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SAN BERNARDINO COUNTY

Project & Facilities Management Department
Project Management Division

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DATE: September 24, 2026

TO: California State Clearinghouse

FROM: San Bernardino County

SUBJECT: SCH 2026010330: ARMC Parking Structure Memorandum

Attached to this memo is a Mitigation and Monitoring Program Plan to correct the mitigation/monitoring measures identified in the approved IS/MND for the Arrowhead Regional Medical Center (ARMC) Parking Structure project. The attached document incorporates additional tribal and biological monitoring measures into the CEQA record that were not submitted previously.

Please let me know if you have any questions about this submittal.

Sincerely,

Jon Aldana

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Arrowhead Regional Medical Center Lot 1 Parking Structure

Addendum
Initial Study/Mitigated Negative Declaration

Mitigation Monitoring and Reporting Program

COUNTY OF SAN BERNARDINO
385 N. Arrowhead Avenue
San Bernardino, CA 92415

CEQA Lead Agency

September 2026

DAVID EVANS AND ASSOCIATES INC.

Introduction

Under California Public Resources Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097, lead public agencies must adopt a Mitigation Monitoring and Reporting Program (MMRP) whenever they approve a project with an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND). In 2025, David Evans and Associates, Inc. (DEA) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) on behalf of San Bernardino County, as the lead agency, in compliance with California Environmental Quality Act (CEQA) Statute Section 21064.5 and Section 15063. The following MMRP has been prepared as an addendum to the IS/MND and complies with the above citations for adoption by San Bernardino County.

Project Description

San Bernardino County (County) is replacing an existing surface parking lot with a new multi-story parking structure to provide additional employee parking on the Arrowhead Regional Medical Center (ARMC) campus (project) at 400 North Pepper Avenue in the City of Colton. The new parking structure will be constructed entirely within the footprint of the existing paved surface lot. A temporary parking lot and construction staging area will be located along Meridian Street on an undeveloped lot owned by California State University (see attached figures).

Mitigation Plan

Through the IS/MND, mitigation measures were identified to limit project impacts to less than significant on 17 major categories of environmental factors. The project's contractor must comply with all of the mitigation measures identified in the IS/MND to remain in compliance with the project's CEQA commitments. Mitigation measures for two of these categories - Biological Resources and Cultural Resources -- are supplemented further in this MMRP to provide specific guidance to the project's contractor in implementing and complying with these mitigation measures during construction. The contractor shall keep a copy of this MMRP and the IS/MND at the construction site to ensure compliance with the project's mitigation measures.

Cultural Resources

The cultural resources mitigation measures discussed herein have been adapted from the IS/MND to incorporate feedback from the Tribes following AB52 consultation. The County received responses from six Tribes, four of whom requested to consult under AB52:

- Gabrieleño Band of Mission Indians – Kizh Nation – Requested consultation
- Yuhaaviatam of San Manuel Nation (YSMN) – Requested consultation
- Morongo Band of Mission Indians (Morongo) – Requested consultation
- Gabrielino Tongva Indians of California – Requested consultation
- Fort Yuma Quechan – Did not request consultation, deferred to local Tribes
- Agua Caliente – Did not request consultation, deferred to local Tribes

Of the four Tribes that requested consultation, the County received requests to adopt additional mitigation measures from the Kizh Nation and the YSMN. The Kizh Nation and the Morongo also requested Tribal monitoring during construction.

The following Tribal Cultural Resources (TCRs) mitigation measures for the project incorporate the mitigation measures identified in the IS/MND and the mitigation measures received from the Kizh Nation and YSMN into one integrated set of measures.

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians - Kizh Nation, Yuhaaviatam of San Manuel Nation, Gabrieleno Tongva Indians of California, or Morongo Band of Mission Indians (consulting Tribes), as requested. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to grading, excavation, trenching, and foundation work.

B. A Monitoring and Treatment Plan will be developed and a copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribes. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, Tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the consulting Tribes.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the consulting Tribes from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the consulting Tribes to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Tribal TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 60 feet) and shall not resume until the discovered TCR has been fully assessed by the tribal monitors and/or on-call archaeologists. The potential tribal cultural resource shall be properly assessed and treated in accordance with Public Resource Code (PRC) Section 21074(a)(2). Appropriate measures, which may include avoidance, preservation in place, or other mutually acceptable treatment, shall be developed in consultation with the affiliated Tribes, if applicable, prior to resumption of ground-disturbing activities.

   Stop Work Procedures for Cultural Resources: Immediately stop work within 60 feet of the site of the discovery and work can proceed following tribal assessment of the resource.

   Notification: Consulting tribes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.98 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

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

Stop Work Procedures for Human Remains: Immediately stop work within 100 feet of the site of the discovery. All assessment work in the area of discovery must be suspended for 30 days.

Notification: Bernardino County Coroner and Consulting Tribes (Coroner notifies California Native American Heritage Commission within 24 hours if human remains are of a Native American)

TCR-4: Creation of Archaeological/Cultural Information

A. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to the consulting Tribes. The Lead Agency and/or applicant shall, in good faith, consult with the applicable Tribes throughout the life of the project.

Biological Resources

Biological resource mitigation measures were identified in the IS/MND to limit impacts to these resources to less than significant. The following mitigation measures shall be implemented and compliance will be documented.

BIO-1: Protection of the Delhi Sands Flower Loving Fly (DSF)

The following measures will be implemented to protect DSF on the adjacent property:

- Project boundaries will be clearly defined during construction using marking and fencing, including designating the ingress and egress routes, to ensure that no impacts will occur to the adjacent DSF conservation area.
- A fence or other appropriate barrier will be installed as part of the project along the eastern and southern edge of the project area to limit access to the DSF conservation area.
- At least one week prior to construction, a qualified biologist will inspect the site and ensure that the limits of construction have been properly defined (e.g., fenced), are readily identifiable, and are not encroaching on the adjacent DSF habitat.

- All contractors and project personnel will receive an environmental training conducted by a qualified biologist familiar with DSF. The environmental training will present information on life history, ecology, legal and conservation status of DSF, avoidance and minimization measures, and potential penalties associated with violating the Endangered Species Act (ESA). Personnel will be required to sign and date a form indicating that they have attended the training and fully understand the avoidance and minimization measures and agree to comply with them.
- Dust will be kept to a minimum during construction (e.g., water exposed areas, covering soil stockpiles).
- The construction site will be kept free of trash, refuse, and other waste.
- Permanent lighting at the project site will be shielded to minimize impacts to DSF and other wildlife.

BIO-2: Protection of Nesting Birds

Tree removal activities should be conducted outside of nesting bird season. However, if project activities are conducted during nesting bird season (generally February 1 through August 31), preconstruction nest surveys shall be conducted in and near the project (within 200 feet for large raptors and 100 feet for all other birds) by a qualified biologist no more than 3 days prior to construction activities. If nesting is identified during the preconstruction survey, then a buffer shall be established of a size determined by the project biologist to be sufficient to avoid impacts to nesting birds and/or the project shall be modified and/or delayed as necessary to avoid direct take of the identified nests, eggs, and/or young.

Monitoring Compliance Record

The following example table will be used to assign responsibility for each monitoring and reporting task and identify who completed the mitigation measure or monitoring compliance and date of completion.

Resource	Mitigation Measure	Monitoring Responsibility	Monitoring Compliance Record (Name/Date)
TCR-4	Any and all archaeological/cultural documents created as a part of the project shall be supplied to the applicant and Lead Agency for dissemination to the consulting Tribes		
BIO-1	Project boundaries will be clearly defined during construction using marking and fencing, including designating the ingress and egress routes		
BIO-1	All contractors and project personnel will receive an environmental training conducted by a qualified biologist familiar with DSF		

Contacts

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Figure 1. Project Vicinity

Figure 2. Parking Garage and Temporary Parking Lot Locations