impact
LTS Less than Significant
LTS/M Less than Significant with Mitigation
SU Significant and Unavoidable

↓ Reduced impact in comparison to the proposed project
= Similar impact in comparison to the proposed project
↑ Greater impact in comparison to the proposed project

Table 4-4a, *Ability to Meet General Plan Update Objectives*, identifies the ability of each of the project alternatives to meet the General Plan Update's objectives. Table 4-4b, *Ability to Meet Downtown Specific Plan Objectives*, identifies the ability of each of the project alternatives to meet the DTSP's objectives.

## Table 4-4a Ability to Meet General Plan Update Objectives

| Objective | General Plan Update | Alternative 1: No Project Alternative | Alternative 2: Reduced Warehousing |
|---|---|---|---|
| 1. Provide well-designed and accessible residential neighborhoods and commercial and industrial districts to provide opportunities for people to live, work, and play. | Yes | Partial | Yes |
| 2. Ensure equitable treatment of all residents, businesses, and community groups, while ensuring broad community participation and ownership of the public process. | Yes | Partial | Yes |
| 3. Ensure residents' access to diverse employment opportunities, quality education, safe neighborhoods, reliable public services and infrastructure systems, and a healthy physical environment. | Yes | Partial | Partial |
| 4. Ensure access to dependable, accessible, affordable, and environmentally responsible transportation options. | Yes | Partial | Yes |
| 5. Maintain a robust and resilient economy that nurtures the growth of local businesses, a thriving downtown, emergent and innovative industries, and ensures household prosperity. | Yes | Partial | No |
| 6. Foster a vibrant community that supports healthy lifestyles, historical resources, arts, education, and culture for all residents. | Yes | Partial | Yes |

## Table 4-4b Ability to Meet Downtown Specific Plan Objectives

| Objective | DTSP | Alternative 1: No Project Alternative | Alternative 2: Reduced Warehousing |
|---|---|---|---|
| 1. Induce private sector investment in Downtown San Bernardino. | Yes | No | Yes |
| 2. Transform underutilized and underperforming properties and parking lots in the Downtown into vibrant spaces. | Yes | No | Yes |
| 3. Provide for a diverse mix of residential living choices. | Yes | No | Yes |
| 4. Expand employment opportunities throughout the Downtown and surrounding area. | Yes | No | Yes |
| 5. Ensure a range of quality green and open spaces. | Yes | No | Yes |
| 6. Promote sustainable and mixed-use development that creates a network of connected streets, parks, walkways, and vibrant street-level storefront commerce that will create an activated environment and a sense of security and safety. | Yes | No | Yes |
| 7. Reduce automobile dependency by creating a compact, pedestrian-oriented, mixed-use environment within walking distance of transit. | Yes | No | Yes |
| 8. Leverage the extraordinary access to existing rail and bus transit by linking land use with transportation. | Yes | No | Yes |
| 9. Encourage green building design, including sustainable technologies such as rooftop gardens and agriculture, stormwater management, photovoltaic energy sources, and other renewable and conservation technologies. | Yes | No | Yes |

### 4.7.1 Summary of Alternative 1: No Project Alternative

The "No Project/Existing Plans" alternative would reduce impacts with respect to aesthetics, air quality, greenhouse gas emissions, noise, population and housing, public services, recreation, and utilities and service systems, for both the General Plan/Development Code Update and DTSP. This alternative would increase impacts with respect to land use and planning and transportation for both the General Plan/Development Code Update and DTSP. Impacts would remain similar for agricultural and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, and tribal cultural resources for both the General Plan/Development Code Update and DTSP. This alternative would increase mineral resource impacts in the General Plan Update Area but would have no change to impacts in the DTSP Area. Additionally, wildfire impacts would decrease under this alternative in the General Plan Update Area but remain the same in the DTSP Area.

This alternative would partially meet the General Plan Update's objectives since it would maintain the existing General Plan and Development Code which address most of the same topics as the proposed General Plan Update. However, it would not meet any DTSP objectives since it would not implement a specific plan for the downtown area.

### 4.7.2 Summary of Alternative 2: Reduced Warehousing

The "Reduced Warehousing" alternative would decrease impacts to aesthetics, air quality, energy, greenhouse gas emissions, noise, population and housing, public services, recreation, and utilities and service systems under the General Plan Update and result in similar impacts for agricultural and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, and wildfire. Impacts related to land use and planning and transportation would increase under this alternative. All impacts under the DTSP would remain the same because this alternative would have no impact on the implementation of the DTSP.

This alternative would meet all objectives of the DTSP since the DTSP's land use plan does not include large-scale industrial development. This alternative would largely meet the objectives of the General Plan Update, but would not provide as diverse of employment opportunities as the proposed Land Use Plan, thereby only partially meeting Objective 3 under the General Plan Update. Additionally, this alternative would not support Objective 5 under the General Plan Update because it would result in less jobs in the city, eliminating the potential for an industry of significant importance to the city and region to grow. The loss of these jobs and revenue for the City could also affect its economy.

# 4.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of the City of San Bernardino. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

The environmentally superior alternative is the "Reduced Warehousing" alternative. This alternative reduced the most impacts relative to the proposed project and would meet most of the General Plan Update's objectives and all of the DTSP's objectives.

# 4.9 REFERENCES

California Department of Justice, Attorney General's Office. 2022, September. *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*. https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

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# 5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the proposed project based on the analyses presented in Sections 3.1 through 3.20 of this Draft Environmental Impact Report (DEIR). The topics covered in this chapter include effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects. A more detailed analysis of the effects that the proposed project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapter 3, *Environmental Analysis*, of this Draft EIR.

## 5.1 EFFECTS NOT FOUND TO BE SIGNIFICANT

Based on the comprehensive nature, scope, and scale of the proposed General Plan Update, Development Code Update, and Downtown Specific Plan, which will guide all future development and land use decisions citywide, an Initial Study was not prepared because the City determined that the project has the potential to cause several significant and unavoidable environmental impacts. The project's growth-inducing effects and its contribution to regional cumulative impacts on areas such as transportation, air quality, utilities, as well as other topics necessitate a full EIR to provide adequate public disclosure and analysis of these substantial physical changes to the environment.

## 5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects." CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-3, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this Draft EIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

Though mitigation measures, where feasible, would reduce the level of impact of the proposed project, the following impacts would remain significant and unavoidable:

## General Plan Update/Development Code Update

- **Impact AES-1a:** Implementation of the General Plan Update would have significant and avoidable impacts on scenic vistas.
- **Impact AIR-1a:** Buildout of the General Plan Update would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.
- **Impact AIR-2a:** Short-term emissions from buildout of the General Plan Update could exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-3a:** Long-term emissions from buildout of the General Plan Update would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-4a:** Construction activities associated with buildout of the General Plan Update could expose sensitive receptors to substantial toxic air contaminant concentrations.
- **Impact AIR-5a:** Operational activities associated with the General Plan Update could expose sensitive receptors to substantial criteria air pollutant and/or toxic air contaminant concentrations.
- **Impact BIO-1a:** Implementation of the General Plan Update could impact aquatic resources, including water of the U.S. and State.
- **Impact CUL-1a:** Implementation of the General Plan Update would impact historical resources.
- **Impact CUL-2a:** Implementation of the General Plan Update would impact archeological resources.
- **Impact GHG-1a:** Implementation of the General Plan Update would result in an increase in GHG emissions and would not achieve the GHG reduction goals established under AB 1279.
- **Impact GHG-2a:** Implementation of the General Plan Update would result in a substantial increase in VMT per service population and would not be consistent with SCAG's Connect SoCal.
- **Impact LU-1a:** Implementation of the General Plan and Development Code Update would conflict with appliable plans adopted for the purpose of avoiding or mitigation an environmental effect.
- **Impact NOI-1a:** Buildout of the General Plan Update would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.
- **Impact NOI-2a:** Buildout of the General Plan Update would expose sensitive receptors to substantial permanent traffic noise increases within the project area.
- **Impact POP-1a:** Buildout of the General Plan Update would result in substantial growth that exceeds regional projections for growth in the City.
- **Impact T-1a:** The General Plan Update would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.

- **Impact T-2a:** The General Plan Update would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).
- **Impact TCR-1a:** Tribal cultural resources could be adversely impacted by grading activities associated with the General Plan Update.
- **Impact WIL-1a:** Development under the General Plan Update would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

## Downtown Specific Plan

- **Impact AES-1b:** Implementation of the Downtown Specific Plan would have significant and avoidable impacts on scenic vistas.
- **Impact AIR-1b:** Buildout of the Downtown Specific Plan would cumulatively contribute to the nonattainment designations in the SoCAB and would be inconsistent with the AQMP.
- **Impact AIR-2b:** Short-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-3b:** Long-term emissions from buildout of the Downtown Specific Plan would exceed South Coast AQMD's threshold criteria and cumulatively contribute to the nonattainment designations in the SoCAB.
- **Impact AIR-4b:** Construction activities associated with buildout of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations.
- **Impact AIR-5b:** Operation of the Downtown Specific Plan could expose sensitive receptors to substantial toxic air contaminant concentrations.
- **Impact CUL-1b:** Implementation of the Downtown Specific Plan would impact historical resources.
- **Impact CUL-2b:** Implementation of the Downtown Specific Plan would impact archeological resources.
- **Impact GHG-1b:** Implementation of the Downtown Specific Plan would result in an increase in GHG emissions and would not achieve the goals established under AB 1279.
- **Impact GHG-2b:** Implementation of the Downtown Specific Plan would result in a substantial increase in VMT per service population and would not be consistent with several goals of SCAG's Connect SoCal.
- **Impact LU-1b:** Implementation of the DTSP would conflict with appliable plans adopted for the purpose of avoiding or mitigation of an environmental effect.
- **Impact NOI-1b:** Buildout of the Downtown Specific Plan would expose sensitive receptors to substantial temporary construction noise increases in the vicinity of the project.
- **Impact POP-1b:** Buildout under the Downtown Specific Plan would result in substantial growth that exceeds regional projections for growth in the City.

- **Impact REC-1b:** Buildout of the Downtown Specific Plan would exceed the demand for existing recreational facilities in the Downtown Specific Plan area, potentially resulting in deterioration of existing facilities**.**
- **Impact T-1b:** The Downtown Specific Plan would conflict with the SCAG Regional Transportation Plan/Sustainable Communities Strategy.
- **Impact T-2b:** The Downtown Specific Plan would result in a potentially significant transportation impact related to VMT and could conflict with the intent of CEQA Guidelines Section 15064.3(b).
- **Impact TCR-1b:** Tribal cultural resources could be adversely impacted by grading activities associated with implementation of the Downtown Specific Plan.

# 5.3 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

The following are the significant irreversible changes that would be caused by the proposed project if it is implemented:

- The buildout of development envisioned by the proposed General Plan Update, Development Code Update, and Downtown Specific Plan would require a long-term and substantial commitment of nonrenewable and slowly renewable energy resources, including gasoline, diesel fuel, and electricity for construction and operational energy; human resources for construction and ongoing municipal services; and natural resources such as sand, gravel, cement, steel, and other metals for construction materials, as well as water for permanent consumption.
- The operation of new residential, commercial, and industrial development under the proposed plans would require a permanent and increased commitment of electricity, petroleum-based fuels, fossil fuels, and water, significantly exceeding existing citywide consumption levels.

  The operation of the new development would require a long-term and irreversible commitment of expanded public services and maintenance, including police, fire, water, sewer, solid waste, and other municipal services to serve a larger population and employment base.

The commitment of land, energy, water, materials, and public service resources required for the construction and permanent operation of the development enabled by these plans would limit

the availability of these finite resources for future generations or for other uses during the life of the developed uses, which is expected to extend for decades.

# 5.4 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical factors may include the removal of obstacles to population growth, such as through a major expansion of a wastewater plant.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) states, "It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." In other words, negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary, growth-inducing impacts consist of growth-induced in the region by additional demand for housing, goods, and services associated with a population increase caused by or attracted to a new project. This analysis provides an overall discussion of project impacts and considers utility infrastructure and circulation to determine whether the project would result in direct or indirect growth inducement.

The proposed General Plan Update, Development Code Update, and Downtown Specific Plan would establish new long-range policy and regulatory frameworks to guide future growth and development within the City of San Bernardino. The proposed project would not directly construct new buildings or infrastructure itself but would allow for potential future development consistent with the new plans.

The proposed project would facilitate future residential, commercial, and mixed-use development, which could increase the City's population and employment capacity over the 25-year planning horizon. The project site encompasses the entire City and its sphere of influence, which is an already urbanized area largely served by existing infrastructure, though some capacity improvements may be needed to support full buildout.

The adoption of the plans is a legislative action that would set a policy precedent for the City's future growth. The planning activities to update general plans, zoning codes, and specific plans are common practices for local governments statewide to manage development and comply with state laws.

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This Draft Environmental Impact Report (EIR) was prepared by the City of San Bernardino in consultation with the following organizations, consultants, and individuals.

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